

The Commission has adopted an "as often as necessary to ensure compliance" with many tests and measurements that previously were required at specified intervals (frequency measurements, remote control calibrations, etc.) The same should be applied to EAS tests. Weekly tests for non-primary stations serve no purpose. No other station is monitoring them for relaying of information. Monthly tests are a distraction to listeners and if they are continued to be required, should only be relegated to overnight hours. For AM daytimers this is not an issue since the program line is interrupted to transmit the data and message. No primary station is an AM daytimer. Eliminating the requirement would allow States to formulate perhaps an annual test to verify proper equipment operation.

The deadline for CAP compliance should be extended to January 1, 2012 as many State EAS Plans have not been formulated waiting on the Commission to publish final Part 11 Rules. Such an extension would provide sufficient time to have final State plans in effect.

The two-tone alert should give way to less obtrusive, more meaningful data bursts which are more representative of today's technology.

The above would be more incentive for broadcasters to embrace the EAS system and not treat it as something they "have to do because the FCC said so".