

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

COMMENTS OF VERIZON¹

Verizon supports the Commission’s efforts to strengthen the Emergency Alert System (EAS) by addressing certain issues that arose during the nationwide EAS test on November 9, 2011.² In these initial comments, Verizon offers support for, and recommendations to improve on, the Commission’s proposals for the electronic EAS Test Reporting System (ETRS) and the visual text crawl of EAS alerts.

EAS Test Reporting System. Verizon supports the Commission’s proposal to make reporting through the electronic ETRS mandatory for all participants in future nationwide tests. *See NPRM*, ¶ 25. Electronic filing of reports will facilitate EAS participants’ delivery of test results to the Commission and review of those test results. However, Verizon does recommend one modification to the current versions of the reporting pages, specifically Form One.

Form One currently assumes that each PSID (Physical System ID) is equivalent to a single geographic area in which a cable operator delivers emergency alerts. In Verizon’s FiOS video distribution network, a PSID is assigned to each Video Hub Office (VHO), which may span several communities and may be associated with different sets of equipment for monitoring

¹ The Verizon companies (Verizon) participating in this filing include the regulated, wholly-owned affiliates of Verizon Communications Inc.

² *Review of the Emergency Alert System*, Notice of Proposed Rulemaking, EB Docket No. 04-296, FCC 14-93 (June 26, 2014) (*NPRM*).

and distribution of EAS alerts. Pursuant to the applicable state and local EAS plans, the EAS equipment within each of these “EAS Zones” monitors a different set of broadcast stations, and, when an alert is activated, the equipment transmits the alert message to customers in the appropriate EAS Zone. A single FiOS VHO (or PSID) may be comprised of multiple EAS Zones. The number of EAS Zones varies from VHO to VHO, depending how the FiOS network is situated with respect to the EAS geographic boundaries established by the applicable state or local EAS plan.

Given this network architecture, the current version of Form One hindered Verizon’s delivery of its test results for the first nationwide test. ETRS would only accept one report for each PSID. When Verizon attempted to enter multiple reports for each EAS Zone within a single PSID, ETRS would only accept the last entry, over-writing the previous entries. Ultimately, Verizon had to submit reports manually to the Commission for each EAS Zone within all PSIDs. Obviously, this limitation on ETRS defeats the benefits of electronic filing.

There may be multiple, readily-achievable solutions for this issue in ETRS. For example, the Commission could add an optional sub-PSID field on Form One to allow the system to accept multiple reports with the same PSID. In this case, the sub-field should provide flexibility for the provider to submit either one or multiple reports, depending on the number of EAS Zones that overlap or touch a PSID. Whatever solution is implemented, Verizon supports the Commission’s proposal to require electronic filing of test results with the modification proposed above. ETRS should accommodate the variety of configurations of cable and video programming distribution networks available to consumers.

Verizon also supports the Commission’s proposal to give ETRS filers the capability to review filings prior to final submission and to retrieve previous filings to correct errors. *See*

NPRM, ¶ 27. These proposals will facilitate entry of better and more accurate information to ETRS, and, thereby, will benefit the EAS system as whole.

EAS Visual Text Crawl. As an EAS participant, Verizon is committed to ensuring that our EAS delivery system supports the needs of all our customers in an emergency, including members of the deaf and hard-of-hearing community. Accordingly, given the difficulties encountered with the text crawl in the nationwide test, *see NPRM*, ¶ 32, Verizon appreciates the need to improve the quality of the text crawl and thereby the accessibility of EAS alerts.

As explained in the *NPRM*, the Commission’s recently adopted quality standards and best practices for closed captioning of television programming provide a useful model for display of the EAS message text crawl. Verizon supports use of these best practices in the Commission’s proposed additions to Section 11.51(d) of the EAS rules concerning the display of the text crawl accompanying the alert message for speed, completeness and placement. *See NPRM*, ¶¶ 36-38.

The Commission should, however, clarify proposed Section 11.51(d)(3), which currently states that the text crawl must be displayed “[c]ontinuously throughout the duration of any EAS activation.” This requirement would be more accurate if the language read “[c]ontinuously throughout the duration of any EAS message.” The text crawl is associated with the audio version of the EAS message, not the general EAS activation. Depending upon the type of alert, an EAS message may not be delivered immediately upon “activation” of the EAS system. *See, e.g.*, 47 C.F.R. § 11.51(m). Given this potential, there could be confusion in implementing this requirement unless EAS participants ensure that the text crawl runs continuously in conjunction with the EAS audio message.

Also, with respect to placement, as the Commission notes in the *NPRM*, ¶ 38, there are already requirements in the EAS rules for display of the text crawl “at the top of the television

screen or where it will not interfere with other visual messages.” *See, e.g.*, 47 C.F.R. §§ 11.51(d), (g)(3), (h)(3). The Commission’s proposed language, “at the top of the television screen or where it will not interfere with other visual messages or otherwise block other important visual content on the screen,”³ is more comprehensive and precise. The top of the television screen may not always be the segment of the screen best suited to display the text crawl. The important issue for the text crawl is not always the position, but that the text crawl is displayed clearly at the same time as the EAS audio message. The Commission should modify the other Part 11 rules to be consistent with this new language on display of the text crawl.

Accordingly, Verizon recommends that the Commission adopt the proposals in the *NPRM* to use the ETRS and to improve the accessibility of the EAS message text crawl with the modifications recommended above.

Respectfully submitted,

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³ *NPRM*, App. B, § 11.51(d)(1).