Responses to FCC EAS NPRM 15-94 Proposals

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11.18(b)
Not all PEP stations cover their entire states, and most PEP stations, being AM stations, have extreme noise issues to deal with making their original mission difficult at best. The various state committees should be free to designate National Primary monitoring assignments in a way that allows their plan to work for their individual circumstances. FEMA IPAWS should also be included as a legitimate and accepted primary source for EAN's via CAP along with the PEP program. This would give those areas with dual EAN path issues a viable second option. It would give those with workable second path schemes a tertiary option. As the latest round of FEMA IPAWS testing has shown, the CAP aggregator system is capable of streaming audio directly to each individual participating stakeholder. It would not be unreasonable to designate the FEMA IPAWS CAP system the primary EAN source with the PEP system being the secondary source.

11.18(d)
I question the necessity of changing State Relay to Relay Station. Addition of a Relay Station designation could in some circumstances be a logical designation for a particular station that did not have statewide implications.

11.21(a)(2)
At this time the only responsibilities that are assumed to be in the purview of State Emergency Communications Committees are developing and maintaining a state wide plan of alert dissemination through broadcast and cable entities. Alert origination, and dissemination through means other than broadcast and cable, has never been assumed to be an SECC responsibility, and in reality intrudes on the duties and responsibilities of the alerting agencies themselves as well as alert commissioning agencies such as FEMA IPAWS.

11.21(a)(5)
The addition of national tests and WEA local tests to state plans would not necessarily be a negative. The dissemination of National Alerts is the primary mission of the entire EAS system. Local usage is a secondary mission. Testing for National Alerts supports the primary mission, while local tests of WEA supports the secondary mission.

11.21(a)(6)
The "One-to-Many" scheme is the primary focus of all State Plans, which is dissemination of alerts from a single input point to multiple output points. The "Many-to-One" scheme is not currently in the purview of State Emergency Communications Committees and is the duty and responsibility of those agencies which employ this feedback mechanism. Adding this "Many-to-One" information to State Plans would be extremely burdensome and of little to no value to broadcasters and cable entities.

11.21(a)(7)
The maintenance of a list of authorized alerting entities in a state by the SECC's is another burdensome concept. Should FEMA IPAWS want to maintain those lists on the web based State Plans I can see some merit as they would be the ultimate authority on who is, and is not, authorized to originate CAP messages through the FEMA aggregator.

11.21(a)(8)
An explanation of SECC duties, responsibilities, membership, and other information could be part of a State Plan with little problem if there was some definition of those duties and responsibilities. The problem lies in the foundation of SECC's themselves. There is no authorizing authority for SECC's, as they are only alluded to in the regulations. SECC's have historically been made up of either someone in a state broadcast association who assumed the duties or volunteers. Generally these volunteers were broadcast engineers who understood the vagaries required to relay messages between broadcast stations. Some were very conscientious and dedicated others not so much. The reality of the broadcast engineer today has changed dramatically and time for SECC duties is at a premium. When you have volunteers doing a job with only a vague definition, being more and more constrained by time and financial issues, giving those volunteers a clear and concise list of duties and responsibilities is absolutely necessary. A clear and concise list of duties, responsibilities, authority, and expectations will give those who volunteer their time something to take to the various agencies in their states so that the mission of the State Emergency Communications Committee can be supported. With the various changes and additional expectations being discussed in this and other NPRM's, SECC executive leadership could very well become a part or full time position.

11.33(a)(10)
Given the number of broadcasters in a state compiling and maintaining a list of Station ID (L-Code) designations could be accomplished, but would be another burden on the SECC's.

11.56(c)
I believe that FEMA IPAWS is better equipped to maintain an accurate and current list of valid alert originators for each state. This could be maintained on a web based State Plan by FEMA IPAWS.
I also believe that FEMA IPAWS and EAS encoder/decoder manufacturers should work together to make maintenance of these valid originators automatic through a push from the FEMA IPAWS aggregators. Expecting broadcasters and cable entities to manually input this information in their individual EAS encoder/decoders, in an ongoing fashion, would be folly. The number of engineers available to do this for many entities is low and would be an added expense for the broadcasters.

11.61(a)(5)
The rules proposed for Live Code testing are reasonable and mirror what is being done now.