

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Improving the Resiliency of Mobile Wireless Communications Networks	)	PS Docket No. 13-239
	)	
Reliability and Continuity of Communications Networks, Including Broadband Technologies	)	PS Docket No. 11-60
	)	

**REPLY COMMENTS**

Media General, Inc. (“Media General”), by its attorneys, hereby submits reply comments in response to the *Notice of Proposed Rulemaking* (“NPRM”) released by the Federal Communications Commission (“FCC”) in the above-referenced proceeding and in support of the initial comments filed on January 17, 2014, by the Mobile EAS Coalition.<sup>1</sup> In its comments, the Mobile EAS Coalition responded to the FCC’s request for information on alternative or complementary measures for improving wireless network reliability; it described the Mobile Emergency Alert System (“Mobile EAS”), a next-generation, dual-use public alert and warning system reliant on mobile digital television (“Mobile DTV”), and urged the FCC to take a broad, integrated approach to improving performance of the wireless broadband network, one that encompasses consideration of Mobile EAS. Because Mobile EAS provides an additional means for communicating with the public during times of crisis, and, as such, meets the FCC’s goal of

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<sup>1</sup> *Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies, Notice of Proposed Rulemaking*, PS Docket Nos.13-239 and 11-60, rel. Sept. 27, 2013, 78 Fed. Reg. 69018 (Nov. 18, 2013). See Comments of the Mobile EAS Coalition in PS Docket Nos. 13-239 and 11-60 (Jan. 17, 2014).

creating more reliable and robust emergency communications networks, Media General also believes the FCC should embrace and foster Mobile EAS deployment.<sup>2</sup>

Media General supports the FCC and the Mobile EAS Coalition in their efforts to identify and develop complementary, alternative communication methods for use in emergency situations. Broadcasters already serve a key role in transmitting critical emergency information from the Federal Emergency Management Agency through existing Emergency Alert System (“EAS”) protocols with traditional television broadcasts. Mobile EAS proposes to use spectrum already allocated to broadcast television to provide similar emergency messages to mobile devices through the use of Mobile DTV. Mobile EAS allows television broadcasters to extend their provision of critical and essential information beyond a viewer’s home to any location where viewers may be using mobile devices to receive Mobile DTV signals.

Broadcast television, with its “one-to-many” architecture, is an extremely efficient and reliable means of disseminating emergency information. International Telecommunications Union Secretary-General Hamadoun I. Touré recently acknowledged the value of this one-to-many approach, noting “[e]mergency broadcasting plays a critical role in the rapid dissemination of information to the public, and is a key element in helping save lives in the aftermath of natural disasters....”<sup>3</sup> As the ITU publication continued, “due to their wide coverage, broadcasting services are more likely to survive such events than other communications networks.”<sup>4</sup> Unlike

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<sup>2</sup> Media General takes no position on the NPRM’s proposal that facilities-based Commercial Mobile Radio Service providers report the percentage of operational cell sites during and immediately after major disasters in counties where the FCC has activated the Disaster Information Reporting System on a daily basis for publication by the FCC.

<sup>3</sup> Press Release, International Telecommunications Union, Broadcasting Is Key Communication Medium in Emergencies (Nov. 29, 2013), *available at* [http://www.itu.int/net/pressoffice/press\\_releases/2013/68.aspx#.UwIzkvldVKY](http://www.itu.int/net/pressoffice/press_releases/2013/68.aspx#.UwIzkvldVKY).

<sup>4</sup> *Id.*

carriers relying upon one-to-one messaging architectures, broadcasting conveys information from one transmission source to everyone with an antenna and a screen in a station's local market.<sup>5</sup>

Moreover, because of the broadcast industry's prevalent investment in back-up power facilities, broadcast stations can be counted upon to be the "last system standing" during most emergencies. In response to the September 11, 2001 terrorist attacks, the Media Security and Reliability Councils I and II recommended that all broadcast facilities have large supplies of back-up power.<sup>6</sup> As the Mobile EAS Coalition noted, many broadcasters have followed up with large reserves of fuel for generators.<sup>7</sup> In addition, in 2006, Congress adopted the Warning, Alert and Response Network (WARN) Act of 2006 providing further funding to noncommercial broadcast television stations for installation or upgrade of their back-up power facilities.<sup>8</sup>

The FCC itself recently acknowledged the reliability of broadcasters during emergency situations:

[i]n emergencies that result in outages of power, cellular telephone service, or Internet connectivity, IP-based services like CAP-based alerting systems may not

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<sup>5</sup> "Radio and television broadcasting provides reliable point-to-multipoint delivery of essential information and safety advice to the public as well as to first responders and others via widely available consumer receivers, both mobile and fixed. Even in cases where electricity and mobile-phone base stations are no longer available, reception of broadcast signals is still possible with battery-operated receivers in cars and in hand-held devices such as mobile phones equipped with a radio or TV receiver." *Id.*

<sup>6</sup> See Media Security and Reliability Council, MEDIA SECURITY AND RELIABILITY COUNCIL LOCAL TELEVISION STATION MODEL DISASTER RECOVERY PLAN & INCIDENT RESPONSE MANUAL (Nov. 30, 2005) available at [http://www.mediasecurity.org/documents/TV\\_DRP\\_v1\\_0\\_Final\\_Release.pdf](http://www.mediasecurity.org/documents/TV_DRP_v1_0_Final_Release.pdf). See also Media Security and Reliability Council, Adopted Best Practices Recommendations (May 28, 2003) available at [http://www.mediasecurity.org/documents/MSRC\\_I\\_Best\\_Practices.doc](http://www.mediasecurity.org/documents/MSRC_I_Best_Practices.doc).

<sup>7</sup> Comments of the Mobile EAS Coalition at 4.

<sup>8</sup> Warning, Alert, and Response Network Act, Pub. L. No. 109-347, 120 Stat. 1884, 1936 (2006).

be available, and the broadcast-based legacy EAS may be the only reliable means of disseminating emergency alerts to the public, because messages can be received on battery power radios and televisions.<sup>9</sup>

The resiliency of broadcasting, premised on the industry's back-up power facilities and its one-to-many architecture, could be even more effective in emergencies through use of Mobile EAS.

One of the FCC's own advisory committees has reported on the great benefits of Mobile EAS. In 2013, the Communications Security, Reliability and Interoperability Council III ("CSRIC III") adopted two relevant recommendations. First, CSRIC III recommended that the FCC promote the use of open-source software to facilitate the transmission of information to the public, including through the use of Mobile EAS.<sup>10</sup> Second, CSRIC III recommended that the FCC discuss with industry how Mobile EAS could be used to disseminate emergency information to mobile devices.<sup>11</sup> In 2012, with the support of the Corporation for Public Broadcasting and LG, one commercial and three noncommercial stations implemented trials of Mobile EAS.<sup>12</sup> Since that time, at least two additional stations have demonstrated or pledged to conduct Mobile EAS trials.<sup>13</sup>

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<sup>9</sup> Review of Emergency Alert System, 27 FCC Rcd 642, 654 ¶ 27 (2012).

<sup>10</sup> See The Communications Security, Reliability and Interoperability Council, Working Group 2, NEXT GENERATION ALERTING FINAL REPORT 53 (Mar. 2013), *available at* [http://transition.fcc.gov/bureaus/pshs/advisory/csric3/CSRIC\\_III\\_WG2\\_Report\\_March\\_%202013.pdf](http://transition.fcc.gov/bureaus/pshs/advisory/csric3/CSRIC_III_WG2_Report_March_%202013.pdf).

<sup>11</sup> *Id.* at 55.

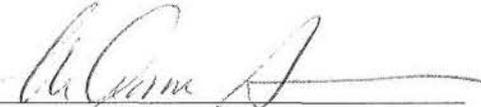
<sup>12</sup> Press Release, Mobile EAS Coalition, "Public Television Leading the Way on Mobile Digital TV Emergency Alert System" (Feb. 1, 2012), *available at* [http://mobileeas.org/wp-content/uploads/2013/06/APTS-M-EAS-Handout.2.2012.FINAL\\_.pdf](http://mobileeas.org/wp-content/uploads/2013/06/APTS-M-EAS-Handout.2.2012.FINAL_.pdf).

<sup>13</sup> See Press Release, Mobile EAS Coalition, "WRAL-TV Becomes First Commercial TV Station in U.S. To Demonstrate Mobile Emergency Alert System" (Sept. 20, 2012), *available at* <http://mobileeas.org/wp-content/uploads/2013/06/WRAL-SEPT-20-2012.pdf>. See also Press Release, Mobile EAS Coalition, "WHUT-TV Becomes First TV Station in Nation's Capital to

The FCC has long recognized the importance of providing emergency communications to the public. The use of Mobile EAS during emergency situations would further this goal, and Media General encourages the FCC to promote Mobile EAS and take all action necessary to encourage its use.

Respectfully submitted,

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Support New Mobile Emergency Alert System” (Sept. 20, 2012), *available at* <http://mobileeas.org/wp-content/uploads/2013/06/WHUT-M-EAS-FINAL-092012.pdf>.