

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054**

In the Matter of: }
 } **MB Docket No.: 04-296**
Review of the Emergency Alert System }

TO: The Commission

**COMMENTS OF
PAPPAS TELECASTING COMPANIES**

Pappas Telecasting Companies (“Pappas”), by and through its attorneys, hereby submits the following comments relating to the Notice of Proposed Rulemaking released on August 12, 2004.¹ The Notice proposed several modifications to the existing Emergency Alert System (“EAS”), and requested comments on these proposals. As the largest privately-owned television licensee in the United States, Pappas takes seriously the need for delivering emergency information to its viewing public.

Pappas has reviewed the Comments to be filed jointly by the Association for Maximum Service Television, Inc., and the National Association of Broadcasters (the “Joint Commenters”) in this proceeding. Pappas shares the Joint Commenters’ interest in this proceeding, and wishes to express its support for the discussion contained therein.

In particular, Pappas agrees with the Joint Commenters that the FCC should not require broadcasters to turn control of their stations over to state and local officials in the event of an emergency. Moreover, Pappas supports the Joint Commenters call for the adoption of model state and local emergency plans. Many state and local emergency managers have not adopted

¹ *Review of the Emergency Alert System*, Notice of Proposed Rulemaking, 19 FCC Rcd 15,775 (2004).

emergency plans, and the adoption of these plans would provide useful guidance. Finally, Pappas agrees with the Joint Commenters that the FCC should retain jurisdiction over broadcasters with the respect to their compliance with the EAS rules.

Therefore, Pappas Telecasting Companies shares the concerns as expressed by the Association of Maximum Service Television, Inc., and the National Association of Broadcasters, and urges the Commission to consider their comments in this proceeding.

Respectfully submitted,

PAPPAS TELECASTING COMPANIES

Kathleen Victory
Lee G. Petro

Fletcher, Heald & Hildreth PLC
1300 North 17th Street
11th Floor
Arlington, Virginia 22209
703-812-0400 – Telephone
703-812-0486 – Telecopier

Its Attorneys

October 29, 2004