

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

In the Matter of)
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Review of the Emergency Alert System) EB Docket No. 04-296
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TFT, Inc. Comments Concerning
the
Second Report and Order
and
Further Notice of Proposed Rulemaking

I. INTRODUCTION

1. These comments to the Commission’s Second Report and Order and Further Notice of Proposed Rulemaking (NPRM) to examine the Emergency Alert System (EAS) are offered by TFT, Inc., a California manufacturer of FCC Certified EAS Encoder/Decoders and Decoders and are based on the company’s experience in developing, producing, and refining EAS since its inception. Although there is room for expansion and improvement, EAS has already proved its value as a warning system for the public and continues to do so on a daily basis.

II. COMMENTS

2. Which officials should be permitted to activate EAS alerts and under what circumstances?

Only in a handful of states has effective EAS message origination been successful over the last ten years of EAS implementation. Few states have demonstrated the ability to generate and distribute EAS messages for effected areas. The principal reasons for these failures appear to be lack of planning and training. In some instances, lack of hardware and connectivity has hampered the efforts of some not only to test systems but also to disseminate actual emergencies.

State plans often lack sufficient detail for handling EAS message origination, but they do provide a structure for statewide alerting systems. Each plan is unique, but approval by the Commission should be withheld until a state can adequately demonstrate the ability to originate and disseminate EAS or CAP protocol messages.

Only those states with approved plans should be permitted to activate EAS messages.

3. Are additional performance standards necessary?

(a) Additional testing – Current requirements for testing seem adequate.

Current tests identify flaws and weaknesses within the system.

(b) Station certification of compliance – TFT's experience has been that compliance is as much a function of lack of current, accurate information as it is a function of not having EAS equipment properly operating or installed. Because many state plans are not published or approved or re-published when they are revised, EAS participants often have difficulty in determining compliance. Certification of compliance will be meaningless

without better publication of state plans and operations and monitoring assignments.

- (c) Assessment of EAS performance after an alert has been disseminated – Most states and communities already have structures in place for this assessment, and EAS participants seem willing to assess performance, particularly because of public pressures to do so. An annual voluntary report may be helpful to measure the scope and effectiveness of EAS.

5. How can non-English speakers best be served by national, state and local EAS?

Although the CAP protocol is capable of handling text and voice fields with information in languages other than English, multiple language distribution is a difficult problem. On a national basis, a given emergency message, if it were disseminated in languages other than English, would have to be delivered to a central collection point, translated, and re-distributed. This national process would have to occur on a rapid, dependable, basis and be available continuously. This could possibly involve translators in two directions for hundreds of possible languages, from one language to all the other possible languages and vice versa.

On a state level, the problem would be no easier and would require duplication of resources from state to state.

The most reasonable approach appears to be on a local, voluntary basis with available local resources. Languages tend to be concentrated in regions that are local. Media in these areas are best equipped to receive messages in one language and translate to another.

6. How can emergency messages be made more accessible to persons with disabilities?

CAP has some distinct advantages in making emergency messages accessible to persons with disabilities. The CAP protocol contains fields that can be used by many different systems to provide text, audio and video.

Many emergency managers have long been frustrated by the lack of the ability of EAS to provide detailed textual information to persons who are hearing-impaired, television viewers, and cable viewers because the details of an EAS protocol message lay in the audio portion of a message. Often this message would be broadcast a single time, which would not provide a viewer to review a message. Essential details would not be displayed but only the general information about the particular event and location, a location that had granularity only to a county level.

Present CAP-to-EAS converters possess the ability to take fields from a CAP protocol message in the form of text and provide an output to graphic systems. These fields might be text duplication of the audio details message or a graphic, such as a picture or map, that might more quickly convey information about an emergency.

Similarly, CAP-to-EAS converters can also, with the aid of text-to-speech converters, make audio information from purely text files. This is most important for emergency managers who are not adept at “voicing” messages for the general public and desire to edit text of an emergency message so that it is clear and unambiguous. A voice message is often subject to wider interpretation.

CAP protocol messages can also be originated with flags that will trigger special devices commonly used by persons with disabilities.

Messages originated in CAP protocol can be evaluated by CAP receivers to take advantage of the resources available at the receiving point. Cell phones and digital pagers can receive short text (title) messages. LAN and WAN systems can be customized to decode lengthy emergency messages or acquire information from sites specified in a CAP protocol message. The point is that an emergency message originator does not have to consider the available resources because the resources can be determined by the receiving point and re-formatted as necessary. Should the Commission specify the types of emergency alerts that local officials should be permitted to originate?

Local officials, for the most part, have less training and capability to originate emergency messages than state officials. Although there are some municipalities and local districts that do possess excellent emergency message origination capabilities, they are few in number. A state plan could identify such local entities and permit their ability to originate EAS messages. In some cases, they may be advantageous to provide necessary back-up and auxiliary facilities for a state. In other cases, state plans may identify metropolitan locations that encompass several states and cooperate in permitting local origination of emergency messages.

III. CONCLUSION

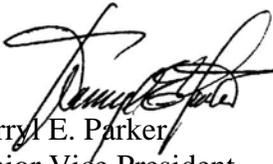
For the above-mentioned reasons, TFT encourages the Commission to enhance the features of EAS and CAP protocol messages by carefully approving only detailed state plans, by requiring no additional performance standards, by exploring local resources to provide emergency alerts for non-English speakers, by using CAP to make emergency messages

TFT, Inc. Comments
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December 3, 2007

assessable to persons with disabilities, and by only permitting local officials to activate EAS
when approved by respective state plans.

Respectfully submitted,

TFT, Inc.

A handwritten signature in black ink, appearing to read "Darryl E. Parker". The signature is stylized with a large initial "D" and "P".

Darryl E. Parker
Senior Vice President

December 3, 2007