

February 19, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Review of the Emergency Alert System, EB Docket No. 04-296*

Dear Ms. Dortch:

Comcast Corporation (“Comcast”) files this letter in follow-up to recent discussions with staff of the Public Safety & Homeland Security Bureau regarding the above-captioned proceeding.¹ In those meetings, we discussed potential changes to the Emergency Alert System (“EAS”), including the addition of a Nationwide Location header code, as well as proposed modifications to the National Periodic Test (“NPT”). Staff inquired what the technical, cost, and timing implications would be for Comcast if these changes were adopted. This letter responds to these questions.

Nationwide Location Header Code. Staff inquired about the impacts of adopting a Nationwide Location header code. To the extent any such requirements mandate that downstream EAS equipment filter an Emergency Action Notification (“EAN”) based on a Nationwide Location header code, new equipment would be required in some circumstances, thereby resulting in sizeable capital expense. Comcast would also incur operational costs in developing, testing, and deploying new code in our downstream EAS equipment. Comcast estimates that it would take at least one year from adoption of the rules to fully upgrade impacted systems to implement a Nationwide Location header code. Staff also asked about the effects of adopting a Nationwide Location header code, but not requiring operators to swap out legacy EAS equipment that is unable to recognize and process the new code. In such a scenario, Comcast would not incur the capital expenses associated with changes to our EAS equipment as described above, but would incur the same level of operational expenditures associated with developing and testing the new code, and Comcast further anticipates that deployment of such changes would similarly require at least one year to deploy.

¹ See Letter from James R. Coltharp, Comcast Corporation, to Marlene H. Dortch, FCC, EB Dkt. No. 04-296 (Feb. 3, 2014); Letter from James R. Coltharp, Comcast Corporation, to Marlene H. Dortch, FCC, EB Dkt. No. 04-296 (Feb. 6, 2014).

National Periodic Test Modifications. Staff also inquired about the effects of adopting the proposed modifications to the NPT. Such modifications would have more significant impacts on Comcast as compared to adoption of just the Nationwide Location header code. In particular, any modification to the NPT, beyond filtering a location code, would necessitate updates to the SCTE-18 standard. In turn, all devices that rely on that standard would need to be updated, dramatically broadening the operational impacts. Any modifications to the NPT also would result in sizeable capital and operational expenditures. Comcast estimates its capital expenditures would likely be similar to the capital expenditures associated with requiring EAS equipment to filter the location code for an EAN. Comcast further estimates its operational expenditures for making any proposed modifications to the NPT would likely be four to five times the operational expenditures required to implement the Nationwide Location header code due to the larger number of downstream devices affected by such a change, as well as the need for more extensive code development, testing, and trials, along with a longer deployment time frame.

In addition, the updates to the SCTE-18 standard and corresponding modifications to Comcast's architecture would not be done in parallel. Rather, the updates to the standard would have to be completed before Comcast could proceed with changes to its design implementation. Consequently, Comcast estimates that it would take significantly longer than one year to fully implement modifications to the NPT. It bears noting that this would be the case regardless of the number of proposed modifications the Commission makes to the NPT beyond the single addition of filtering the location code (e.g., immediate activation of alert, duration of alert, etc.).

Finally, staff inquired about the potential cost impacts of adopting accelerated compliance deadlines for the Nationwide Location header code and/or NPT modification proposals. We expect that such accelerated deadlines would result in higher implementation costs relative to those discussed above. Moreover, an accelerated time line could increase the potential for errors in implementation.

Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ James R. Coltharp

James R. Coltharp

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cc: Greg Cooke
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