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March 13, 2014

Ms. 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:

In follow-up to recent discussions that the National Cable & Telecommunications Association ("NCTA") has had with staff in the Public Safety and Homeland Security Bureau regarding potential changes to the Emergency Alert System ("EAS"), NCTA submits the following additional information in the above-captioned proceeding. This letter also incorporates by reference the information provided by NCTA on equipment and operational issues in an *ex parte* filed in this docket on January 17, 2014.

Nationwide Location Header Code

Bureau staff inquired about the technical and cost impact for cable operators to adopt a nationwide location code (i.e. 000000) to ensure uniform delivery of the Emergency Action Notification ("EAN") across the nation. To implement this change, operators must undertake a multi-stage process to assess the impact on the cable infrastructure from the encoder/decoder equipment to downstream equipment. The number of stages depends on each cable system's configuration. Starting with the encoder/decoders, the addition of the nationwide location code may require a software and/or firmware upgrade that would require testing and evaluation to determine the impact of the code change before implementation. In systems with legacy EAS equipment not able to recognize a new code, the operator would have to purchase and install new EAS equipment. We estimate that it would take an additional 90 days to order and install this new EAS equipment at an approximate cost of $3500 per location.

The next stage involves developing and testing the new code for downstream equipment, particularly digital set-top box controllers which filter location codes for processing EAS alerts by service location. Given the complexity of the functions performed by this equipment and its critical role in the functioning of cable customers' set top box equipment, the development and testing process is significantly more time and resource-intensive than the encoder/decoder review process and any subsequent modifications. Moreover, for cable operators with equipment from multiple EAS manufacturers, testing and analysis must be done for not only each type of equipment but each permutation of EAS encoder/decoders in combination with each set-top box controller or other downstream platform. And, depending on the size of the cable company, the

final stage may involve testing in a trial market before full deployment. Cable operators understandably exercise great care in testing new software releases before deploying on a wide-scale basis to their customers. This is critical to maintaining a quality customer experience, as defective software releases may disrupt set top box functionality or worst case cause outright failures.

Based on NCTA's discussions with EAS engineers in our member companies, we estimate that the aggregate capital and operational cost of deploying a new nationwide location code is approximately 1.1 million dollars for approximately 85 percent of cable customers. However, there are many variables for each cable system so this is just an industry cost estimate. It also reflects a best case scenario; the cost would increase significantly if problems were encountered that required more lab time and resources. With regard to timing, as NCTA previously noted in its January 17, 2014 *ex parte*, our companies uniformly reported that at least one year is needed to deploy the new location code effectively once it is adopted by the Commission. To minimize cost, the preference is to make this change during scheduled periodic annual equipment review/upgrade cycles.

National Periodic Test Code

Bureau staff also asked for greater detail on the effects of utilizing the National Periodic Test (NPT) event code for national EAS tests. As NCTA previously noted, the NPT event code has never been used so operators have no operational experience with it. Based on our discussions with member company engineers, requiring the NPT to filter location codes, trigger immediately upon receipt, and last beyond two minutes is far more complex and costly to implement than the addition of the nationwide location code. First, it would require changes to the SCTE18 2013 standard before corresponding product specifications and system design changes are made.[1] Based on prior standards renewal cycles, we estimate the process necessary to update SCTE 18 2013 could take as long as one year to complete. Once the revised standard is completed, operators may then undertake the testing, analysis, trial and deployment stages of the process.

We estimate the cable industry capital and operational cost to modify and implement the NPT for national testing to increase approximately four-fold over the cost to deploy a new nationwide location code, or approximately 4.4 million dollars for approximately 85 percent of cable customers. This significantly higher magnitude in cost is attributable to the larger number of downstream devices affected by the change, as well as the need for more extensive code development, testing and trials. In addition, some operators may need to purchase new encoder/decoders to support the modified NPT. As with the nationwide location code, the NPT code cost estimate reflects a best case scenario; expenditures could increase significantly if problems were encountered that required more lab time and resources. The whole process – from standards update to implementation – could take up to three years.

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[1] SCTE 18 2013, also known as ANSI J-STD-42B-2013, is a standard that defines an Emergency Alert signaling method for use by cable systems to signal emergencies to digital receiving devices.

Finally, the Bureau staff discussed with NCTA the importance of achieving a consistent regulatory approach to EAS over an ad hoc interim approach to the handling, routing and security of EAS alerts.

Sincerely,

/s/ Loretta Polk

Loretta Polk

cc: Tom Beers
Gregory Cooke