

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

Reply Comments in the matter of )  
Review of the Emergency Alert System ) EB Docket No. 04-296

Reply Comments on Behalf of Federal  
Emergency Management Agency  
Integrated Public Alert and Warning  
System Program Management Office

August 14, 2014

**Re: NOTICE OF PROPOSED RULEMAKING**

**I. INTRODUCTION**

The Integrated Public Alert and Warning System (IPAWS) is the nation's next-generation infrastructure of alert and warning networks expanding upon the traditional audio-only radio and television Emergency Alert System (EAS) by providing one message over more media to more people before, during, and after a disaster.

Since 2004, FEMA has served as the Federal Executive Branch lead agency for developing IPAWS. In June 2006, the President signed the Public Alert and Warning System Executive Order 13407 to drive the creation of a more "effective, reliable, integrated, flexible, and comprehensive system that enables the American people to receive alert and warning information through as many means as possible." In response, FEMA established the IPAWS Program Management Office (PMO) in April 2007.

The IPAWS vision is to build and maintain an effective, reliable, integrated, flexible and comprehensive system that enables the American people to receive alert and warning information through as many means as possible. IPAWS ensures the President can alert and warn the American people under all conditions. IPAWS provides Federal, State, Territorial, Tribal, and local warning authorities with capabilities to alert and warn their respective communities of all hazards impacting public safety and well-being via multiple communications pathways.

The FEMA has, and continues to, work closely with the FCC Public Safety and Homeland Security Bureau (PSHSB), the National Weather Service (NWS), other government agencies and organizations and representatives of private industry on matters concerning the EAS and

other methods and systems capable of delivering alert and warning information to the American people. FEMA fully supports the FCC in their effort to strengthen the national level EAS through development of a defined national test program. Testing of public alert and warning systems is vital to the fulfillment of the President's directive on National Preparedness (PPD-8) and to support National Preparedness Goal published by DHS FEMA in September 2011.

## II. COMMENTS

The FEMA Integrated Public Alert and Warning (IPAWS) Program Management Office offers the following comments.

- In previous comments FEMA has stated its support for the establishment of a "six zeros" location code to allow an EAS message to be geo-targeted to the entire United States including US territories.
- The Commission should include in their consideration such costs as the loss of revenue due to multiple program interruptions and losses associated with message delivery delays that potentially place the public at risk.
- Regarding the use of the National Periodic Test (NPT) Event Code for national testing, FEMA has long supported establishment of uniform standards of behavior for EAS devices upon receipt of an NPT message. FEMA prefers that EAS Participants be obligated to immediately forward any NPT EAS test message that contain a valid national level Originator (ORG) Code that is properly geo-coded to an EAS Participant's Operational Area in accordance with an approved State EAS Plan. FEMA urges the Commission to consider not only the costs to industry necessary to implement the NPT code, but to also consider the costs associated with the public education campaign requirements in advance of national EAS tests that incorporate the Emergency Action Notification (EAN) event code. Such testing often referred to as "live" code testing requires EAS Participants to manually insert a graphic indication that "This is a Test." While such "live" code testing may be necessary on a regular basis, bi-annual "live" code tests, as recommended by the CSRIC IV EAS Test Working Group, would result in a significant financial burden to the industry.
- FEMA supports the proposed updates to the EAS Test Reporting System.

Respectfully submitted,



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