Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Review of the Emergency Alert System	)	EB Docket No. 04-296
	)	
Independent Spanish Broadcasters Association, the Office of Communication of the United Church of Christ, Inc., and the Minority Media and Telecommunications Council, Petition for Immediate Relief	)	

COMMENTS OF AT&T[1]

AT&T fully supports the Commission's goal in this proceeding to develop processes that will enable the widest possible dissemination of emergency alert information. Before "refreshing the record" about how best to accomplish that goal, AT&T will reiterate certain core principles that remain as true today as they were when AT&T described them in 2007 and 2011:[2]

- The Commission must continue to recognize – as it did in the *Wireline EAS Order* – the increasing divergence in communications and transmission technologies employed by Emergency Alert System ("EAS") participants.[3] For example, AT&T's IPTV system ("U-verse") significantly differs from traditional cable, QAM-based video distribution systems. Those differences include substantially disparate means of effectuating EAS. Accordingly, the Commission must ensure that any new EAS requirements will

[1] AT&T Services, Inc., on behalf of the subsidiaries and affiliates of AT&T Inc. (collectively, "AT&T"), respectfully submits these comments in response to the Public Notice of the Public Safety and Homeland Security Bureau ("Bureau") seeking to refresh the record in EB Docket No. 04-296 regarding a certain Petition filed by the Minority Media and Telecommunications Council ("MMTC"). *Comment Requested to Refresh the Record in EB Docket No. 04-296, on Petition Filed by The Minority Media and Telecommunications Council Proposing Changes to Emergency Alert System (EAS) Rules to Support Multilingual EAS and Emergency Information*, EB Docket No. 04-296, Public Notice, DA 14-336 (rel. Mar. 11, 2014 PSHSB) ("*Multilingual EAS PN*").

[2] Comments of AT&T Inc., EB Docket No. 04-296 (filed Dec. 3, 2007); Reply Comments of AT&T Inc., EB Docket No. 04-296 (filed Dec. 17, 2007); Comments of AT&T Inc., EB Docket No. 04-296 (filed July 20, 2011).

[3] *Review of the Emergency Alert System*, Second Report and Order, 22 FCC Rcd 13275 at ¶ 45 and nn. 150-152 (2007) ("*Wireline EAS Order*"); *Erratum*, 22 FCC Rcd 17023 (2007). For example, in the *Wireline EAS Order*, the Commission acknowledged that AT&T had shown in its previous filings in this docket that there were technical obstacles to implementing EAS in an IP-based video distribution system, such as AT&T's U-verse, that were not confronted by providers using traditional cable, QAM-based video distribution architectures. *Id.*

accommodate those technical differences, such as by appropriately tailoring requirements based on the network architecture and technology deployed by communications providers and/or by setting deadlines for implementing any such requirements that appropriately account for the time necessary to overcome the technical challenges and system changes needed for each such system to comply.

- The originators of EAS messages should be responsible for creating any and all EAS message content; under no circumstances should communications service providers participating in the EAS (e.g., broadcasters, cable operators, and wireline video providers like AT&T) be required to create any EAS message content – including by translating EAS messages into other languages.

- The Commission should establish uniform procedures for adoption and implementation of regional (i.e., state and/or local) emergency alert requirements that build on the existing requirement that states must obtain Commission approval of state EAS plans. Consequently, the Commission should require all state and local government officials to incorporate any regional (i.e., state and local) emergency alert requirements – including requirements relating to local alert and override systems currently included in some franchise agreements – in the relevant state EAS plan, which should be submitted to the FCC for approval after notice and comment by interested parties. Such plans should clearly identify the types of messages that must be disseminated, the officials authorized to initiate such alerts, and the areas in which such alerts must be transmitted.

Regarding current multilingual EAS transmittal capabilities, AT&T U-verse can receive and process English and Spanish EAS messages from either an over-the-air ("OTA") LP-1/LP-2/NOAA station or from the FEMA IPAWS-OPEN EAS/CAP system. AT&T receives EAS alerts OTA from an LP station via cut antennas installed on each Video Hub Office ("VHO", one per DMA in which AT&T provides U-verse service) that are tuned to the specific LP station's frequency, which antennas then pass the signal to Encoder/Decoders ("EnDecs"). The EnDecs in the VHO process both English and Spanish (if Spanish is present) messages and pass the alerts to the U-verse TV platform for processing and distribution to the set top boxes ("STBs"). The STBs will display the EAS alert based on the "On Screen Language" and "Audio Language" that the user has selected. Thus, if the "On Screen Language" and the "Audio Language" are currently set to Spanish on the STB, all EAS alerts will be displayed in Spanish, if the EAS alert

was transmitted in Spanish. If the EAS alert was not transmitted in Spanish by the LP station, the EAS alert will be displayed in English regardless of the language selected.

A similar process occurs for all messages received via the FEMA IPAWS-OPEN EAS/CAP system. One difference is that there is an EAS/CAP receiver in each VHO that is polling the FEMA IPAWS-OPEN EAS/CAP system at 30-second intervals for any available EAS/CAP messages. If a message is present, the EAS/CAP receiver will pull the message from the appropriate FEMA server(s) and pass the message to the EnDecs in the VHO. The same process as described above is then followed to process and distribute the EAS/CAP message.

For EAN (Presidential) messages, AT&T U-verse force-tunes the STB to the designated emergency broadcast station in the local market. The audio on the designated station is passed-through from the broadcaster to the STB. Thus, if the designated station is transmitting the signal with English as the Primary Audio, and Spanish on the Secondary Audio Programming ("SAP") channel, the audio on the STB will be played based on the user settings described previously.

A challenge transmitting *non-CAP* EAS alerts could occur, however, if AT&T U-verse were to receive multiple language alert messages from different LP stations for the same event. In such a scenario, there could be duplicate conflicts, which might result in the duplicate alerts being discarded. Even if the multiple language alerts were properly identified as being unique alert messages, there would then be delays in the processing and delivery of the separate messages to the STB clients. This is because each incoming message is queued until any

previously received messages are delivered in their entirety. This would also cause the sequential interruption of programming to all STB clients for each language version of the same event.[4]

In sum, with the caveat just explained, AT&T currently has the capabilities to receive, process, and distribute both English and Spanish EAS and EAS/CAP messages, *so long as* the message is transmitted in both English and Spanish using the existing LP-1/LP-2/NOAA stations and the existing FEMA IPAWS-OPEN EAS/CAP system.

However, if the Commission were to adopt MMTC's proposal to add a separate "Local Primary Spanish" ("LP-S") station in a given market,[5] AT&T U-verse would need to evaluate any architecture changes required to support changes to the OTA delivery of EAS messages and the FEMA IPAWS-OPEN EAS/CAP system. At a minimum, AT&T would have to purchase and install the requisite antenna to receive the new frequency along with a new EnDec to process the Spanish messages from the new station. Depending on the number of markets in which a new LP-S station were added, the time and expense associated with all the foregoing efforts could become substantial.

AT&T U-verse would encounter similar obstacles if the Commission were to adopt MMTC's proposal to add a separate "Local Primary Multilingual" ("LP-M") station in a given market that broadcasts alerts in a language other than English or Spanish.[6] AT&T's U-verse EnDec vendor would need to develop software to support any additional languages; and AT&T then would need to test, purchase, and deploy the additional software/license(s), antennas, and

[4] These particular issues would not arise with CAP-delivered multi-language messages, because CAP is inherently designed to handle multiple languages.

[5] *See, e.g.*, *Multilingual EAS PN* at 2-3.

[6] *See, e.g.*, *Multilingual EAS PN* at 2-3.

EnDecs required to receive and process languages beyond English and Spanish. Furthermore, AT&T would more likely than not need to develop a new IPTV STB capability to process any languages beyond English and Spanish. All of these efforts would entail substantial time and expense.

To conclude, today AT&T U-verse can receive and process English and Spanish EAS messages from either an existing OTA LP-1/LP-2/NOAA station or from the FEMA IPAWS-OPEN EAS/CAP system. If the Commission were to designate additional LP-S and/or LP-M stations, however, the full scope of changes required to implement additional language capabilities on AT&T's U-verse IPTV platform and architecture would need to be evaluated. It is reasonable to assume that significant time and expense would be involved in developing the necessary capabilities to receive, process, and transmit EAS messages from any such additional stations.

Respectfully submitted,

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