

Comments of Kenneth Evans in Regards to the Notice of Proposed Rulemaking on the  
Emergency Alert System (15-94)

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 )

**COMMENTS OF KENNETH EVANS IN REGARDS TO THE  
NOTICE OF PROPOSED RULEMAKING**

Kenneth Evans hereby respectfully submits the following comments and recommendations in response to the Public Safety and Homeland Security Bureau's Notice of Proposed Rulemaking.

From experience and concern I write these comments, knowing full well the importance of the task at hand and the limitations found in a smaller television operation in dealing with the technological changes happening today. My involvement in two different State Emergency Communications Committees, helping to create the first Maryland State plan, having been the push behind the effort to get it created, one of the researchers on how to do it, and a contributing writer for the annexes. My work for a broadcast station operating within a three state area, I am very much on the front lines of making it happen. Now I am involved with the Delaware committee and Delaware State Plan as well, working hard to provide help and training, and to keep things working smoothly. As an individual who must deal with many of these issues I will speak for myself and provide my best opinion on the topics that I have time to cover. I will try to be straight forward and to the point with my comments, but I will not be able to address every question contained within the Proposed Rulemaking document:

As found on page 19 in the item or paragraph numbered 30:  
Specifically on: "whether access to the State Plan data should be limited and secure." Much of the State plan is a public document, but there are parts that should be kept more secure and allow limited access, with access being granted only to those who need it. Parts of the plan should be redacted to keep it more secure, Those parts I believe are ones like how to activate the system, and specifics on people who provide their personal phone numbers for enabling assistance to others. Security procedures that are in place and the methods of verification of activation events. Common sense would dictate protecting emergency management personnel's personal lives and the means to activate an event if it is not specifically your responsibility to do so.

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As found on page 24 in the item or paragraph numbered 41:

Specifically on: "Do LECCs and Local Area EAS Plans provide an additional value not captured by SECCs and State Plans?"

It depends on the way Local Area is defined. If it is a question that speaks of intercommunication between multiple states and areas with a homogeneous identity, like "Washington D.C. Area, then it can be a good thing. Maryland has counties surrounding Washington that monitor both one Maryland EAS source and one D.C. EAS source. The Maryland plan considers the close proximity and movement of people to and from D.C. to involves things on both sides of the border. The Delmarva Peninsula might be very similar in places. But I have not seen any attempt at either a Local Plan or a Local Area Plan here. But communicating is the key as radio and television broadcast signals are heard and seen on both sides of the state lines. I believe it is helpful if everyone understands what is happening if an activation occurs. That way no one is blindsided with calls to 911 about what to do. I would leave it for the SECCs to decide if it is needed.

As found on page 23 in the item or paragraph numbered 39:

Specifically on the concern to: "organize and coordinate emergency alert messages should a Presidential alert be likely, and to mitigate the chaotic alerting situation that could result from a national crisis."

We will have to work that one out in the respective committee meetings, and any crisis needs to be controlled when multiple EAS messages will be needed. EAS has specific rules on how things work in the physical equipment sense. Alerts are 2 minutes. No other alert can be sent by anyone in the area during a 4 minute time period or it will likely erase the first incompleting message, and replace it with the newer one. This is something I see all the time, especially with weather events. One event interferes with the next event. And with two weather forecast offices sending alerts to just one EAS box at each station, it can happen where one message ends before completion to start the second one. I believe the NOAA Weather Radio buffers messages to deliver them by priority. EAS could have such a system, if the equipment being used can handle it.

As found on page 24 in the item or paragraph numbered 44:

Specifically on: "... propose to encourage SECCs ... satellite based source..."

All three states within the broadcast area my station serves use EMnet which is a satellite based system that provides a secure messaging system, can activate and send EAS messages, and provides the written text of the vocal message so it allows quicker crawl setup and better audio output than the daisy chain. Best of all it allows us to monitor our home state's assigned monitoring assignments and still receive EAS messages for the nearby states in our broadcast area. It is CAP based, can send alerts to the satellite, IPAWS, and WEA all at once, and it is a good secondary source for receiving IPAWS CAP messages. And I believe if FEMA provided the audio feed for Presidential messages that it could easily supplement the PEP station base throughout many parts of the country.

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As found on page 25 in the item or paragraph numbered 45:

Specifically on: (a) “we seek comment on how and whether alert originators use alternative alert distribution platforms...” and (b) “we seek comment on whether state and local use alerting tools should be included in State Plans?”

My answer is “yes.” (a) But from experience I can tell you you have to be careful on what is said and how it is said. Highway signs that say “Amber Alert” might cause panic. “Child Amber Alert” would get a better understood response. Remember text messages are truncated. SMS can not always do long messages. WEA does work. It is a real surprise the first few times you get one. (b) Yes, as a mention of the tools in the tool box. But I think it needs to be tailored to the tool being used.

As found on page 26 in the item or paragraph numbered 47:

Specifically on: “We propose to seek comment on methods to optimize monitoring assignments as implemented in the State Plan ... (a) define operational areas, and (b) CAP assignments. (c) Other resources available, (d) the extent to which State and Local Alerts differ from monitoring assignments for Presidential Alerts.

(a) If the state plan provides the operational areas in the web based State Plan, I would think that it could be cross referenced in the database to easily provide assistance to any broadcast entity who needs to make sure that they are monitoring the correct LP stations. It could be based on the city of license and area in which that city is found within the matrix. The database should also be able to create the Map Book which has always been the hardest part of creating a State Plan in my opinion. (b) CAP assignments would be IPAWS (as it is the required source). (c) EMnet, NOAA Weather Radio, CAP, LP1 and LP2. (d) No difference. LP1 and LP2, plus CAP.

Respectfully Submitted,  
Kenneth R. Evans