

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Part 11 of the Commission's Rules) PS Docket No. 15-94
Regarding the Emergency Alert System)

TFT, Inc.

Comments

Concerning the
Notice of Proposed Rulemaking
Regarding the
Emergency Alert System

I. INTRODUCTION

1. These comments to the Commission's Notice of Proposed Rulemaking (NPRM) to revise the Federal Communications Commission's Emergency Alert System (EAS) rules, are made by TFT, Inc., a California manufacturer of FCC Certified EAS Encoder/Decoders and Decoders and are based on the company's experience in developing, producing, refining and supporting EAS since its inception.

2. TFT comments on Paragraphs 7, 8, 9, 10, 12, 14, 15, and 16.¹

II. COMMENTS

A. Proposed EAS Event Codes - Proposed addition of both extreme wind warning and storm surge event codes²

3. Part 11 of the Commission's Rules already provides 54 Event Codes³, 30 of which (55%) are weather-related. Included in these authorized Event codes are High Wind

¹ Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System, PS Docket No. 15-94, adopted July 8, 2015, and released July 10, 2015.

² Ibid. at Paragraph 7.

Warning, High Wind Watch, Hurricane Warning, Hurricane Watch, and Hurricane Statement. All of the currently authorized events represent conditions that potentially threaten lives and property.

4. Although broadcasting, cablecasting, programming, and meteorological professionals may discern the difference in granularity among “Watch”, “Warning” and “Statement”, the general public may not necessarily recognize the same level of granularity. Furthermore, the general public may not appreciate the differences between “Extreme” and “High” in the same technical way that professionals do.

5. The Emergency Alert System functions best when it provides the general public with information about threats to life or property to which they can react immediately in a relatively short time. For example, a Tornado Watch or Tornado Warning alerts the general public to seek shelter or protection prior to the occurrence of an actual event that may occur within the next few minutes. On the other hand, earthquake prediction in the United States has not progressed to the level available in other countries to warn the public of an earthquake before the actual event. In a sense, earthquakes in the United States are “self-alerting”. The public do not have sufficient time to react to protect themselves from the effects of an earthquake were they warned by EAS. At the other end of the time spectrum, hurricane prediction has advanced to the point that days, even weeks, of notice of hurricane threats can be provided by many media to the public. The EAS is not as useful in the case of hurricanes for this reason because of the lack of need for immediate action.

³ 46 C.F.R. §§ 11.31(e)

6. Areas prone to hurricanes already have information avenues in place to advise actions that need to be taken in advance of a hurricane threat. This education has developed over many years of experience and warning notice.

7. The general public, upon hearing of a threat to life or property via EAS or some other means, quickly seek confirmation of the information and of the need to take immediate action accordingly. Most people do not assess the fine details of the differences in similar and related types of events. For a flood, most people would instinctively think to seek higher ground and avoid low lying areas. They would try to determine some sort of time frame for the potential event and would not necessarily take different actions for a “Flash Flood” as opposed to a “Flood”. Immediacy is the key determinant. Similarly, the public would attempt to take immediate action in a hurricane prone area for potential flooding whether it is due to a storm surge or not. The public would already be in an alerted state because of the hurricane event. The addition of EWW, SSA, and SSW⁴ will not promote additional safety of life and property. When threatened by these weather-related events, the public will not take time to contemplate the various differences in possible actions but will seek the most immediate action for the general category of the threat.

8. Costs to implement the addition of EWW, SSA, and SSW Event codes will vary with models of TFT equipment. Users of TFT EAS911 and TFT EAS911D will incur a minimal cost of \$215 per unit for exchange of EPROMs necessary to add these Event codes. In addition, users of the TFT EAS911 and TFT EAS911D will have to re-program their devices after EPROMs have been exchanged. The labor involved in replacing the

⁴ *Op. cit.* Paragraph 8, Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket No. 15-94, adopted July 8, 2015, and released July 10, 2015

EPROMs and in re-programming these units may require anywhere from one to two hours of a skilled technician's time. Users of the TFT 3320 CAP-to-EAS Converter will not incur any additional expense. Users of the TFT EAS911+ will have to obtain a new uploadable file from the factory. Although there will be no charge for this file, it will require the services of a competent technical person for approximately one hour.

9. Other changes to Event codes are not warranted at this time. The list of 54 Events covers in adequate detail the occurrences that are likely to affect the public. They are both sufficiently broad and uniquely specific to convey a call to action for the general public.

10. Therefore, TFT, Inc. opposes the addition of EWW, SSA and SSW Event codes.

B. Geographic Location Code Revisions - B. Proposed Geographic Location Code Revisions

11. Although various Offshore (Marine Areas) are defined in the current rules⁵, their use is quite limited. Their effectiveness relates only to those EAS Participants that choose to rebroadcast emergency messages for these offshore areas. There are very few consumer devices that monitor the facilities of EAS Participants that are capable of detecting and decoding codes for these specific areas. EAS Participants tend to cover much wider areas than these specific offshore areas. The boating public are more often aware of broadcasts for wider on-shore areas. Changing the geographic codes will have little or no benefit to a significant population. The inconsistencies in the descriptions of these areas will not be meaningful to the public.

⁵ 47 C.F.R. §§ 11.31

12. Although NWS in its letter and comments to the Commission, with respect to cost considerations, has “checked with several EAS encoder/decoder manufacturers, and was informed that the cost and time to make the requested change would be nominal”⁶, this is not the case with users of TFT legacy equipment such as the TFT EAS911 and TFT EAS911D. Users of the TFT EAS911 and TFT EAS911D will have to re-program their devices after EPROMs have been exchanged. The labor involved in replacing the EPROMs and in re-programming may require anywhere from one to two hours of a skilled technician’s time. Users of the TFT 3320 CAP-to-EAS Converter will not incur any additional expense. Users of the TFT EAS911+ will have to obtain a new uploadable file from the factory. Although there will be no charge for this file, it will require the services of a competent technical person for approximately one hour.

13. Therefore, TFT, Inc. opposes the revision of geographic descriptions for location codes 75 and 77.

III. CONCLUSION

14. For the above-mentioned reasons, TFT congratulates the Commission on this Notice of Proposed Rulemaking to seek input for amendment of Part 11 of the Commission’s Rules regarding the Emergency Alert System.

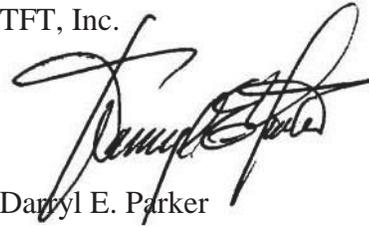
15. Because of the costs involved in these additions and revisions and because of the lack of benefit to the public to alert them to potential threats to life and property, TFT, Inc. opposes all these proposals.

⁶ *Op.cit.* Paragraph 15, Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket No. 15-94, adopted July 8, 2015, and released July 10, 2015

August 7, 2015

Respectfully submitted,

TFT, Inc.

A handwritten signature in black ink, appearing to read "Darryl E. Parker". The signature is stylized with large, sweeping loops and a prominent initial "D".

Darryl E. Parker
Senior Vice President

August 7, 2015