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March 13, 2015

Ms. Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Notice of *Ex Parte*: Multilingual Broadcast Emergency Communications
Docket EB 04-296 et al.

Dear Ms. Dortch:

This letter reports on a meeting held on March 12, 2015 with the following representatives from the Commission: Admiral David Simpson, Chief of the Public Safety and Homeland Security Bureau; Lisa Fowlkes, Deputy Chief of the Public Safety and Homeland Security Bureau; Renee Roland, Senior Council of the Public Safety and Homeland Security Bureau (by phone); and, Greg Cook, Associate Chief of Policy and Licensing Division, Public Safety and Homeland Security Bureau. Representatives from the Multicultural Media, Telecom and Internet Council ("MMTC") were: David Honig, President Emeritus and General Counsel; Jacqueline Clary, Senior Council and Deputy Policy Director; Karen Bryson, Law Clerk; and Juanita Love Davis, Research Assistant.

The purpose of the meeting was to discuss the potential implementation of a multilingual broadcast emergency alerts communications plan that serves all communities before, during, and after an emergency. During the meeting, MMTC shared that emergency plans, inclusive of multilingual alerts, are a critical component of any national, state and local emergency response scenario. MMTC reiterated its position on this issue by emphasizing that broadcasters must be required to coordinate and implement plans that serve non-English speakers, especially in more diverse markets.¹

¹ See MMTC Reply comments for the Review of the Emergency Alert System, EB Docket No. 04-296. (filed June 12, 2014), Available at <http://mmtconline.org/wp-content/uploads/2014/06/MMTC-Multilingual-EAS-Reply-Comments-06-12-14.pdf>. Last visited March 13, 2015. Requesting broadcasters and local governments develop a plan to ensure that non-English speaking populations receive timely access to both emergency alert system (EAS) alerts and non-EAS emergency information.

In the meeting, MMTC shared that despite the state obligations imposed on broadcasters to report their emergency response plans, the FCC must do more than simply require reports.² Instead, MMTC urged the Commission to hold broadcasters accountable for serving non-English speaking populations in their communities, and also impose consequences on broadcasters that fail to take part in such plans or (if they opt out of a state plan) fulfill a multilingual emergency service requirement on their own.³ Multilingual populations are at the highest risk of being excluded from emergency communications during emergencies. Thus, MMTC urged the FCC to consider whether, if a station that fails to help disseminate potentially lifesaving multilingual information before, during, and after an emergency has the requisite character to be a broadcast licensee.

For ten years, MMTC and 40 other organizations have been asking the Commission to mandate a nationwide multilingual emergency alerts system that serves the critical information needs of vulnerable populations. With the shifting of U.S. demographics, particularly among those where English will not be their predominant language, MMTC believes that the time is now to improve upon how our public safety systems reach all populations. This is a moral issue of the highest consequence.

Respectfully submitted,

Kim Keenan

President and CEO
MMTC

² See *Comcast Corp. v. FCC*, 600 F.3d 642, 659 (D.C. Cir. 2010) holding that 47 USC §257 directed the Commission to submit a market entry barriers report to Congress but did not require the agency to actually take any steps to reduce market entry barriers).

³ See 47 USC §309(e).