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

In the Matter of	)	
	)	
Review of the Emergency Alert System	)	EB Docket No. 04-296
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COMMENTS OF HARRIS CORPORATION

Harris Corporation ("Harris") respectfully submits comments in response to the Federal Communications Commission's ("Commission") Further Notice of Proposed Rulemaking ("*FNPRM*") in the above-captioned proceeding concerning specific actions the Commission should take to help expedite the development of a more comprehensive emergency alert system ("EAS").[1]

I. Introduction and Summary

Harris is an international communications equipment company with four operating divisions that offer products and services in the microwave, broadcast, secure tactical radio, and government communications systems markets. Harris's Broadcast Communication Division is the world leader in digital solutions for television and radio broadcasting and has been at the forefront of the transition to digital television, supplying the majority of the digital television ("DTV") transmitters and encoders in the United States.

[1] *In the Matter of Review of the Emergency Alert System,* First Report and Order and Further Notice of Proposed Rulemaking, EB Docket No. 04-296, rel. November 10, 2005 (hereinafter "*FNPRM*").

In addition, Harris is the only manufacturer to offer a complete line of AM and FM digital-ready transmitters at all power levels. As a leader in digital radio, Harris is the first company in the world to offer its own high-definition ("HD") exciter and the first to incorporate correction and linearzation in the transmitter for FM HD radio, resulting in a more efficient transmission system and greater spectral purity. In addition, Harris is a leader in the development and sales of EAS encoding and de-coding equipment through its manufacturing and distribution of the Harris-Sage ENDEC product.

Harris, in concert with National Public Radio and Kenwood USA initiated the Tomorrow Radio project, a multi-year undertaking that tests and demonstrates new digital technologies and services capable of operating within the HD Radio system. A principal goal of Tomorrow Radio is to test multi-channel or "second audio" technology that could allow public radio stations to broadcast more programming and content using existing spectrum.

Moreover, Harris has been actively involved in reviewing the current EAS system in the context of the Media Security and Reliability Council ("MSRC"). Harris chaired the Communications Infrastructure Security, Access and Restoration Committee of the first MSRC and helped draft many of the best practice recommendations that emerged from MSRC I. Harris is committed to the MSRC process and is actively participating in MSRC II.

Harris commends the Commission for its First Report and Order adopting rules that expand the reach of the current EAS to cover digital communications technologies. The Commission recognized that expanding the reach of the current EAS system was a necessary short-term solution to ensuring the viability of EAS. The Commission also noted the important work undertaken by the government and private-sector to secure a long-term solution for EAS.[2] In this regard, Harris supports the Commission's goals for EAS as outlined in the *FNPRM*:

> We should have a system that enables officials at the national, state and local levels to reach affected citizens in the most effective and efficient manner possible. It should have built-in redundancy features and use a variety of communications media so that officials can reach large numbers of people simultaneously."[3]

The *FNPRM* seeks specific comments on what actions the Commission should take to help accomplish its goal—an accurate, wide-reaching public alert and warning system. Although the Commission does not have *absolute* authority over EAS, it does have specific authority to prescribe rules that establish technical standards for EAS. In addition, the Commission has authority over EAS testing protocols.[4] Harris urges the Commission to utilize its authority to lead the public and private sector in developing a

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[2] *Id.* at 16.
[3] *Id.* at 62.
[4] 47 U.S.C. §§ 151, 154(i) and (o); 303(r). See also, *Assigning Emergency Preparedness Functions to the Federal Communications Commission*, Exec. Order No. 11,092, 63 Fed. Reg. 2216 (1963).

comprehensive EAS system capable of meeting the needs of the American public.

Harris respectfully requests that the Commission consider the following recommendations: 1) The Commission should require the adoption of common alert protocol ("CAP") for EAS alerts; and, 2) The Commission should create a Federal Advisory Committee comprised of representatives from the public and private sector to focus on developing a comprehensive EAS system that will best serve the needs of the American public.

II. The Commission Should Require Adoption Of The Common Alerting Protocol For EAS And Any Future Digitally-Based Alert System.

Harris urges the Commission to require adoption of the Common Alerting Protocol, developed under the Organization for the Advancement of Structured Information Standards ("OASIS"), for EAS and any future digitally-based alert system. CAP offers a common-messaging protocol that can be used to ensure that emergency data is understood and properly interpreted by all parties responsible for generating and disseminating public warning information. An EAS system configured under CAP would be scalable and transportable across various digital media. The CAP is also the most practical means for creating an effective interface between the emergency manager and multiple emergency alert and notification systems to significantly improve national alert and warning capability.

Despite the advantages of CAP, the Commission must ensure that CAP can be effectively implemented by broadcasters. As NAB/MSTV noted, a method must be devised to ensure that CAP is carried within DTV transmissions. Harris agrees with NAB/MSTV that this work falls within the purview of ATSC and urges the Commission to work with ATSC as soon as the CAP is endorsed by the Commission. If CAP is properly adopted and deployed within digital broadcasting, the alert messaging protocol can be

inserted at the transmission point—not the program origination point.[5] As NAB/MSTV noted, this is an important factor in multi-channel and centralized broadcast operations where the program origination point is often different and substantially distanced from the transmission location.

III. The Commission Should Create An Advisory Committee Composed of Representatives From Public And Private Sector To Develop A Comprehensive EAS system.

Harris urges the Commission to create an Advisory Committee comprised of representatives from state and local governments as well as representatives from FEMA, the Commission and the Department of Homeland Security. In addition, the committee should include private sector stakeholders that would work in tandem with their government counterparts to focus on developing a state-of-the-art EAS system. Such a committee could have one-year time frame to reach a consensus and adopt comprehensive recommendations that would address issues regarding distribution mechanisms, technology, and interoperability. As the comments to the NPRM outlined, there are various technical options available for creating a new EAS system, i.e., should an EAS redundant system be a satellite-based or one based on broadcast cellular technology?[6]

The *FNPRM* delineated many of the initiatives underway exploring the use of digital and other technologies for EAS. One such program is the

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[5] Joint Comments of NAB/MSTV.

[6] Although there are no simple answers, a new EAS system should utilize multiple channels of distribution, in order to provide a high-degree of reliability and redundancy. Such distribution channels should include all broadcasting systems, such as NPR, XM Satellite, and Sirius as well as other broadcast technologies that may be developed.

Digital Emergency Alert System pilot project in the National Capital Region, with the Association of Public Television Stations ("APTS"). This pilot project has successfully demonstrated how the capabilities of America's public broadcasters can be utilized to provide the American people with critical information by "datacasting" alerts and warnings during a national crisis. APTS, in its comments to the NPRM, also highlighted the progress of many public stations that have embarked on individual initiatives to address the public safety needs of their communities.[7]

Also, the White House established "The Task Force on Effective Warnings", constituted under the National Science and Technology Council. The Task Force is composed of members representing various government agencies, including the Department of Homeland Security and the Department of Defense. The Task Force is charged with examining existing and planned disaster warning communications systems, networks and facilities to make recommendations to ensue effective disaster warning systems for the nation.

Such initiatives are laudable and may serve as examples for developing a comprehensive EAS system. However, if the Commission chartered a Committee, the work of the various pilot programs could be studied and the advantages of a particular approach could be evaluated by all the stakeholders. The benefits of such collaboration are numerous: the combined

[7] APTS Comments at 6.

experience of those serving on the committee would ensure all available information on EAS is considered and new technical approaches evaluated. The recommendations made to the Commission would serve as a blue-print for a state-of-the-art EAS system. Without such collaboration, potentially competing models may emerge, leading to incompatible systems being developed and deployed.

IV. Conclusion

Whether we are contemplating a terrorist attack, such as the tragedy of September 11 or a natural disaster, such as the onslaught of hurricanes such as Katrina, the American public deserves a technologically viable emergency communications system. The Commission has the statutory authority and the expertise to lead the development of an emergency alert system that will be compatible with both wireline and wireless technologies and will provide the American people with a state-of-the-art system that will help to save lives and property.

In order to meet this objective, Harris recommends that the Commission adopt the CAP standard and create an Emergency Alert System Advisory Committee. The committee should be comprised of members from the local, state and federal government as well as members of private sector to ensure the development of a comprehensive EAS to serve the needs of the American people.

Respectfully submitted,

HARRIS CORPORATION

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