

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)	

Comments

Concerning the
Notice of Proposed Rulemaking
Regarding the
Emergency Alert System

Comments of James T. Gorman, Gorman-Redlich Mfg. Co.

First, I would like to reiterate my filed comments of 14 March, 2016 regarding the propagation of malicious or accidental EAN activations. I believe that another "Billy Bones"-type event can be avoided by checking the Julian date of an incoming message against an allowable window (e.g. ± 1 day of current time). Further, inadvertent issue of an EAN by an inexperienced operator while attempting to generate a test alert might be avoided by simply removing the option of selecting the EAN event code from stations which are not designated as PEP stations. These solutions would not require any changes to the EAS Header code and would likely be inexpensive to implement.

A number of the proposals in the NPRM appear to go too far and may result in chaos for both station personnel and equipment manufacturers.

I also believe that the estimated cost of implementing the changes are far too low and do not take into account the time and resources needed for manufacturers to make equipment changes as well as fielding support calls from users as they work to meet the new requirements, in addition to the time and resources required for station personnel to upgrade equipment, learn new procedures, ensure compliance with new rules, etc.

As Kliver noted in his comments from 24 March, 2016, Low-Power FM and Low-Power TV stations seem to already bear a disproportionate financial burden from EAS requirements and that some of the proposed changes would exacerbate this. The equipment costs already represent a larger portion of Low-Power stations' budgets, many of whom do not have a full-time engineer and rely on other station personnel or manufacturer support to perform

engineering duties when budgets do not allow for a contract engineer. Kluver's suggestion is that LPFM/LPTV stations be exempt from some or all of the new requirements.

Lastly, I would like to reiterate that I am very opposed to making any changes in the middle of the FSK string to identify the year. We (Gorman-Redlich Mfg. Co.) have done internal testing with additional data at the end of the EAS header data FSK and it seems to have no effect on the operation of our unit in receiving or processing messages.