

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

Review of the Emergency Alert System)
) EB Docket No. 04-296
)

COMMENTS OF AT&T¹

I. Introduction

AT&T fully supports the Commission’s goals of ensuring that the Emergency Alert System (EAS) is an effective component of a network that provides the public with timely and accurate emergency alerts over as many communications platforms as possible. AT&T appreciates the opportunity to participate in the Commission’s efforts to achieve those goals. These comments regarding some issues raised in the *2014 EAS NPRM* are one aspect of such participation.

II. Discussion

AT&T supports the Commission’s proposal that EAS participants be required to have the capability to receive and process a national location code of “six zeroes.”² AT&T also supports the Commission’s proposal to create an option to use the National Periodic Test (NPT) code for EAS testing.³ AT&T’s support is premised on the Commission also adopting a requirement that the NPT be activated like any other EAS alert, rather than that the NPT fully emulate the EAN in

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 *In the Matter of Review of the Emergency Alert System*, EB Docket No. 04-296, Notice of Proposed Rulemaking, FCC 14-93 (rel. June 26, 2014) (“*2014 EAS NPRM*”).

² See, e.g., *2014 EAS NPRM* at ¶ 14.

³ See, e.g., *2014 EAS NPRM* at ¶ 19.

all its characteristics.⁴ Requiring the latter (i.e., full emulation of the EAN) would impose undue costs on EAS Participants and take an inordinate amount of time to implement, especially given FEMA's desire to conduct another EAS test in the near future. By contrast, requiring the former (i.e., activation like any other EAS alert) would involve an appropriate cost level for EAS participants, and provide a basis for obtaining robust test data concerning performance of the EAS.⁵ Moreover, the former approach could be implemented relatively quickly, though not likely within the six month period that the Commission appears to contemplate.⁶ Instead, AT&T believes that the activities necessary to permit use of the NPT code for EAS testing would require at least twelve (12) months to complete.

In sum, given the existence of an alternative path forward that would achieve most of the Commission's objectives, the associated costs and timeframe required for implementation of a full EAN emulation cannot be justified at this time compared to the potential benefit that may be derived. Rather, the Commission should adopt a requirement that the NPT be activated like any other EAS alert.

In addition, AT&T generally supports the Commission's proposal to require every EAS Participant to submit nationwide EAS test result data electronically via the EAS Test Reporting System (ETRS) for any future national EAS tests.⁷ AT&T has at least one concern, however. Specifically, the "Participant Information" portion of Form One -- as it appears in Appendix D, Figure 2 to the *2014 EAS NPRM* -- does not accurately reflect the status of different EAS

⁴ See, e.g., *2014 EAS NPRM* at ¶¶ 20-21.

⁵ See, e.g., *2014 EAS NPRM* at ¶¶ 20-21.

⁶ See, e.g., *2014 EAS NPRM* at ¶ 41.

⁷ See, e.g., *2014 EAS NPRM* at ¶¶ 24-29.

Participants.⁸ It allows an EAS Participant to identify itself only as either a “Broadcaster” or a “Cable Operator”, when in fact EAS Participants are not limited to these two kinds of entities.⁹ To account for this, AT&T suggests that the Commission add a third EAS Participant Type field entitled “Other”. At a minimum, if changing Figure 2 Form One to accommodate this third category proves problematic, the Commission should ensure that the electronic filing system allows a filing entity to proceed with providing the requisite EAS test information even if neither the “broadcaster” nor “cable operator” choice is selected as depicted in Figure 2.

III. Conclusion

AT&T applauds the Commission for helping to pave the way for further EAS testing in order to maximize the utility of emergency alerts. Adoption of the actions described herein would assist the Commission in achieving that important goal.

Respectfully submitted,

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⁸ 2014 EAS NPRM at Appendix D, Figure 2.

⁹ See, e.g., 47 C.F.R. §§ 11.2(d), 11.11.