Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

PSHSB Issues Advisory to EAS Participants To Check Equipment for Possible Queuing of Unauthorized EAS Message for Future Transmission; Requests Comment on Impact of Unauthorized EAS Alerts and Announces Inquiry into Circumstances of Retransmission of Unauthorized EAS Message in Several States	))))))))	PS Docket No. 14-200

COMMENTS OF AT&T[1]

I. Introduction

AT&T fully supports the Commission's goals of ensuring that the Emergency Alert System (EAS) is a secure, reliable, and effective component of a network that provides the public with timely and accurate emergency alerts. AT&T appreciates the opportunity to participate in the Commission's efforts to achieve those goals. These comments regarding issues raised in the *2014 Unauthorized EAS Alert PN* are one aspect of such participation.

II. Discussion

A. Impact to EAS Participants

AT&T's U-verse IPTV video service (U-verse IPTV) has been affected by two unauthorized Emergency Action Notification (EAN) alerts since 2010. The first occurred in the early morning of 12/07/2010 when an engineer at broadcast station WMAV-FM 90.3 used the

[1] AT&T Services, Inc., on behalf of the subsidiaries and affiliates of AT&T Inc. (collectively, "AT&T"), respectfully submits these comments in response to *PSHSB Issues Advisory to EAS Participants To Check Equipment for Possible Queuing of Unauthorized EAS Message for Future Transmission; Requests Comment on Impact of Unauthorized EAS Alerts and Announces Inquiry into Circumstances of Retransmission of Unauthorized EAS Message in Several States*, Public Notice, PS Docket No. 14-200, DA 14-1626 (PSHSB rel. Nov. 7, 2014) (*2014 Unauthorized EAS Alert PN*).

designation code for an EAN to send an alert message to the Memphis viewing area. This local radio station in the Memphis market area used the code for an EAN without including a message or following up the alert with a termination notice called an Emergency Action Termination (EAT). This resulted in the U-verse set-top boxes (STBs) served by the Memphis Video Hub Office (VHO) to force tune to the designated EAN channel. It is AT&T's understanding that, after some additional investigation, it was found that the WMAV radio station had received an EAN from another radio station, WBLE, and relayed the EAN. AT&T further understands that the WBLE radio station needed to issue a Required Monthly Test (RMT) code but instead accidentally used the EAN code incorrectly.

The second instance occurred on the morning of 10/24/2014. On that date, AT&T's records indicate that VHOs in the following locations were affected by a false EAN alert: Augusta, GA; Austin, TX; Charlotte, NC; Fayetteville, AR; Gulfport, MS; Greensboro, NC; Nashville, TN, Lafayette, LA; Shreveport, LA; Jackson, MS, and Atlanta, GA. The false EAN was traced back to a syndicated radio show that was mocking Comcast for displaying an EAS test during Game 2 of the World Series. In the course of the programming, the radio show re-transmitted the EAN alert tone from a 2011 FEMA EAN test. This triggered the U-verse IPTV EAS equipment serving the affected VHOs to process the EAN and immediately force-tune the STBs.

In both instances described above, the U-verse IPTV Emergency Alert System processed the EANs because they were received from an authorized source.

The U-verse IPTV EAS system uses FIPS county code targeting when transmitting EAS/EAN alerts. When processed through the U-verse IPTV EAS system, the alerts are passed on to the subscribers' STBs. Depending on the Service Override Priority (SOP) value assigned

to the channel, the STB will display the alert or force-tune to the appropriate EAS channel if the subscriber is within the FIPS code area embedded in the EAS/EAN alert.

During the false EAN event that occurred on 12/07/2010 in the Memphis market, AT&T was not able to cancel an EAN without an End Of Message (EOM) notification and had to wait until the EOM was received in order to terminate the EAN. The U-verse EAS system was subsequently revised to allow the U-verse Video Operations Center the ability to manually issue a global abort message to terminate any EANs determined to be false. U-verse IPTV utilized this feature during the 10/24/2014 incident, and it performed flawlessly.

B. Message Authentication

AT&T recognizes the extreme importance of providing timely public safety information. Therefore, U-verse IPTV receives, processes and distributes all the required alerts as mandated by the Federal, State, and Local (including local override notifications) Emergency Alert plans so long as these alerts are received from an authorized source by the U-verse IPTV EAS equipment. Further, U-verse IPTV's EAS solution is designed to ensure that U-verse IPTV customers receive all National, State and Local Emergency Alerts as quickly as possible. In the case of an EAN, if the EAN is received from an authorized source and passes the filtering described below, the message is distributed to U-verse IPTV subscribers and their STBs are force-tuned to the appropriate local EAS channel.

Currently, EAN notifications are filtered/validated as follows:

U-verse IPTV's firmware accepts EAN messages based on the following criteria:

- The EAS header must be valid (comply with EAS protocol).
- Any location is accepted, but at least one valid FIPS code (six numeric characters) must be present.

- A valid (3 character) originator code must be included.
- The EAN has not been expired for more than two hours.
- The origination time is in the future.

Going forward, U-verse IPTV plans to replace the current firmware with a new version that incorporates multiple functionalities into one unit. This new platform has stricter filtering included that will allow U-verse IPTV to validate the authenticity of an EAN based on a broader range of parameters, including a strict time/expiration requirement that will filter out any message that has expired.

AT&T notes that, in its view, a major flaw in the EAS/EAN alerts broadcast over-the-air is that the EAS header does not include a year field in the timestamp. Thus, AT&T strongly urges the Commission to revise the EAS header requirements to include a year field in the timestamp. Including a year field in the EAS header would reduce the likelihood of false EAN/EAS alerts being processed by any EAS equipment listening to the LP-1/LP-2 (Local Primary) stations in the various market areas.

C. Public Impact

As described above, if an unauthorized alert passes the filtering/validating processes in place, STBs will be force-tuned to the appropriate local EAS channel. As also described above, U-verse IPTV has employed measures, and will employ additional measures, that reduce the impact of any force-tuning and the likelihood that such situations will occur in the future.

III. Conclusion

AT&T applauds the Commission for exploring ways to maximize the effectiveness of the nation's emergency alert system. The fact-finding initiated by the *2014 Unauthorized EAS Alert PN* will assist the Commission in achieving that important goal.

Respectfully submitted,

/s/ Alex Starr

Alex Starr
Gary L. Phillips
Lori Fink
1120 20th Street, NW
Suite 1000
Washington, D.C. 20036
(202) 457-2044 – phone
(202) 457-3073 – facsimile

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Attorneys for AT&T