

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Part 11 of the Commission's)	PS Docket No. 15-94
Rules Regarding the Emergency Alert)	
System)	
Wireless Emergency Alerts)	PS Docket No. 15-91

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Notice of Proposed Rulemaking released January 29, 2016. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

The following is provided by Frederick R. Vobbe, Director of Engineering Broadcast Division of the Block stations¹ and Vice President and Chief Operator of WLIO-DT and WOHL-CD.

¹Full Service Stations and Class A WDRB-DT, Louisville, Kentucky; WMYO-DT, Salem, Indiana; WAND-DT, Decatur, Illinois; WLIO-DT, Lima, Ohio, WOHL-CD, Lima, Ohio and KTRV-TV, Boise, Idaho

1. Each broadcast station should submit, annually, a single page statement of "integrity" as it applies to protection of the EAS system. The statement should include the following:
 - a. Validation of the master password is complex and challenging, and state the master password is kept in a secure location. User passwords should also be validated to be complex and challenging, and changed at minimum bi-annually.
 - b. Any network attached to an EAS device should be certified to have been routinely audited to insure all patches, firewalls, and BIOS has had the latest security upgrades to prohibit unauthorized access.
 - c. Any telephone or radio interconnection to an EAS device has been routinely audited to insure integrity against unauthorized access.
 - d. The above questions could be best dealt with by a simple 1 page form with Yes/No questions. The form would be certified accurately by the licensee or local management at the broadcast station. A copy of this form shall reside with EAS records which are to be retained by a station.
 - e. I would encourage the FCC to mandate all stations to report within five business days any exploit, breach of security, or accidental or intentional transmission of EAS tones for a non-emergency. This report may be confidential from the public, but may be shared with federal authorities if an investigation is warranted.
2. Integrity and brevity are paramount to meeting public expectations.
 - a. The FCC should consider a method for making tests shorter and less evasive to program content. An RWT should be no longer than 15 seconds in length, and an RMT should be no longer than 30 seconds in length. The public gets annoyed when 2 minutes of test interrupts their station, therefore giving a negative impression of the system.
 - b. The FCC should proceed with caution in offering content viewed across different technology platforms. In many cases the technology is simply not available to guarantee integrity and service. The FCC should not mandate any platform which does not have the ability to work each and every time, and the FCC should not request stations to translate content (ie., graphical maps to spoken voice), when the technology is not

guaranteed. Such a request is a disservice to the broadcaster and the public.

3. Each community and state should perform community-based alerting exercises. This test should be simple, in English, and state what information people with disabilities can expect from the station. The text/exercise will also state where alternative emergency information may be found. TV stations should be able to direct viewers and listeners on SAP channels to local radio services.
 - a. Tests should be documented and standards set for audio SNR and clarity.
 - b. Tests should also be brief and of the utmost integrity.

CDE believes the absolute security of the EAS system is of utmost importance. CBS News today reported that “NFL Twitter Account Hacked, Falsely Tweets Out Roger Goodell Death”. Without going into details² the NFL brand is global and would have more than routine security. If this can occur, then the FCC and the broadcast industry should expect that there will be attempts to send false information on the EAS.

In the *IEEE Spectrum* dated 06.16 outlined on Page 11, an article entitled, “*The Troubled Link Between Gas and Electricity Grids*” with a subheading, “A Four-Month, 100,000 Metric-ton-Natural-Gas-Leak in L.A, Exposes Risks of Heavy Reliance on Gas-Fired Electricity”. The article states “might affect millions of utility customers for up to 14 days....”

The point is, if the natural electric utility grid is that fragile, the natural or unexpected attacks on the national electrical grid system can be expected. The article goes on to state:

“Southern California’s dilemma is indicative of the U.S. power supply’s growing exposure to gas pipeline constraints of gas fired generation has surged, recently overtaking coal as the country’s top electricity source. Unlike coal, which is

²The false notice appears to have duplicated the NFL logo.

stockpiled at power plants, natural gas is a “just-in-time” fuel. Recent efforts to model the combined dynamics of the interconnected but separately operated gas and power systems reveal other vulnerabilities across the country that could lead to power outages. “The provision of reliable service in both gas and power operates on quite a delicate balance,” says Francis O’Sullivan, director of research for the MIT Energy Initiative.”

As reported earlier, there was a rifle attack with many rounds of fire on a power substation³ in the Los Angeles area. In MB Docket No. 13-249, Comments In The Matter of Revitalization of AM Service, dated March 21, 2016, reference on Page 3 in the Footnote by Chairman Wheeler. The footnote:

“Testimony by the FCC Chairman Wheeler at the hearing before House Communications Subcommittee oversight on November 17, 2015 which provide details of 17 mysterious cuts to fibre links in and around the San Francisco Bay, California area.

The point this firm wishes to make is where governmental authorities are refining the EAS notification system to a fool-proof system, the FCC should strongly consider retaining the current Clear Channel Class A broadcast service and protection requirements.

Respectfully Submitted,



Donald G. Everist
President

DATE: June 8, 2016

³PG&E Corp.’s Metcalf substation, gunman shot 17 large transformers over 19 minutes abstracted from article in *The Wall Street Journal* dated March 12, 2014 by Rebecca Smith, entitled, “U.S. Risks National Blackout From Small-Scale Attack”