

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of )

Review of the Emergency Alert System )

EB Docket No. 04-296

**COMMENTS OF VERIZON<sup>1</sup>**

In examining the Emergency Alert System (“EAS”) to determine whether the EAS in its present form is the most effective mechanism for warning the American public of an emergency and any improvements that may be made, the Commission should retain the lead in creating and overseeing an effective national public warning system. In consultation with public and private sectors, the Commission should establish appropriate national standards and guidelines for states and local authorities. As the Commission considers alternative features for improving the EAS, it should also not rely on the public switched telephone network to provide targeted emergency notification and should not dictate the placement or location of EAS equipment.

1. **The Commission should establish national standards and guidelines and oversee the implementation of the EAS.** The NPRM sought comment on the recent recommendation by the Partnership for Public Warning that a single federal entity, specifically the Department of Homeland Security (“DHS”), should take the lead in creating and overseeing

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<sup>1</sup> The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc. identified in the list attached as Attachment A hereto.

an effective national public warning program. *NPRM* ¶ 22. Currently, the Commission, in conjunction with the Federal Emergency Management Agency (“FEMA”) and the National Weather Service (“NWS”), implements EAS at the federal level. *Id.* Verizon agrees with the PPW proposal that a single federal entity should take the lead in creating and overseeing an effective national public warning system. However, the Commission, not DHS, FEMA nor NWS, should retain the lead in both developing the standards and overseeing the implementation of EAS.

As the Commission has noted, an effective public warning system must take advantage of efficient and current technology in the communication of emergency messages. No other federal agency has a greater comprehensive understanding of the communication capabilities available that can implement a public warning system. Moreover, other federal agencies such as DHS, FEMA, NWS or the National Oceanic and Atmospheric Administration (“NOAA”), have little or no relationship to the broadcast industry, which is critical to both designing and implementing an emergency alert system. To be sure, the Commission should consult and coordinate with these agencies to incorporate their emergency management and informational expertise in developing the system and to designate operational responsibilities. In addition, the Commission should coordinate with appropriate state and local agencies and authorities to ensure that local concerns and effective delivery mechanisms are addressed. Finally, as it is doing now, the Commission should continue to seek industry input with respect to the capabilities of existing and developing networks and the feasibility of any proposed EAS. The Commission, however, should take the overall lead in coordinating the EAS.

In this regard, the Commission should also establish clear national guidelines for states and localities to implement. As the Commission has noted, no current guidelines or standards

exist for state and/or local EAS plans, resulting in implementation of the EAS in a “disparate manner.” *NPRM* ¶¶ 25-26. National guidelines and standards are critical to both ensuring that broadcasters, equipment manufacturers and others who must comply with the EAS are not subject to a patchwork of differing regulations and standards and that the EAS will not be subject to inconsistent implementation by state, local and regional authorities.

2. **In considering alternate public alert and warning mechanisms, the EAS should not rely on the use of the PSTN to provide “targeted” emergency notification.** The *NPRM* noted that several companies offer landline-based interactive notification systems that would convey national, regional, and local emergency messages via the public switched telephone network to wireline telephone subscribers located in the specific geographic areas affected by emergencies. *Id.* ¶ 32. Use of the PSTN, however, is not a viable option for emergency alerts. This is because most systems that could be used to enable such an alert would require enhanced customer premises equipment and switching capability. When used in conjunction with a location database, system capacity limitations preclude notification to large populations in a timely manner. Moreover, the attempted notifications result in using and typing-up vital communications channels at a time when they are needed most. Therefore, the EAS should not rely on the PSTN for timely communication of emergency alerts to large populations.

3. **The Commission should not prescribe any specific location for the placement of EAS equipment.** The *NPRM* asks whether “any centralized placement of EAS equipment, such as at the head-end of a cable system or satellite uplink, would have a positive or negative impact on the efficacy of EAS as a national, state, or local emergency notifications system.” *Id.* ¶ 42. Because the most effective and cost-efficient location for the EAS equipment will vary

from network to network, the Commission should not prescribe in advance the location for the placement of EAS equipment. So long as the network provides the functionalities and services required by the EAS, the determination of where to locate such equipment should be left to the companies deploying the networks.

Respectfully submitted,

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THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States  
GTE Southwest Incorporated d/b/a Verizon Southwest  
The Micronesian Telecommunications Corporation  
Verizon California Inc.  
Verizon Delaware Inc.  
Verizon Florida Inc.  
Verizon Hawaii Inc.  
Verizon Maryland Inc.  
Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon North Inc.  
Verizon Northwest Inc.  
Verizon Pennsylvania Inc.  
Verizon South Inc.  
Verizon Virginia Inc.  
Verizon Washington, DC Inc.  
Verizon West Coast Inc.  
Verizon West Virginia Inc.