

COVINGTON & BURLING LLP

BEIJING BRUSSELS LONDON NEW YORK
SAN DIEGO SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

1201 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004-2401
T 202.662.6000
www.cov.com

March 24, 2014

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: PS Dockets No. 13-239, 11-60 -- Ex Parte Submission

Dear Ms. Dortch:

Pearl Mobile DTV Company, LLC (“Pearl”),¹ which was formed to explore innovative use of broadcast spectrum, agrees with the Mobile EAS Coalition and the Mobile500 Alliance that the Commission should consider the unique benefits of the Mobile Emergency Alert System (“M-EAS”), which can use mobile digital television to deliver multimedia alerts and warnings instantly to a potentially unlimited number of individuals without any strain on mobile wireless services.²

In times of emergency, it is important to make the best use of every tool available. As such, in this proceeding the Commission should focus not only on mobile wireless communications but also on other useful and innovative means of emergency communications, including M-EAS.

During emergency situations, demand for information spikes. Because M-EAS relies on one-to-many television broadcasting, it can match any scale of demand without difficulty to give affected individuals the key information they need. It can provide multimedia content to consumers, including “video, radar images and evacuation maps; local news and weather coverage; text, photographic, or pictorial instructions in a given emergency; and shelter location information and more.”³ M-EAS does not require additional

¹ Pearl’s members are Cox Media Group, E.W. Scripps Co., Gannett Co., Inc., Hearst Television Inc., Media General Inc., Meredith Corp., Post-Newsweek Stations, Inc. and Raycom Media Inc. Pearl is a member of the Mobile Content Venture, LLC.

² See Comments of the Mobile EAS Coalition, PS Docket No. 13-239, PS Docket No. 11-60 (Jan. 17, 2014) (“M-EAS Coalition Comments”); Reply Comments of the Mobile500 Alliance, PS Docket No. 13-239, PS Docket No. 11-60 (Feb. 18, 2014). (“Mobile500 Reply Comments”).

³ M-EAS Coalition Comments at 3.

Ms. Marlene Dortch
March 24, 2014
Page 2 of 2

spectrum, and it can be deployed through marginal investments in infrastructure.⁴ Not only is M-EAS highly beneficial in its own right, its deployment also would improve the reliability of mobile wireless services during emergencies. M-EAS can operate simultaneously with and complement one-to-one communications via mobile device and wireless emergency alerts without hindering those communications. Freed from strain from users who are able to obtain the information that they need from M-EAS, mobile wireless networks would be more reliably available to individuals who need to engage in one-to-one communications, such as contacting first responders or loved ones.⁵ M-EAS also can reduce pressure on public safety networks used for two-way communications by delivering multimedia information specifically to first responders.⁶

Television broadcasters serve the public by providing information during local, regional, and national emergencies, and Americans continue to turn first and foremost to broadcasters for emergency information. Further, over its many years of use and improvement, broadcast service has become highly reliable. For example, as the Mobile EAS Coalition noted, “nearly all television broadcast transmitters stayed on the air before, during and after Superstorm Sandy struck, regardless of whether or not their transmitters continued to receive power from the grid.”⁷ M-EAS extends the benefits of high-quality and ubiquitous broadcast service to Americans who are away from home or who have lost power.

* * *

In sum, Pearl urges the Commission to pursue the benefits of M-EAS, which can reduce pressure on overextended mobile wireless services during emergencies and ensure that more Americans will receive crucial, potentially life-saving information reliably and instantaneously without limitations due to scale. Please direct any questions to the undersigned.

Respectfully submitted,



Kurt Wimmer
Daniel Kahn
Counsel for Pearl Mobile DTV Company, LLC

⁴ *Id.* at 2.

⁵ See Mobile500 Reply Comments at 3 (“[T]he fewer individuals that are relying at these critical times on the wireless cellular networks, the greater their availability and resiliency will be.”).

⁶ M-EAS Coalition Comments at 3.

⁷ *Id.* at 4.