

 **Fletcher, Heald & Hildreth**

1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

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ROBERT J. BUTLER
HARRY F. COLE
ANNE GOODWIN CRUMP
DONALD J. EVANS
PAUL J. FELDMAN
KEVIN M. GOLDBERG
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FRANK R. JAZZO
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HOWARD M. WEISS

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RICHARD HILDRETH
GEORGE PETRUTSAS
JAMES P. RILEY

OF COUNSEL
THOMAS J. DOUGHERTY, JR.
ROBERT M. GURSS*
KATHRYN A. KLEIMAN
MITCHELL LAZARUS
ROBERT J. SCHILL
LAURA A. STEFANI*
ROBERT M. WINTERINGHAM

FRANK R. JAZZO
(703) 812-0470
JAZZO@FHHLAW.COM

* NOT ADMITTED IN VIRGINIA

BY E-MAIL

Tom Beers, Esquire
Chief, Policy Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
Room 7-A846
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Waiver

Dear Mr. Beers:

On behalf of the Alaska Broadcasters Association ("ABA") and its member radio and television broadcast stations, pursuant to Section 1.3 of the FCC's Rules, we hereby request waiver, to the extent necessary, of Sections 11.31, 11.45 and 11.61 of the FCC's Rules, in order to conduct a special test of the Alaska Emergency Alert System ("EAS"), as permitted under Section 11.61 of the FCC's Rules. The ABA, in conjunction with the National Weather Service ("NWS") and the Alaska Division of Homeland Security and Emergency Management ("ADHSEM"), plan to conduct a special test of the EAS using the live Tsunami Warning Code ("TSW") on Wednesday, March 25, 2015, at 10:15 a.m., Alaska Daylight Time, in connection with Tsunami Preparedness Week, as designated by the Governor of Alaska. A copy of a draft of the Governor's Proclamation is attached hereto. The test will be canceled in the event of any significant seismic activity.

Description of the Test. On Wednesday, March 25, 2015, NWS, ADHSEM and ABA have scheduled a special EAS test using the Tsunami Warning Code (“TSW”) to test the effectiveness of and preparedness of local jurisdictions, state and federal agencies, the broadcast and cable communities, and other participants in the Alaska Tsunami Warning System, to warn coastal communities in the event of a distant tsunami. The required monthly test (“RMT”) for the State of Alaska is scheduled for March 4, 2015, and will be run throughout the state, including the coastal areas included in this live code TSW test requested for March 25, 2015. A primary goal of this test is to recreate as many elements of a real activation as possible. NOAA’s West Coast and Alaska Tsunami Warning Center will organize the alert and transmit it via NOAA systems to NWS Forecast and Service Offices in Alaska. NWS will then issue a special tsunami audio test message using the SAME/EAS TSW code for the coastal areas of the State of Alaska from British Columbia to the end of the Aleutian chain, over NOAA Weather Radio. While previous tests have tested the TSW code for the entire State of Alaska, this year’s test is tailored to just those areas likely to have an actual TSW activation along the Alaskan coast. Last year 5 FIPS codes were created in tsunami risk zones. The FIPS codes went into effect in February of 2014. Alaska tsunami activations no longer use the state code and are now warning area specific. Last year’s test was inconclusive on producing tangible results to track whether the new FIPS codes properly activated broadcaster endecs. Part of this test will be to test the outcome of the new FIPS codes in Southeast Alaska. ABA is helping radio and television broadcasters verify in advance that their endecs have been updated. (See attached map with before and after changes).

All audio will clearly communicate that this is a test. Because crawler text on broadcast television and cable systems will indicate that a tsunami warning has been issued for the coastal areas of the State of Alaska, the following steps are being taken to mitigate any viewers who have audio lowered or only comprehend the crawl:

1. The ABA has prepared a special slide to air for over-the-air broadcasters to insert with the words “THIS IS A TEST OF THE TSUNAMI WARNING SYSTEM” in large print on the screen.
2. Cable operators that use force tune channel EAS procedures have been asked to put the words “TEST” on their screens for this special test.
3. Two video public service announcements (PSAs) have been produced that will be aired immediately prior to, and after the transmission of, the EAS message.

Need for Live Code Testing. The Alaska State Emergency Communications Committee, ADHSEM and the National Oceanic and Atmospheric Administration (“NOAA”) Alaska Region have demonstrated through previous live code testing of the TSW event code and real-world

activations of the EAS for tsunami warnings that EAS encoder/decoder equipment in Alaska is not consistently programmed to allow for the automatic relay of TSW messages. Research indicated that EAS encoder/decoder manufacturers configure their equipment "out of the box" with the TSW event code not configured for automatic relay. Transmitting the RMT event code monthly only verifies that participants' equipment can relay that specific event code. In addition, (perhaps) another critical deficiency in the current EAS system, as designed, is the lack of event code acknowledgment or receipt of relay. TSW originators have no real-world way to verify receipt and retransmission of the TSW event by all coastal participants and State Relay Network stations. Verifying the actual retransmission of the code under well-planned and documented testing is crucial.

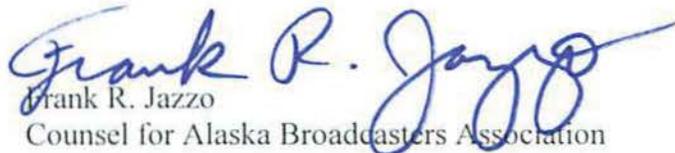
Test Coordination. The primary sponsors of this test are the ABA, ADHSEM, the NOAA Alaska Region, and the Alaska State Emergency Communications Committee. Through the public information campaign described below, and through the ADHSEM training, exercise, outreach, and mitigation offices, the test has been coordinated with local emergency management and public safety agencies. This includes the development and execution of more in-depth table top and functional tsunami warning and evaluation exercises utilizing the Homeland Security Exercise and Evaluation Program format and the coordination by NOAA and ADHSEM with those communities in Alaska that are designated "Tsunami Ready™" and those that have received National Tsunami Hazard Mitigation Program grant funding for the installation of Tsunami sirens.

Public Information Steps. The proposed live code TSW EAS test will be preceded by a comprehensive public information campaign designed to advise the public of the coming test and to minimize the likelihood of confusion and/or panic by the public. PSAs have been recorded and sent to commercial radio and television stations throughout the state, and to GCI, the primary cable operator in Alaska. Copies of the scripts of the PSAs to be run from March 19 through 11:59 p.m. on March 24 and from 12:01 a.m. through 10:15 a.m. on March 25 are attached hereto. The attached "Chill, It's a Drill!" school district flyer will be distributed by the State to all major school districts in the coastal areas of the State. Finally, NWS will also be running PSAs on NOAA weather radio between March 19 and 24. Information regarding the test will also be available on the web pages of ABA, NOAA, NWS, ADHSEM and the Alaska Governor.

This special test will help ensure that the Alaska Tsunami Warning System is functioning properly. Alaska's coastal areas have experienced devastating tsunamis in the past with substantial loss of life and the proper functioning of the warning system is crucial to saving many lives. Accordingly, we respectfully request grant of any waiver that may be necessary to authorize the special test described above.

Very truly yours,

FLETCHER, HEALD & HILDRETH, PLC


Frank R. Jazzo
Counsel for Alaska Broadcasters Association

Enclosures

cc: James Wiley, Esquire (w/enc.) (by e-mail)
Ms. Cathy Hiebert (w/enc.) (by e-mail)
Mr. Dennis Bookey (w/enc.) (by e-mail)
Mr. Bryan Fisher (w/enc.) (by e-mail)

Chill, It's a Drill!

On Wednesday, March 25 between 10:15 AM and 10:45 AM you may hear tsunami sirens and, if you are watching TV or listening to the radio, you may hear or see a message that a tsunami warning has been issued for all of Alaska. However, it's just a test to make sure that the tsunami warning system works from one end to the other. So tell your friends and family:

- It's not a real emergency
- Do not evacuate your home
- Do not call 911

In short, on March 25, Chill, it's a Drill!

Presented by NOAA's National Weather Service, Alaska's Division of Homeland Security and Emergency Management, and the Alaska Broadcasters Association



THIS IS A TEST



Tsunami Preparedness Week

Effective Date: xxxxxx, March xx, 2015

WHEREAS, natural disaster preparedness is our greatest tool for safeguarding our people, property, and livelihoods; and

WHEREAS, Alaska is the most seismically active state in the United States, and has experienced 12 of the 15 largest earthquakes in the United States' history; and

WHEREAS, scientists at the Alaska Earthquake Information Center detected a record number of earthquakes in Alaska and the bordering parts of Canada in 2014 – 40,686; and

WHEREAS, Alaska's Lituya Bay is home to the world's highest tsunami in recorded history, measuring approximately 1720 feet; and

WHEREAS, as many communities are situated along the state's vast coastline, tsunamis pose a serious threat to Alaskans; and

WHEREAS, just last year, a magnitude 7.9 earthquake triggered a tsunami warning for hundreds of miles of the Aleutian Island coastline; and

WHEREAS, because of Alaska's high tsunami threat, the National Oceanic and Atmospheric Administration (NOAA) operates the National Tsunami Warning Center in Palmer to monitor tsunami activity and issue warnings, advisories and watches; and

WHEREAS, through a collaborative partnership between federal, State, and local officials, many coastal communities are currently recognized as "Tsunami Ready." The "Tsunami Ready" program promotes hazard preparedness through community awareness; and

WHEREAS, on March 27, 1964, the Great Alaskan Earthquake and Tsunami damaged or destroyed many communities along the Alaska Coast and killed over 130 people in Alaska, Oregon, and California.

NOW, THEREFORE, I, Bill Walker, Governor of the State of Alaska, do hereby proclaim March 22 - 28, 2015 as:

Tsunami Preparedness Week

in Alaska, and call on all Alaskans, especially coastal inhabitants, to plan for and practice the appropriate response for tsunami warnings.

Dated: March xx, 2015



700 W 41st Avenue, Suite 102, Anchorage, AK 99503
P: 907-258-2424; F: 907-258-2414; Email: akbagold@gci.net

**2015 TSUNAMI LIVE CODE TEST
RUN INSTRUCTIONS-TV & RADIO PUBLIC SERVICE ANNOUNCEMENTS**

Track 1. Run from 12:00 am March 19 to 11:59 pm March 24, 2015.

Alaska Broadcasters, National Weather Service and Alaska Division of Homeland Security and Emergency Management will be conducting a test of the Tsunami Warning System Wednesday March 25th at approximately 10:15 am.

This test will be conducted for portions of coastal communities in Southeast Alaska, the Kenai Peninsula, Kodiak and the Aleutians. You'll hear the test on the radio and see it on local and cable television.

Go to ready dot Alaska dot gov to report your test reception.
This test will be cancelled in the event of any significant seismic activity.

**Track 2. Run from 12:00 am March 25th until
10:15 a.m. March 25th 2015**

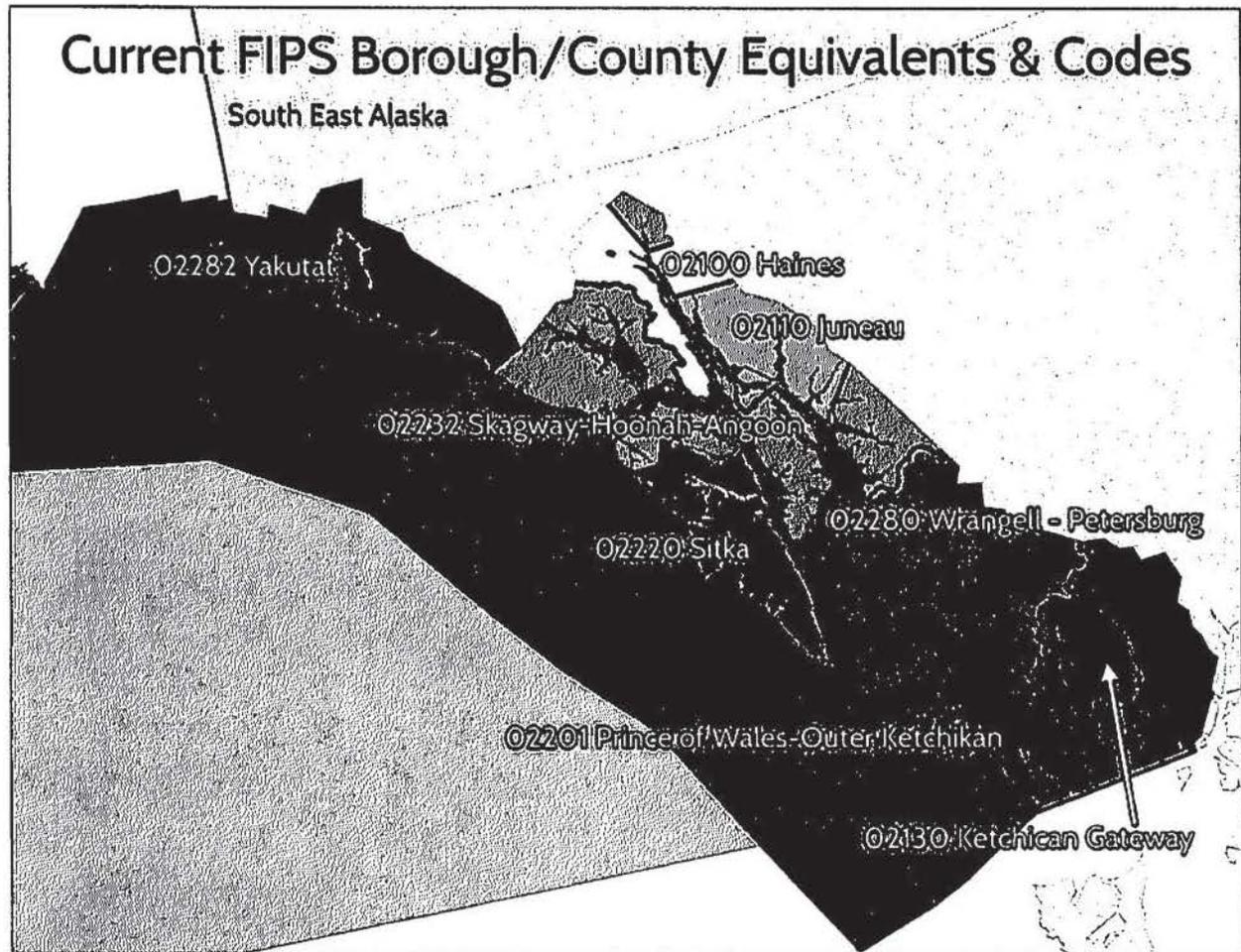
Alaska Broadcasters, the National Weather Service and Alaska Division of Homeland Security and Emergency Management will be conducting a test of the Tsunami Warning System TODAY at approximately 10:15 am.

This test will be conducted for portions of coastal communities in Southeast Alaska, the Kenai Peninsula, Kodiak and the Aleutians. You'll hear the test on the radio and see it on local and cable television.

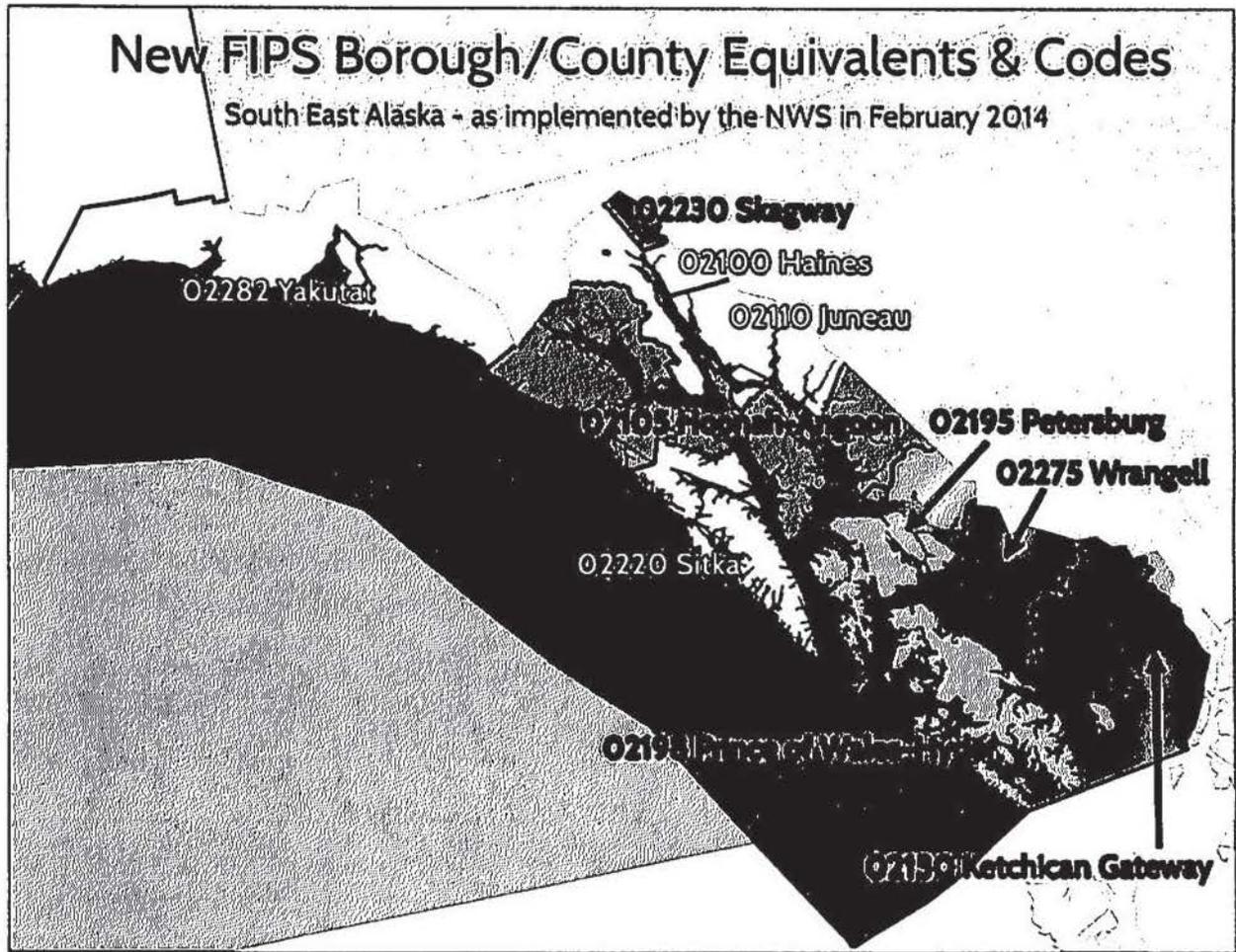
Go to ready dot Alaska dot gov to report your test reception.
This test will be cancelled in the event of any significant seismic activity.

Thank you for your participation.
Cathy Hiebert
Executive Director, ABA

Current and New Alaska Federal Information Processing Standards (FIPS) Codes



Map above shows current FIPS codes for southeastern Alaska



Map above shows new FIPS codes for southeastern Alaska in red.