



2 September 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: EB Docket No. 04-296

Reply Comments of Monroe Electronics, Inc.

Monroe Electronics provides the following reply comments in regards to the Commission's Notice of Proposed Rulemaking (NPRM) on the Emergency Alert System (EAS).

1 Regarding Visual and Audio Accessibility of Alerts

In response to the comments of the Wireless RERC and others, we suggest that a collaborative process across industry and the government would be the most effective path to creation of meaningful and practical approaches and best practices for EAS display, including crawl speed, font, size, color and other "look and feel" elements. EAS displays often involve character generators (CGs) and media keyers that are provided by manufacturers that are otherwise not directly involved in EAS matters. The input of these manufacturers is essential to properly define the feasibility and cost of any potential modifications to these video systems.

We also note that most existing venues for industry-government collaboration (such as the FCC's CSRIC) do not presently include the requisite cross-section of stakeholders, which would include at a minimum EAS Participants, EAS manufacturers, graphical display manufacturers, representatives from the accessibility community, and others.

Electrostatic Measurement
Emergency Alert Systems
CATV Switching and Control

585-765-2254 fax 585-765-9330
100 HouseI Ave. | Lyndonville | NY | 14098
www.monroe-electronics.com

We note – as a benchmark - the composition of a “Common Look and Feel” working group in Canada, which achieved some of the elements in accessible displays. At the same time, we note that this group did not include significant participation of graphical display and EAS manufacturers. As a result, there are concerns over the unanticipated cost and practicality of some CLF requirements. We use this example as a best practice of what can be done with private-public collaboration, and a caution of unintended consequences where a more representative range of stakeholders do not have full input.

2 Regarding Multilingual EAS Messaging

Monroe read with interest the comments of AAJC and others regarding multilingual alert message. Monroe refrains from substantive comment on this issue at this time, but does suggest that the Commission may wish to observe several advanced pilot projects currently under development relating to multilingual EAS messaging. These pilots may provide useful empirical information about the challenges, limitations, opportunities and possibilities for multilingual EAS messaging. We therefore suggest that the Commission may wish to defer any rulemaking on non-English alerts until additional study and pilots have been completed.

3 Regarding “Wildcards”

We wish to clarify with the Commission that Monroe’s EAS solutions do not – and have never - used “wildcards.” The FCC’s definition of wildcard is reasonable within the context it is made, wherein: “a ‘wildcard’ is a programming shortcut used in some EAS equipment whereby the encoder/decoder can be made to accept as valid any entry within a given header field, no matter what data it contains.” The FCC’s definition is not dissimilar to the definition of wildcard used in computing or telecommunications. In this regard, we disagree with an attempt by a commentor to redefine the FCC’s user of the term “wildcard.” Those comments however appear to relate to user interface functions, which is be wholly separate of the FCC-regulated issue of EAS headers.

Regarding EAS headers, Monroe’s EAS equipment does NOT “accept as valid any entry within a given header field, no matter what data it contains,” nor is any header element be substituted for any other data. We reiterated that Monroe EAS equipment processes all EAS headers. In a previous filing, Monroe provided the Commission with the example of the location parameter, where “the PSSCCC (location) parameter must be present, though in the case of the EAN, can include any FIPS geocode.” To be specific, in the case of the EAN location code, for example, the *received* EAS header (1) must contain a location PSSCCC value, (2) that location value must be valid, and (3) that valid location value is whatever the alert originator (FEMA) transmits, again so long as it is a valid FIPS code (or national 000000 code). The user of Monroe EAS systems can **not** alter that location value, nor any other parameter in the EAS header.

An example of wildcard processes with EAS headers is the altering or substitution of data in the EAS header with other information. For example, with an EAN, a location code relating

to “Washington DC” may be included in the EAS headers as sent from the originator. However, we observed that some EAS devices may ignore that location code value in this context, and substitute the value of “United States” or some other data instead of the value specifically identified in the EAS header.

Monroe Electronics disagrees with this practice, as it is not provided for in Section 11.31 of the Commission’s rules, and would appear to be an amendment or abridgment of the output of the EAS header codes. The processing of textual (and TTS) output of header is literal in Monroe EAS devices. When the EAN header includes a Wash DC location code, the textual (crawl) output is “*has been issued for the following location(s): Washington, DC*”. The user of Monroe EAS systems cannot change the value or textual output for the header location value, or other header values.

In our opinion, changing the textual or TTS output of a location code (or any other EAS header element), is clearly an example of a “wildcard,” and one we do not provide nor support, as this is clearly amending or abridging of the output of the EAS header codes.

4 Immediate Transmission of the EAN

While the Commission did not ask for comment regarding the immediate broadcast of an EAN, we provide the following clarification to SBE’s comments on the matter. Monroe informs the Commission that all its EAS products, running software version 2.6 or later, will retransmit the EAN immediately upon receipt by default, regardless of the Time of Release provided by the alert originator.

5 NPT Issues

In support of a planned September 2014 EAS test using the NPT code in West Virginia, Monroe Electronics has provided its users with simple guidance to automatically forward an NPT alert (<http://www.digitalalerts.com/pdf/APNDAS-140.pdf>). This application note illustrates the ease with which the NPT can be utilized in its current state, and can be automatically forwarded.

In regards to the SBE’s suggestion that the NPT should also be broadcast immediately upon receipt, Monroe notes that this capability could be added to a future software version its EAS systems. The Commission’s EAS rules do not currently specify that an NPT is to be treated in a like manner as the EAN. The Commission’s rules must be updated to specify such a requirement.

Monroe addressed NPT priority and message duration in its previous comments, but did not address immediacy. Further allowance must be made for the time and cost required for software development, fielding and installation to all EAS participants, the time for which we estimate to be not less than one year. We also respectfully suggest that the Commission bear in mind economic or opportunity costs if the NPT is to be “broadcast immediate” like the EAN, due to potential losses of advertising, programming or other revenues. For these

reasons, we concur with NCTA's comments that utilizing the NPT as configured today (but with the addition of the 000000 national location code, and making the code mandatory), is the most efficient and cost-effective way to proceed for national EAS tests in the near term.

However, Monroe cannot furnish definitive estimates on likely operational impacts on downstream systems in various broadcast, cable and MPVD operations for a "broadcast immediate" NPT or EAN, where those downstream systems may still be "time sensitive." These systems and issues are wholly outside the control of Monroe Electronics. The time for these systems to be updated to accommodate a modified NPT with a "broadcast immediate" requirement may be longer.

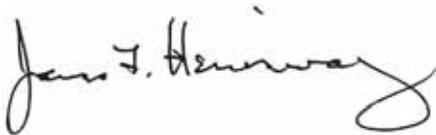
6 Regarding ETRS reporting

Monroe adds its support to allowing EAS Participants to file consolidated reports in the ETRS. Many of Monroe's customers in the broadcast and cable industry operate multiple systems. Allowing consolidated ETRS filing could significantly reduce the administrative burden on numerous EAS Participants, and facilitate timely reporting. For example, the existing ETRS structure would require some MSOs to file literally hundreds of individual reports, for each of the systems it operates. Allowing these EAS Participants to file for all of their operations in a single database or spreadsheet would clearly be more efficient for both government and industry. Monroe suggests such a consolidated filing capability would be of great use in advance of the next national EAS test.

7 Conclusion

For the foregoing reasons, Monroe asks the Commission to amend its EAS rules consistent with the above reply comments regarding "wildcards," NPT processing, accessibility, non-English alerts, and ETRS filing.

Respectfully submitted,



James F. Heminway
Chief Operating Officer



Edward Czarnecki
Senior Director – Strategic Development and
Global Public Sector