

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

In the Matter of)	
Public Safety and Homeland Security Bureau)	
Seeks Informal Comment Regarding Revisions)	
to the Federal Communications Commission's)	
Part 11 Rules Governing the Emergency)	EB Docket No. 04-296
Alert System Pending Adoption of)	DA 10-500
the Common Alerting Protocol by)	
the Federal Emergency Management Agency)	

To The Commission:

**Reply Comments of Sage Alerting Systems, Inc.
In Response To DA 10-500**

1. Sage notes and appreciates the lively discussions from all parties involved in moving EAS forward to better serve the public interest. We stand by the statements in our May 17 comments on the request for informal comments in this matter, however, we offer these additional comments on the 180 day clock.

The Clock Start

2. Some comments, both in these proceedings and in public forums, have implied that the industry is not ready to produce equipment, and that a period of research and development must begin after FEMA's announcement of its acceptance of the various definition documents. This is not the case. CAP 1.1, and the modest changes in the CAP 1.2 specification, as well as the IPAWS Profile 1.0, have been known since last year. Indeed, the EAS-CAP Industry Group (EGIC)¹ used these documents as the basis for its recommendations for a CAP EAS Implementation Guide². Implementations of CAP 1.2 exist. Sage presented its product for testing as part of a pilot run of FEMA's

¹ EGIC works to ensure interoperability between CAP/EAS manufacturers. www.eas-cap.org

² Comments by the EAS-CAP Industry Group, May 17, 2010.

conformance tests for CAP 1.2 and IPAWS 1.0 in March. The protocols have not changed since then, and FEMA has now announced the start of formal testing to those specifications. While the formality of final acceptance of the protocols is a necessary precursor to starting the clock, product development in the industry can, and has, been progressing.

3. Another argument is that industry will not be able to produce the necessary hardware, and a delay in the start of the clock is needed. Speaking for Sage, we have been producing the hardware and software since 2008. The hardware has already been certified under the existing version of Part 11 of the Commission's rules, and the software has already been through a dry run of the conformance testing. Sage has filed the "Intent to Test" document for the formal conformance test. Although we can't speak for the others, Sage does not plan to build thousands of units, place them in the warehouse, then sit back and hope for the best. Sage will maintain a reasonable inventory, and build as orders arrive. There is no advantage to delaying the start of the clock from our point of view – no manufacturer is going to stockpile large quantities of product in advance of need.
4. Sage notes and appreciates the methodical steps the FEMA IPAWS office has been taking toward the action that will trigger the start of the clock. We don't believe they will trigger the start of the clock before the necessary elements are in place. Those elements are largely ready, with the CAP 1.2 and IPAWS 1.0 profile completed, conformance testing started, and delivery of CAP messages through a national aggregation system demonstrated³. Some work remains, such as deployment of DMOPEN 2.0, and the adoption of a FEMA Implementation Guide for CAP to EAS translation. Sage believes that these items can be ready by the time of the proposed September start of the clock, and further, that FEMA will not trigger the start of the clock until these items are ready.

³ A successful multi-vendor demonstration was held over a four day period in FEMA's booth at the April 2010 NAB show in Las Vegas.

5. Finally, we offer the reminder that CAP has been deployed in the U.S. for several years. CAP/EAS products have been on the market for many months. We don't need to let another hurricane season come and go before we take the next steps.

The End of the Clock

6. Various constituencies have commented on their desires and special requirements regarding the length of the clock. Some segments of the user base, such as wireless and cable providers, have acceptance cycles that last longer than 180 days. From the point of view of Sage's manufacturing industry, however, a lengthy delay in the end of the clock, longer than a year, will not necessarily solve any equipment manufacturing issues. Since broadcasters view EAS as an expense, and not a revenue generator, a significant percentage of EAS participants in the broadcast industry will wait until the end of the clock period to purchase equipment. If the purchase can be delayed until the next budget cycle, it will be. There will be a rush to purchase equipment that our industry will need to deal with, no matter if it is in the fifth month of a six month clock, or the seventeenth month of an eighteen month clock. Sage believes that a reasonable view toward enforcement actions, based on the prevailing conditions at the end of the nominal clock period, will be more beneficial than simply stretching out the clock. The reasonable approach worked well for the original EAS deployment in the 1996.

Respectfully submitted:

/s/

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