

**Before the  
Federal Communications Commission  
Washington, D.C. 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 of the Mobile500 Alliance**

The Mobile500 Alliance (“Mobile500”) applauds the Commission’s continued efforts to improve the nation’s emergency communications capabilities. Mobile500 appreciates the opportunity to add to the Commission’s policy discussion to ensure that it is broadened to consider the complementary functionality that Mobile EAS (“M-EAS”) offers to the public.

Currently, fifty members comprise the Mobile500 Alliance, which, in the aggregate, hold licenses to operate more than 430 television stations. The digital signals of these television stations reach nearly 95 percent of all television households in the United States.<sup>1</sup> Nearly every American—irrespective of the identity of their wireless carrier, the operational status of any cellular site, or the duration of a cellular outage or overload—is “covered” by a Mobile500 television station signal.<sup>2</sup> For the past few years, members of the Mobile500 have been at the forefront of the technological innovation that is M-EAS.

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<sup>1</sup> See <http://mobile500alliance.com/>.

<sup>2</sup> A map depicting the signal coverage of Mobile500 members is available at <http://mobile500alliance.com/members/>.

Mobile500 endorses the views set forth in the comments filed in this proceeding by the Mobile EAS Coalition, which advocate that the Commission consider the valuable and unequalled public interest represented by M-EAS.<sup>3</sup> At an earlier point in this proceeding, the National Association of Broadcasters also filed comments touting the advantages of M-EAS.<sup>4</sup> To that end, Mobile500 also urges the Commission to approach the issues in this proceeding holistically and recognize that the resiliency and reliability of wireless communications networks is only one piece of the overall puzzle. M-EAS provides an important additional puzzle piece, which can operate in parallel with wireless carrier text-based alerting mechanisms.

By using terrestrial “over the air” television broadcasting, rather than cellular network connectivity, M-EAS can meet critical needs for emergency alerts, especially in times that cellular networks are overloaded or otherwise compromised by widespread or localized disaster circumstances. The complementary or “in tandem” approach represented by M-EAS is well-described in the Coalition Comments:

M-EAS not only provides a powerful and highly reliable communications pathway for the public and first responders, its deployment also would help meet the Commission’s goals of improving the reliability and resilience of the wireless broadband network itself. That’s because the more that people are able to turn to M-EAS as an information source during an emergency event, the more available cellular spectrum will be reserved for one-to-one voice and text communication. This, in turn, will allow more

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<sup>3</sup> See Comments by the Mobile EAS Coalition (filed January 17, 2014) (“Coalition Comments”).

<sup>4</sup> See *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, Comments of the National Association of Broadcasters, PS Docket No. 11-60 (filed August 17, 2012) (“NAB PS 11-60 Comments”), p.8 (“M-EAS offers several benefits, including the one-to-many architecture of broadcasting; the ability to receive timely, critical warnings while on the move; and access to technologies previously unavailable to broadcasters, such as geo-targeting and delivery of non-real-time (NRT) data that can supplement warnings with other valuable information.”).

individuals to communicate with loved ones and first responders. M-EAS and cellular, working in tandem, provide for the “highest and best use” of spectrum.<sup>5</sup>

In turn, this “tandem” approach will, to echo the words of the Mobile EAS Coalition, foster the continued build-out of the IPAWS “network of networks.”

On this point, Mobile500 itself has previously observed that broadcast technology’s one-to-many architecture, when leveraged by wireless carriers and mobile device manufacturers, could deliver emergency messages to millions of devices simultaneously, even when the operation of a point-to-point wireless network has been impaired and overburdened by a natural or man-made disaster.<sup>6</sup> Concomitantly, the fewer individuals that are relying at these critical times on the wireless cellular networks, the greater their availability and resiliency will be.

In short, the tools and technology exist to alleviate some of the fragility of cellular networks in times of crises and critical needs: television broadcasters offering Mobile DTV and M-EAS services. M-EAS deployment promises to add an additional method for public alerts and warning. By using the existing television broadcasting infrastructure and Mobile DTV, members of the public will be able to receive, via M-EAS, actionable, rich-media content, including audio, video, evacuation and other maps, photos and other images, html pages, and text to mobile phones, tablets, and other devices without burdening the cellular wireless network. This “one-to-many” capability is highly reliable, and would enhance current efforts to keep the public safe in

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<sup>5</sup> Coalition Comments, p.3.

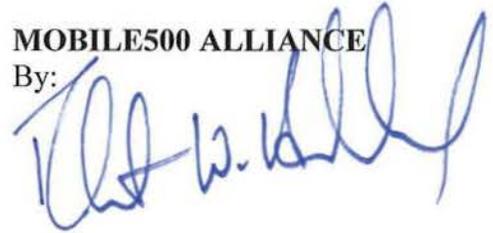
<sup>6</sup> See *Applications of AT&T Inc. and Deutsche Telekom AG*, Comments of the Mobile500 Alliance, WT Docket No. 11-65 (filed May 31, 2011), p.3.

times of disasters and public emergencies, without regard to the resiliency or operational status of any cellular site or wireless network.<sup>7</sup>

Respectfully submitted,

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<sup>7</sup> *Accord* NAB PS 11-60 Comments, pp.3-4 (“[T]he ‘one-to-many’ architecture of broadcasting is more robust than the ‘one-to-one’ architecture of other platforms. Delivery of critical information must be reliable during heavy usage, which typically occurs during crises. Broadcast networks cannot be overwhelmed, unlike other platforms such as mobile phones . . .”).

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