

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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

FURTHER COMMENTS OF DIRECTV, INC.

DIRECTV, Inc. (“DIRECTV”) respectfully submits these further comments in response to the Commission’s *Further Notice* in this proceeding.¹ More specifically, these further comments discuss DIRECTV’s ability to pass through national Emergency Alert System (“EAS”) alerts consisting of foreign language audio and English language text.²

Foreign Language Audio. DIRECTV supports the goal of the Commission to ensure that “*all* Americans – including those whose primary language is not English – [are] alerted in the event of an emergency.”³ In that regard, DIRECTV is capable of passing through multiple feeds of EAS audio messages that are delivered to DIRECTV,

¹ *Review of the Emergency Alert System*, 22 FCC Rcd. 13275 (2007) (“*Further Notice*”).

² Recognizing the technical limitations inherent in satellite systems, the Commission recently declined to require DBS operators to provide localized and state-level alerts. *See id.*, ¶ 63 (“Because DBS providers also face technical difficulties in distributing alerts to portions of their subscribers, we will not at this time require DBS to provide geographically-targeted alerts, including state-level alerts.”).

³ *Id.*, ¶ 72.

with each feed in a separate language. (DIRECTV does not have the ability to originate EAS alerts, nor does it have the ability to translate such alerts itself. As far as DIRECTV is aware, no MVPD has such capability.) Thus, if National Primary stations, or any subsequent EAS system, deliver audio messages in multiple languages to DIRECTV, DIRECTV is capable of passing each of these messages to its subscribers. Moreover, DIRECTV subscribers can receive such alerts in languages other than English, if such language is provided to DIRECTV.⁴

Text Messages. DIRECTV also understands the need to “make EAS and other emergency information accessible to persons with disabilities.”⁵ In this regard, it is today able to pass through text messages in up to two languages that are delivered to DIRECTV to its subscribers with hearing disabilities.⁶ With current technology, it appears that the best way to do so would be to use DIRECTV’s existing closed captioning system to deliver these messages. DIRECTV, of course, already passes through closed captioning in compliance with the Commission’s rules.⁷ Thus, while the mechanics are not exactly the same, it should be relatively straightforward to develop a mechanism for passing through National EAS text messages in place of the closed captioning data. And, because persons with hearing disabilities generally activate closed captioning, this should be a particularly effective way to reach them during a national emergency.

⁴ DIRECTV’s set top boxes are designed to support multiple languages, although a significant percentage of DIRECTV’s older boxes can support only two languages.

⁵ *Further Notice*, ¶ 73.

⁶ *Id.* (requesting comments on “presentation of the audio feed in text format, and vice-versa”). As discussed above, DIRECTV does not have the capability of originating such messages.

⁷ 47 C.F.R. § 79.1(c).

Respectfully Submitted,

William M. Wiltshire
Michael Nilsson
HARRIS, WILTSHIRE & GRANNIS LLP
1200 Eighteenth Street, NW
Washington, DC 20036
(202) 730-1300

Counsel for DIRECTV, Inc.

/s/ _____
Susan Eid
Senior Vice President, Government Affairs
Stacy R. Fuller
Vice President, Regulatory Affairs
DIRECTV, INC.
444 North Capitol Street, NW, Suite 728
Washington, DC 20001
(202) 715-2330

December 3, 2007