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	)	
	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91

Directed to: Office of the Secretary
Attention: The Commission

COMMENTS OF ALASKA BROADCASTERS ASSOCIATION,
ALASKA STATE EMERGENCY COMMUNICATIONS COMMITTEE, AND
STATE OF ALASKA DEPARTMENT OF MILITARY AND VETERANS AFFAIRS,
THE DIVISION OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

The Alaska Broadcasters Association, Alaska State Emergency Communications Committee, and the State of Alaska Department of Military and Veterans Affairs, the Division of Homeland Security and Emergency Management (the "Alaska Commenters"), hereby respectfully submit their joint Comments in response to the *Notice of Proposed Rule Making*, 31 FCC Rcd 594 (2016) (the "*NPRM*"). With respect thereto, the following is stated:

The Alaska Commenters offer the following general comments in response to the issues and questions raised in the *NPRM*. The paragraph numbers noted below are references to the paragraph numbers in the *NPRM*, and the comments which follow address the matters and questions set forth in such numbered paragraphs.

Paragraph 31. In general Alaska's EAS Plan data is not considered sensitive; if the SEPFI data included specific station and equipment information (make, model, manufacturer, and firmware versions of the encoder, decoder, or translator equipment), that data should be considered sensitive and protected as required. However, that information may be a useful tool

for SECCs and technical staff to maintain an optimized system. Wherever and whenever possible, State EAS Plans and the data should be made publicly available.

Paragraph 32. Alaska Commenters believe that the re-establishment of a National Advisory Committee ("NAC") could be useful. However, it should consist of SECC Chairs, representatives of NAB, SBE, NWS, and most importantly, DHS/FEMA/NCP/IPAWS. Alaska Commenters believe that consolidated and coordinated information provided by the three primary federal agencies would yield the best results.

Paragraph 39. Alaska Commenters believe that only entities authorized at the State level should be listed in the State EAS Plan, and that local originators or authorized entities should continue to be listed in Local Operational Area Plans. In some cases, entities authorized to activate the system for local emergencies may be listed by name, rather than by position or organization, and this type of listing would place an undue burden on SECC's seeking to maintain a current list. There may be coincidental times that local or State EAS activations could take place at the same time as an EAN; however, the system is already designed to carry Presidential messages as the first priority. Due to the rare use of Presidential EAS messages, Alaska Commenters believe that such possible coincidences are not an issue.

Paragraph 40. Specification of SECC governance structure in State Plans would be consistent with other federal guidelines for the development of emergency plans. Due to the unique structure of EAS in each State, a consistent, uniform structure is likely not feasible. In as much as possible, the guidance, similar to that provided by DHS/FEMA in their Comprehensive Preparedness Guides, would assist in developing standardized and consistent State plans. Nevertheless, no specific and mandatory organizational structures should be developed; states must have the flexibility to organize local and State planning efforts consistent with other

emergency plans and the capabilities of each "volunteer committee." For example, the Alaska SECC is Co-Chaired by one broadcaster and one cable system operator, and includes each LECC Chair, State Relay Network Station representatives, the Alaska Broadcaster's Association, and multiple Federal, State, and Local EAS Origination Point members. Alaska's Emergency Management Agency serves on the committee, and performs the administrative function of plan maintenance. This structure is likely very different from that of other SECCs across the country.

Paragraph 43. The State of Alaska EAS Plan, which contains a listing of procedures and alternative alert mechanisms for the two most common statewide alerts (Tsunami Warnings and Amber Alerts), has recently been submitted. It also contains specific information related to the State's primary EAS dissemination system. However, detailed procedures and instructions for utilizing the suite of alerting mechanisms available at the State level is not contained within it. At this point, Alaska Commenters will note that in order to serve the primary purpose of EAS (transmitting a message from the President…), Alaska's alternative alert mechanisms (NOAA AHR/HAZCOLLECT, IPAWS, EMnet, AMBER/Silver Alerting Portal) do not carry EAN messages at this time. In order to effectively utilize the infrastructure and technology investments made by States, Alaska Commenters recommend that the Commission revise the Part 11 rules to require EANs and other Presidential messages across (at a minimum) the federal government's alternative alerting mechanisms (IPAWS, WEA, and NOAA AHR).

Paragraph 44. EMnet is used extensively in Alaska, and has evolved into the primary distribution path for State non-weather emergency messages. Required Monthly Test results show that, in most cases, each of Alaska's 25 SRN Stations and LP-1s receive the RMT via EMnet before messages are received through the legacy/daisy chain system. In addition, satellite distribution systems such as EMnet have the ability also to transmit and utilize content-rich alert

information within CAP. The NPR Squawk channel is not currently utilized in Alaska. As required by the Part 11 rules, however, each EAS participant is now receiving CAP formatted messages through the FEMA IPAWS alert aggregator. In many instances, participants in Alaska receive messages via IPAWS polling prior to receiving messages via the legacy/daisy chain system. Alaska has found both FEMA IPAWS and EMnet to be faster, secure, and more reliable sources of EAS reception. The Commission's EAS rules therefore should be revised to reflect FEMA-approved dissemination systems as a method of receiving Presidential Alerts. In further R&Os or NPRMs, the Commission should strongly encourage DHS/FEMA and NOAA/NWS to adopt regulations, policies, and procedures to enable the transmission of Presidential Alerts utilizing NOAA AHR, IPAWS, and other CAP Compliant, FEMA IPAWS Profile certified technologies and systems. This approach would add much needed redundancy and resiliency in the outdated Primary Entry Point system.

Paragraph 45. At this time, highway signs are substantially mechanical and analog in Alaska; their primary EAS use is limited to AMBER alerts. In cases where AMBER alerts have been issued, substantial human intervention is required, including telephone calls to legacy data entry terminals to post information on the highway signs. However, Alaska does utilize its "511" system to post AMBER alerts on both the public 511.alaska.gov and the telephonic 511 systems. Neither highway signs nor 511 are utilized to disseminate other EAS messages. Substantial investment in the overhauling or upgrading of Alaska DMS highway signs and front-end data entry systems for 511 would be required to take advantage of IPAWS-OPEN CAP-formatted alerts. The development of boiler-plate language for procurement authorities to request the incorporation of CAP-compliant systems in future system acquisitions would be helpful. Most highway signs or portable DMS signs utilized at the local level are

procured through agencies that have no real working knowledge of CAP, and therefore a requirement for CAP compliance is not found in solicitations. Social media "connectors" are utilized extensively for State and local emergency public information and alert and warnings. At this time the only direct EAS-to-social media systems in Alaska are automated postings of AMBER alerts to Facebook and Twitter feeds through a custom AMBER Alert activation portal, and through the Alaska Department of Transportation and Public Facilities' 511 entry system.

Paragraph 48. State EAS Plans should continue to divide their respective states into geographically-based operational areas; the primary benefit of this division is to support local and state-level EAS activations. Alaska Commenters disagree with CSRIC IV's notion of developing a uniformly identified national definition of operational areas. Through Alaska's recent efforts in Local Operational Area EAS Plan development, and recent update to the State EAS Plan, Alaska's EAS system has confirmed the need flexibly to define operational areas. In some instances, local ordinance and code allows for a natural definition of operational area to include RF coverage via LP-1 and NOAA AHR broadcasts ranges and political boundaries for municipalities or boroughs. A substantial portion of Alaska's 23 operational areas, however, is contained within the "Unorganized Borough," and therefore does not fit into that category. As such, operational areas have been defined not based on any government or political jurisdiction, but simply based on LP-1/2 and NOAA AHWR broadcast coverage. Through the development of Local EAS Plans in these operational areas, it is important that local alerting authorities and alert reception expectations are clearly defined. For example, the proposed Nome, Alaska Operational Area EAS Plan includes the City of Nome, and the villages of Teller, White Mountain, Gambell, Savoonga, Shaktoolik, Unalakleet, and Koyuk. This plan is based on predicted daytime coverage areas for KNOM (the LP-1) and on unique regional relationships in

the Norton Sound area. The concept of a "regional Presidential Alert" is new to Alaska, and Alaska Commenters cannot foresee a time in which the President would issue an EAN for a unique region of their State.

Paragraph 50. Alaska's EAS Plan and description of monitoring assignments all currently require one single point of failure (upstream) to monitor Presidential Alerts, the State Primary (SP), with a single Primary Entry Point (PEP) station, also designated the SP. As such, there is a definitive single point of failure for the entire system. The ability to monitor FEMA IPAWS or other CAP systems (Internet or satellite-based) would add a layer of redundancy never before seen in EBS or EAS.

Paragraph 51. Alaska's EAS Plan does not articulate many (or any) differences in monitoring assignments for local versus Presidential alerts. In all cases, Participants are required to monitor the LP-1 in their operational area, and are then afforded the opportunity to monitor a choice of other feeds available locally or from the State Relay Network. Typically, if there is coverage in their area, Participants will monitor their LP-1, NOAA AHWR, FEMA IPAWS, and either the Alaska Rural Communications System (ARCS), Alaska Public Radio Network (APRN), or the primary in-state wireline video provider (GCI Cable, Inc.). Most alternative structures (NIXLE, auto dialers, bulk e-mail, and social media) are not utilized for alerts, but for follow-on Emergency Public Information. Due to the current EAS environment, infrastructure limitations on the legacy EAS protocol, and character length for WEA and some social media services, Alerts are sent with minimal information. It is expected that local alerting authorities and both traditional/social media methods are utilized to provide further guidance once an initial alert is transmitted. In some areas of Alaska, such further input includes the use of Alaska

Native Language speakers relaying Emergency Public Information in native language and dialect.

Paragraph 56. Alaska has been a national leader in live code testing for over a decade. At this time the pending Alaska EAS Plan describes the conduct of two live code tests annually (one TSW and one CAE). The statutory authority for initiating each of these two distinct alerts is different, however. To that end, the language, public outreach, message content, feedback requirements, and other details are different. Therefore, Alaska Commenters recommend that State EAS Plans should contain information concerning scheduled live code test; however, the details should not be contained in the Plan itself. Alaska has developed a Plan lifecycle process that includes minor revisions annually (no re-approval required) and substantial edits on a quadrennial basis. Pre-test outreach procedures should be conducted in a separate format and fashion than within the Plan itself. Both codes that Alaska tests annually will likely be targeted to different geographical areas each year. It is important that the Commission not include rigid requirements within the overarching State EAS plans concerning live code testing. If the EAS rules allow EAS participants to take full advantage of content-rich information provided through the Common Alert Protocol, such information would alleviate many public panic considerations for live code testing (*e.g.*, by allowing block text or video crawl data to be identical to the aural message provided through text-to-speech technology utilized in CAP-compliant EAS devices).

Paragraph 57. Testing procedures continue to play an important role in ensuring overall system readiness, not just for Presidential Alerts but for any alert event utilized at the federal, State, or local level. If Alaska were authorized to perform specific live code or RWT/RMT testing of WEA, Alaska Commenters would likely concur that the ubiquity of smartphone

technology makes it likely that members of the public would receive any alert (not just Presidential) through WEA before legacy/traditional EAS media. There is no confidence, however, in the ability of WEA to alert the public in Alaska at this time. Without a greater frequency of WEA emergencies occurring in Alaska, and without the ability to perform live testing of this technology, Alaska Commenters do not have any metrics that allow local, State, and federal emergency authorities to assess the effectiveness of WEA within their State's wireless infrastructure.

Paragraph 58. Alaska Commenters believe that compliance with security certifications should be addressed outside of the State EAS Plan framework.

Paragraph 61. Alaska's history of live code testing has demonstrated numerous benefits. The Alaska SECC conducts and promotes live code tests as the only way to perform a realistic system verification. Due to the wide and varied capability and capacity of EAS participants and the variations in manufacturing of EAS devices, and due to Alaska's need for atypical EAS codes (*e.g.*, TSW), Alaska EAS tests have demonstrated time and again that utilizing a particular live code is critical to ensuring effectiveness in the system. As recently as Alaska's 2016 live code TSW test, a critical gap in delivering EAS messages to targeted geographic areas was discovered. This gap primarily has to do with a number of changes outside of the oversight of NOAA, FEMA, or the FCC, and specifically, the numerous changes to FIPS county codes for Alaska. The only way to discover these discrepancies is to conduct geographically targeted live code testing. In Alaska, required monthly tests are transmitted by State alert originators utilizing the "All of Alaska" SAME/FIPS code (002000); thus, state EAS officials had not discovered significant changes to the FIPS (and thereby SAME) location codes. Live code testing does promote alert originator proficiency by providing an opportunity for originators to practice

utilizing origination software by selecting specific event codes and specific geographical areas. Routine weekly and monthly testing is performed by Alaska alert originators by utilizing "quick alerts," or pre-constructed software templates. Initiating required weekly and monthly tests is a different mechanical process from selecting a real alert. Alaska avails itself of the opportunities as described in this section for "value-added" outreach and preparedness efforts, including gubernatorial proclamations, development and conduct of non-EAS drills and exercises at the local level (*i.e.*, full scale evacuation drills, tsunami and all-hazards siren exercises, and general community emergency preparedness campaigns conducted in conjunction with live code EAS tests).

Paragraph 63. The frequency of live code testing is one best determined by the SECCs and local, State, and federal alert originators within their respective states. For example, Alaska schedules two live code tests annually; Alaska Commenters believe that the need to test both the TSW and CAE codes annually is of critical importance to ensuring the effectiveness of EAS. Alaska's pending EAS Plan has been approved at the SECC level and contains information on live code testing in Alaska that was agreed upon within the EAS community. Alaska Commenters recommend that the Commission place requirements on SECCs to approve and document special or live code testing within their EAS Plans and annual test schedules. Alaska Commenters support removing the regulatory burden of requesting a waiver to promote more frequent live code testing. Any limitations on frequency of testing, however, should be managed at the level of the SECC, which is responsible for ensuring that the necessary outreach, education, and advance notice is provided for approved live code tests.

Paragraph 64. Removing regulatory burdens for EAS stakeholders would likely reduce administrative costs; Alaska specifically utilizes the Alaska Broadcasters Association legal firm

to process current waiver requests for a fee. However, the cost of implementing the best practices described in section 59 will still remain in place, and should. By requiring a description of approved periodic live code testing within State EAS plans (as opposed to individual waiver requests), the burden of documenting best practices would be spread across multiple years as EAS Plans are revised and submitted to PSHSB for approval instead of on a test-by-test basis.

Paragraph 70. The best way to ensure that EAS is more accessible is to remove the requirement to "dumb down" content - and media - rich EAS messages to the EAS-SAME protocol. By removing the requirement to display EAS header protocol information in text blocks or video crawls, and by allowing full utilization of content provided within CAP, participants can take full advantage of today's technology to ensure the aural portion of an EAS message matches visual information provided. In addition, these changes will allow participants to provide alert information to individuals with sensory disabilities or limited English proficiency.

Paragraph 72. Live code testing promotes and facilitates community engagement by supplementing larger preparedness efforts and campaigns. The inclusion of local agencies in the implementation of statewide or regional live code testing will improve the ability to facilitate inclusion of entire communities. As mentioned previously, emergency alert or emergency public information is often manually translated into Native Alaskan languages and dialects and repeated on broadcast radio facilities. Providing EAS participants a live code test that may be coupled with a full scale exercise improves the system overall. However, local agencies and officials already face overwhelming administrative burdens to plan for and conduct emergency preparedness exercises and drills, particularly when conducted with federal or state grant

dollars. Placing additional burdens on each local jurisdiction through the EAS rules is not recommended.

Paragraph 73. Alaska Commenters recommend that the Commission work directly with DHS/FEMA, DHHS/ASPR, and other federal emergency preparedness agencies to request inclusion of this type of feedback, information, and accountability into existing test and exercise requirements. For example, DHS/FEMA requires grantees to conduct exercises, and provide after action reports and improvement plans through the Homeland Security Exercise and Evaluation Program (HSEEP). Local emergency officials nationwide are already familiar with HSEEP, DHS core capabilities, and HSEEP-formatted exercise evaluation guides to conduct drills and exercises. Outreach should be conducted jointly with other federal emergency agencies to ensure the Commission's interests do not conflict with existing federal reporting requirements placed on state and local agencies.

Paragraph 93. Alaska supports the Commission's considering tablets that consumers use to access mobile devices to be "mobile devices" under the Part 10 WEA rules. Alaska Commenters foresee clear benefits to expanding access to WEA alerts on 4G LTE-enabled tablets; the more technologies and devices that support WEA reception, the higher likelihood the alert will be received by the maximum number of individuals.

Paragraph 151. Presumptively confidential reporting should be shared with other federal agencies in a manner consistent with NORS information sharing. In addition, Alaska Commenters strongly encourage the Commission to share information with SECCs, State homeland security and emergency management agencies, and LECCs. Alaska Commenters also recommend information be shared with broadcaster associations and Society of Broadcast Engineers chapters as appropriate, and with the EAS manufacturer community.

Paragraph 153. To accompany such sharing practices, Alaska Commenters suggest that the Commission require certification that a state will keep data confidential and that it has confidentiality protections at least equivalent to those set forth in the federal FOIA. Entities such as SECCs who may be authorized access to information contained within ETRS should be provided a "read-only" access.

Paragraph 154. The same level of assurance or training required for other agencies to obtain access to NORS, DIRS, ETRS, or other Commission data of a similar level of confidentiality should also be required for shared EAS information.

Paragraph 155. Providing EAS community entities (SECCs, LECCs, SBE, State HS&EM agencies, and manufacturers) with direct access to confidential information should be done without delay.

Paragraph 156. Information received by the Commission through the public domain should be treated in a manner consistent with information provided through other cumulative federal "open-source" information.

Paragraph 159. Alaska Commenters recommend that any security measures implemented by the Commission should apply to the entire system, and not be limited to portions of the system pertaining solely to Presidential Alerts.

Paragraph 176. Alaska Commenters do not believe that enough time has transpired to evaluate effectively how the Part 11 requirements to monitor the FEMA IPAWS have affected transmission times, reliability, and security. For example, Alaska is just now observing the distinct differences in speed of transmission and reception of RWT and RMT messages that originate from its dedicated, satellite-based relay network in conjunction with IPAWS message reception. WEA alerts are still an absolute uncertainty in Alaska without the ability to perform

live testing of WEA to determine market penetration. The introduction of social media alerting has been on-the-fly and ad-hoc. For example, Alaska contracted with a private alerting vendor to develop custom interfaces for social media (Facebook and Twitter) for the Alaska Amber Alert System (and Silver Alert System, a non-EAS system for missing and vulnerable adults). Alaska Commenters recommend that the Commission continue to focus its efforts on replacing the SAME/EAS protocol completely and fully embracing the CAP standard. CAP, as an open standard, should provide the flexibility to keep up with the ever-changing technological landscape.

Paragraph 177. Alaska Commenters currently see a number of issues with duplicate alerting based upon multiple transmission paths. In Alaska's current architecture, TSW alerts sent through its private, satellite-based relay network are treated as unique alerts when compared to "the same TSW" transmitted through NOAA AHWR. This type of situation must be considered in the context of IPAWS-OPEN path and legacy broadcast, or future dissemination paths. Each State Relay Network System is unique. For example, Alaska's route for statewide alerts includes a private satellite based network (EMnet), two public satellite based networks (Alaska Public Radio Network and Alaska Rural Communications Service), a private, largely satellite-based cable system (from source to regional or local headend equipment), NOAA AHWR (where transmitter coverage exists), IPAWS-over-the-Internet, and the legacy daisy chain broadcast system. Without the legacy EAS daisy-chain pathways route diversity, and therefore resiliency in the system would be substantially degraded. This issue is of critical importance in Alaska with the threat of seismic hazards. Many of the relay network systems described above have a robust combination of terrestrial and satellite-based transmission paths,

earth stations, and downlink sites, improving overall chances of the survivability of at least one path to EAS participants.

Paragraph 178. The Commission should consider maintaining both broadcast EAS systems (potentially based on CAP instead of EAS/SAME protocols) and IPAWS-OPEN-based systems.

The Alaska Commenters hereby express their agreement specifically with the Commission's following proposals and tentative conclusions.

Paragraph 21. In order to provide a consistent nationwide application, Alaska Commenters agree that the designations proposed may be used as a uniform vernacular within State EAS Plans.

Paragraph 22. Alaska has effectively utilized a cable/MVPD in its EAS system for many years. Non-broadcaster systems are key EAS sources in the State of Alaska EAS Plan and hold a key role as a "cable co-chair" in the Alaska SECC.

Paragraph 29. For purposes of both standardization and compatibility with the ETRS, Alaska Commenters suggest that a matrix similar to the Washington State EAS Plan would be useful. It is important, however, that States be afforded the flexibility to articulate other elements of the system in the base/narrative plan, and other appendices as necessary. It is as important, if not more so, to allow States flexibility in describing the purpose, function, and utility of integrated alert and warning systems for local officials and EAS participants. Alaska Commenters agree with CSRIC IV that participants be identified by FCC Facility ID and/or Physical System ID.

Paragraph 47. Alaska Commenters concur with the Commission's proposal to expand the monitoring assignments section of State EAS Plans to reflect more accurately the various methods that EAS Participants use to monitor sources for EAS. Alaska Commenters also fully support utilizing CAP-based monitoring assignments in State EAS Plans. With the current requirement for EAS Participants to monitor the FEMA IPAWS alert aggregator, the Commission must urge FEMA to develop a solution that will allow Presidential messages to be broadcast through IPAWS and to utilize CAP-formatted messages. This is, by far, the single most important method of removing single points of failure from EAS monitoring assignments. In addition, the Commission should collaborate with FEMA and NOAA in order to carry Presidential messages on NOAA All-Hazards Weather Radio. There are numerous EAS Participants in Alaska who utilize NOAA AHWR as a secondary monitoring assignment, which at this time cannot carry EAN messages, or other Presidential alerts.

Paragraph 49. Alaska Commenters strongly support the Commission's suggestion to remove the current restriction that State EAS Plans include monitoring assignments for Presidential Alerts formatted in the EAS Protocol only. As stated in numerous responses herein, the federal government should be working collaboratively to enable Presidential Alerts to be transmitted, at a minimum, utilizing both NOAA AHWR and FEMA IPAWS. Whenever possible, the Commission's rules should remain technology neutral. Alaska is well prepared to receive a Presidential Alert formatted in CAP; the rules requiring all participants to monitor FEMA's CAP feed require the ability to do so. There are documented instances in which Required Monthly Tests transmitted across Alaska's third-party EAS dissemination system (EMnet) have been picked up by IPAWS and received by participants before they received the alert through traditional means. One note of concern identified through regular testing is that

Participants must configure and enable text-to-speech capability on their legacy encoder/decoder equipment to take advantage of CAP-formatted alerts.

Paragraph 55. Alaska Commenters concur with the proposal that State EAS Plans should continue to contain procedures for special EAS tests. The State of Alaska EAS Plan (currently awaiting FCC approval) does contain specific language articulating Alaska's special "live code tests" for Tsunami Warnings and Child Abduction Emergencies. Alaska's Plan addresses procedures for RMTs and RWTs; however, it does not include specifics as to scheduling, or origination source. It does specify that the schedule will be developed well in advance of the calendar year, which advance planning affords EAS participants the opportunity to remove conflicts between on-air RMTs and important broadcast events (*e.g*. the Super Bowl). The schedule developed by the Alaska SECC, in accordance with the Alaska EAS Plan, does contain specifics as to the State alert originator initiating the test. At this time, due to the regulatory restriction on performing tests through WEA, the Alaska Plan does not address WEA testing. Alaska Commenters strongly support allowing live testing of WEA to determine commercial mobile alert providers' capability and capacity to reach the public in Alaska. If a future report and order authorized WEA testing, the Alaska EAS plan would be amended to include specific provisions for WEA testing.

Paragraph 60. As the leader in live code testing, Alaska strongly supports the Commission's recommendations proposed in this section. The requirements listed in this section, as well as the description of guidance provided to SECC's from the PSHSB in Paragraph 59, were developed based on the process utilized in Alaska for over a decade. Throughout this period, Alaska has worked with NOAA, FEMA, and the Bureau and has developed a successful method for conducting live code tests in a manner that is neither misleading nor false.

Paragraph 148. Alaska Commenters concur that data reported on an annual certification should be treated as presumptively confidential, similar to data provided in DIRS. However, in order to provide oversight at the State level, Alaska Commenters believe data provided in ETRS, and specifically data provided regarding annual certification, should also be shared with SECCs in addition to DHS or other federal agencies.

Paragraph 150. Alaska Commenters concur with the Commission's conclusion that treating information reported through ETRS, including annual certifications, false alert reporting, and lockout notifications must be presumed confidential. Again, data and information provided through ETRS should be made available to SECCs to ensure appropriate mitigation efforts are managed.

While the Alaska Commenters believe that there are many positive proposals contained in the *NPRM*, they must disagree with certain of the Commission's proposals and approaches. The following are the areas of disagreement.

Paragraph 26. Alaska Commenters disagree with the OMB EAS Plan development estimate of $25,000. Developing the first version of the Alaska State EAS Plan took well over 20 hours. In addition to the staff time to put pen to paper, there was a significant amount of time spent by the SECC membership and EAS participants in reviewing and providing feedback to create a realistic plan, well before it was ready for submission to the FCC.

Paragraph 28. Alaska Commenters would agree with adopting a standardized template if the intent were to standardize the FCC Map book portion (an end to end description/database of every EAS participant). They note, however, that nationally standardized templates are likely to be too restrictive. While the FCC's goals are to ease plan review on Commission staff and to be

able to describe accurately and assure EAN dissemination from the President, State plans have more important utility in describing the State system for local emergency managers and public safety officials and for subject broadcasters and wireline video providers within that State. History has shown that there has never been any dedicated funding streams from the federal government for planning, organization, equipment, training, or exercises when it comes to EAS. FEMA's generic response that work on EAS is an eligible item under existing DHS Grants is not adequate. The Emergency Management Performance Grant (EMPG) and the Homeland Security Grant Program (HSGP) have been reduced each federal fiscal year. Further, discrete grants such as the Interoperable Emergency Communications Grant Program have been rolled up into EMPG and HSGP, with the unrealistic expectation that somehow States can take on additional work with an overall reduction in grant funding. Since the focus of both FEMA and FCC is to ensure the States have infrastructure and plans in place to ensure EAN dissemination, Alaska Commenters believe that there should be dedicated funding to support that goal.

Paragraph 30. The Alaska State EAS Plan is distributed and posted via website to the general public, and it would be an additional cost and burden to the largely volunteer SECC to have any role in authorizing access to a secure portal to access SEPFI data for the State. As required by the FCC EAS Handbook and Part 11 rules, EAS participants must log test results and actions taken to remedy any issues with Required Monthly Tests and must document that effort in Station Logs. Providing monitoring assignment information for each participant (the Map book or proposed SEPFI) is a vital tool to allow technical staff at participating stations and systems to perform these actions. If data is required to be in a secure format similar to DIRS, we believe the burden of user and account management should be placed on the SEPFI administrators, and not SECCs.

Paragraph 41. Local EAS Plans should not be subsumed within State EAS Plans. Alaska is a home-rule State, and as such, the State Constitution establishes a policy of maximum self-government. Local Emergency Communications Committees and Local Operational Area EAS Plans are an important tool for local emergency management and public safety officials to carry out their specific warning responsibilities. If newly mandated State EAS plans and the SEPFI require SECCs to document all parts of the State EAS System, including EAS designations, monitoring assignments, etc., Local Plans should have no specific bearing on the ability to deliver Presidential EAS messages. Due to the unique characteristics of Alaska, however, it is important for local areas to maintain their own alert and warning policies, procedures, and thresholds. For example, some areas of Alaska may choose to air High Wind Warnings or Blizzard Warnings, whereas other areas may choose locally to not carry them, particularly if they do not face the same conditions. Local planning efforts have proven that decisions on local alert and warning operations, utilizing EAS facilities as one component, must be kept local.

Paragraph 62. It is unnecessary to codify specific notification procedures. The best practices, as provided by PSHSB to SECCs should be sufficient. Those practices, as listed in Paragraph 59, have been utilized for over 10 years in Alaska. Inclusive notification to PSAPs, school districts, local, State, and federal emergency preparedness stakeholders are all able to utilize notification of live code testing to reach their target demographics to provide advanced notice of the test, and additional value-added preparedness information. The utilization of pre-test public and community service announcements, manual installation of background slides indicating a test is being conducted, and post-test public and community service announcements are effective in minimizing public confusion.

Paragraph 175. It is unreasonable to keep both the legacy, broadcast-based distribution path along with the newer, Internet-based, CAP-formatted, IPAWS System. The primary redundancy and resilience in this model is simply route diversity. The failure modes between Internet-based communications and over-the-air broadcast communications are sufficiently different. Modifying the broadcast-based method, however, to replace the legacy EAS protocol with a modern CAP-formatted protocol is highly encouraged.

Paragraph 179. The Commission's timeframes as proposed are unrealistic. The magnitude of the outreach, training, and planning effort to implement such detailed changes and requirements necessitate longer lead times in order to be successful. Alaska Commenters suggest one year for new information collection requirements and two years for proposed alert authentication and validation measures. It is possible that even more time may be needed, depending on the EAS manufacturer community's capacity to implement the proposed requirements into their technology solutions.

In sum, Alaska Commenters applaud the Commission's efforts to improve the system, offer their comments on how best to achieve that goal, and look forward to implementation of the proposed changes.

Respectfully submitted,

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