



Missouri Broadcasters Association

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October 26, 2015

Mr. James W. Wiley, III
Legal Advisor, Public Safety & Homeland Security Bureau
Federal Communications Commission
445 12th Street NW
Rm 7-A769
Washington, DC 20554

Via Email

Dear Mr. Wiley,

Pursuant to 1.3 of the FCC rules, I am seeking a waiver, to the extent necessary, of any relevant sections of Part 11 of the FCC's EAS rules in order to conduct a special test of the Missouri statewide EAS system as permitted under section 11.61 of the rules. This special test of the state EAS system will be to conduct a statewide Tornado Drill at 1:30pm on Tuesday, March 15, 2016. It should be noted that if there is any chance of severe weather anywhere in Missouri that day, the special test may be postponed to Thursday March 17, 2016 at 1:30pm.

The test warning will be issued for 15 minutes. The live TOR code will be used, but test wording is found throughout the warning, follow up statements and cancellation message. This special test would not substitute for a regular weekly or monthly test as the National Weather Service believes it would nullify the purpose of the test tornado warning. Further, it is the belief of the NWS that without the live codes, the "test" information would not be relayed through law enforcement communication, thus weakening the designation of the "statewide drill".

The NWS will coordinate the statewide tornado test with all known EAS participants in Missouri. The NWS plans and prepares for "Severe Weather Awareness Week" months in advance. Through its network of contacts they will notify all public safety answering points and coordinate efforts with emergency management at the state and local levels who in turn work with their residents, businesses, and government agencies on preparedness activities.

"Severe Weather Awareness Week" and the test drill have been in existence over 30 years, and have routinely been conducted without incident. Pre-publicity includes news releases to all daily newspapers in Missouri, stories in radio and television newscasts as well as discussions on radio and television talk shows. That same information is generally put on their respective web sites. NWS also provides the information on their web site. This reminds schools, businesses, and homeowners to practice their own drills in order to better prepare for the likelihood of real life warnings properly and to be ready to respond in the event of a tornado warning in the state. Given the potential for immense harm to the public if the system is not ready when needed, these statewide tests having been conducted over the years, have doubtless contributed to the saving of many lives.

Given the importance of this mission, we respectfully request the grant of any waiver that may be necessary as expeditiously as possible to conduct the special test of the EAS system. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Gordon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark Gordon
President/CEO
Missouri Broadcasters Association
Phone: (573) 636-6692

Cc: James Kramper
Warning Coordination Meteorologist
National Weather Service, St. Louis, MO