

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

Comments in the matter of	)	
	)	
Review of the Emergency Alert System	)	DA 13-1969
	)	EB Docket No. 04-296
Independent Spanish Broadcasters Association, the Office of Communication of the United Church of Christ, Inc., and the Minority Media And Telecommunications Council, Petition for Immediate Relief	)	November 4, 2013
	)	
	)	
Randy Gehman Petition for Rulemaking	)	

Comments on Behalf of Federal Emergency  
Management Agency Integrated Public  
Alert and Warning System Program  
Management Office

**Re: PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT  
REGARDING EQUIPMENT AND OPERATIONAL ISSUES IDENTIFIED FOLLOWING THE  
FIRST NATIONWIDE TEST OF THE EMERGENCY ALERT SYSTEM**

On September 23, 2013 the FCC released a document titled “*PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT REGARDING EQUIPMENT AND OPERATIONAL ISSUES IDENTIFIED FOLLOWING THE FIRST NATIONWIDE TEST OF THE EMERGENCY ALERT SYSTEM*” which called for comment on several areas of concern as revealed by the Nationwide EAS Test conducted on November 9, 2011. The document divides the issues for comment into four areas. FEMA herein offers comments and recommendations using a similar format.

**1. Application of EAS Header Code Elements to a Presidential Alert**

FEMA encourages the FCC to join with FEMA and EAS device manufacturer’s to develop uniform processing standards for recognition, processing and response to incoming EAS messages beyond those general guidelines established in CFR 47, Part 11.

Regarding rigorous interpretation of the Initial Release Time as included in the JJJHHMM portion of the EAS Data Header FEMA encourages immediate re-transmission upon receipt of time critical messages such as, but not limited to, an EAN. This is particularly important for those EAS Participants that may serve as a monitoring source for other EAS Participants. While FEMA understands that technical plant limitations may require some EAS Participants to slightly delay re-transmission of an EAN and other

similar time-critical messages. Even in these cases re-transmission must occur in the most expeditious fashion possible.

Regarding the Location Code, FEMA renews its request for the FCC to officially establish the use of a six zero location code (000000) to indicate messages destined for all United States, Territories and Possessions. This will harmonize Part 11 with the OASIS *Common Alerting Protocol, v. 1.2 USA Integrated Public Alert and Warning System Profile Version 1.0*. FEMA realizes that full adoption of an All US location code will require modification of equipment in the field which will include legacy EAS devices, CAP-EAS devices and in some cases equipment downstream of EAS devices which might represent a hardship to some EAS Participants. In response to this FEMA suggests that devices and systems not capable of recognizing an All US location code be configured to be location agnostic for mandatory carriage messages which may contain an All US location code. For example a device incapable of recognizing an All US location code could be programmed to process and re-broadcast any received EAN regardless of the location code contained in the message header.

FEMA has received requests from representatives of the system user that the EAS system should be capable of relaying an EAN directed to a specific region of the country. The only way to accommodate this request is implementation of an All US location code.

## **2 Visual Crawl and Audio Accessibility Issues**

FEMA anticipates that this request for comment process will cause the Commission to commence a rulemaking proceeding to evaluate the visibility and utility of graphic displays of emergency information associated with EAS messages conveyed by visual media, paying particular attention to ensure that the needs of the access and functional needs community are addressed. One of the observations from the national EAS test was that screen location, font size, color and background contrast and crawl speed used for the display of emergency messages vary widely with varying degrees of legibility. FEMA looks forward to reviewing comments submitted by all interested parties regarding how best to accommodate the needs of persons with access and functional needs through the Emergency Alert System and stands ready to work with the FCC to support any recommended solutions that may be developed through this process.

## **3 National Test Event Code**

FEMA continues to support clearly mandating the relay performance of the National Periodic Test Event code (NPT) such that an NPT EAS message is relayed and forwarded in the same fashion and with the same immediacy as an EAN. NPT is currently listed as a required event without specified relay performance parameters.

At this time FEMA also requests that the Commission consider adding one or more EAS Event Codes. While not included in the request for comments document such a modification to Part 11 would need to follow the same review and comment process as any modifications which the Commission may find appropriate as a result of request for comments. Specifically requests that a code be added which would provide immediate mandatory carriage for a warning of a natural or man-made event resulting in release of radioactive material or widespread release of severely hazardous chemicals or chemical agents. In both cases immediate sheltering is essential for maximum survivability.

## **4 Impact of National Test Length on EAS Equipment**

During the period since the National Test FEMA has been told of several situations in which the short length of the message associated with the National Test did not allow sufficient time for various

downstream components within the systems used by some EAS Participants to fully respond. FEMA looks forward to learning from comments submitted in response to questions on this subject.

## **5 Future Testing**

FEMA proposes to conduct a test of the entire Integrated Public Alert and Warning System (IPAWS) in the near future. Such a test would necessarily include testing the national EAS system as an IPAWS component. This proposed test may utilize any FCC approved EAS message code as is deemed appropriate at the time. The proposed test may be conducted as a single simultaneous nationwide event as was the November 9, 2011 Nationwide Test or it may be conducted on a regional basis as are the FEMA IPAWS originated CAP EAS RWTs. FEMA will continue to work with industry and the FCC as the parameters of the next Nationwide Test are established.