

October 29, 2004

Tristan G. Richards  
Director of Operations  
Maine Public Broadcasting Corporation  
65 Texas Ave  
Bangor Maine 04401

Federal Communications Commission  
Washington DC 20554

RE: Notice of Proposed Rulemaking in EB Docket Number 04-296

To the Commissioners:

I would like to enter the following comments regarding improvements to the Emergency Alert System (EAS). Please let be known that I serve as Maine's SECC Chair, Maine Association of Broadcasters Chair and Maine Public Broadcasting Corporation is the manager of the state EAS. The comments submitted are the sole opinion of Tristan Richards and not of Maine SECC, Maine Association of Broadcasters or Maine Public Broadcasting Corporation.

Since the events of September 11, 2001, the EAS has received a great deal of criticism and debate. While some critics claim the system is broken, other say it was broken to be with. I on the other hand feel that the system functioned as it was designed to operate. However, increasing demands and the need for the distribution of information with reception confirmation, now make the current system obsolete.

In order for the system to evolve into a robust functioning structure that can easily adapt to social changes and technical advances. Some changes must occur.

- A lead agency must take charge of EAS. Given the makeup of our federal government, EAS authority should be placed in the Federal Emergency Management Agency.
- The current system is not designed to operate under the demands required of a fully operational system. Satellite technology with redundancy delivery methods is more suitable for today's and tomorrow's emergency communications needs.
- Given that the commission is reviewing the EAS, one can only hope that changes will be made in the system. However, if the changes become mandatory and come with a price tag. The commission should not let a revision become another unfunded mandate as it did in 1994.

Now that the commission has recognized that the EAS is need of service. Let it be standard operating procedure that the system be reviewed on a regular basis. This will allow all parties involved to keep current with technology and system

demands which will keep our country properly informed in the event of an emergency.

Sincerely,

Tristan Richards  
Director of Operations  
Maine Public Broadcasting Corporation.