Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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

REPLY COMMENTS OF TFT, INC.

Darryl E. Parker

TFT, Inc.
1953 Concourse Drive
San Jose, California 95131-1708

February 22, 2006

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TFT, Inc. Reply Comments Concerning the Review of the Emergency Alert System

I. INTRODUCTION

1. TFT, Inc. encourages the Commission to continue its review of Emergency Alert System by using all intelligent gateways to the public to distribute emergency information.

II. COMMENTS

2. TFT particularly agrees with the approach with several commenters including VeriSign, Inc.[1] that calls for the Commission "…to expedite availability of a more flexible, comprehensive global EAS system that includes interoperability…regardless of the underlying technology." With Common Alerting Protocol (CAP) as a top level messaging protocol that is generated and distributed by emergency message originators, information could be gleaned to generate EAS messages. Although this inter-level interface would only need to occur at some points between the message originator and the first available EAS node, the entire EAS could be utilized in its existing form without need for hardware replacement. Text messaging, desperately required by the emergency management community, could readily be realized with this type of multi-layer system with CAP at the highest level.

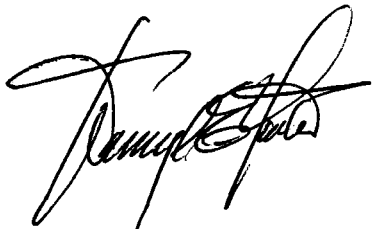
[1] *Comments of VeriSign, Inc.*, EB Docket 04-296, filed January 24, 2006.

3. TFT specifically disagrees with comments submitted by United States Geological Survey to the effect that Common Alerting Protocol (CAP) should be adopted as "…the common messaging protocol for any future digitally-based alert system[?]."[2] If CAP is adopted as a common messaging protocol for a digitally-based alert system and made mandatory for EAS alerts, then the investment that broadcasters and cablecasters have already made in an emergency alerting system will necessarily be devalued and scrapped. Now CAP can be added as a layer on top of EAS to distribute emergency messages to an existing system. If CAP is adopted as a pan-level protocol, then a crossover period will be necessary and a third system, a hybrid of existing EAS and CAP, will result.

III. CONCLUSION

4. For the above-mentioned reasons, TFT encourages the Commission to enhance the features of EAS by providing permitting CAP as a high level protocol for EAS message origination that can be folded into EAS messages to include text messaging and to discourage CAP is a common and mandatory protocol for all levels of emergency messaging, including EAS.

Respectfully submitted,
TFT, Inc.



Darryl E. Parker
Senior Vice President

February 22, 2006

[2] *Comments of United States Geological Survey*, III, Paragraph 4, Page 4, EB Docket 04-296, filed January 24, 2006.