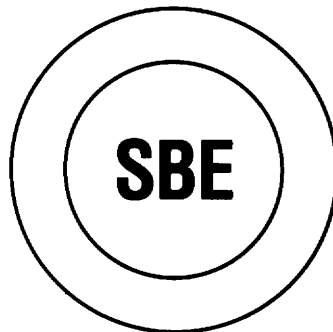


**Comments of the  
Society of Broadcast Engineers, Inc.**

**EB Docket 01-66  
Amendment of Part 11  
EAS Rules**



June 11, 2001

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**SOCIETY OF BROADCAST ENGINEERS, INC.**  
Indianapolis, Indiana

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

In the Matter of )  
 )  
Amendment of Part 11 of the Commissions ) EB docket 01-66  
Rules Regarding the Emergency )  
Alert System )  
 )  
 )

To: The Commission

**Comments of the Society of Broadcast Engineers, Inc.**

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby respectfully submits its comments in the above-captioned Notice of Proposed Rulemaking relating to The Emergency Alert System.

**I. EAS Testing**

1. The SBE had recommended to the Commission that the relay window for Regular Monthly Tests ("RMTs") be extended from 15 to 60 minutes. There are some that are concerned that this time increase will have the result of increasing what's termed the 'daisy-chain-delay'. This is a condition whereby the relay or retransmission delay accumulates with each relay. The result of this process could delay the receipt of a RMT by as much as 59 minutes with each relay. Others are concerned that the training aspect of this change will be diminished. SBE however continues to believe that because the RMT is indeed a 'test' and whereas the relay or retransmission requirements of emergency Action Notifications ("EANs") are not affected that this change is reasonable and certainly less disruptive. SBE commends the FCC for proposing to make this change.

**II. Modulation Level of EAS Codes**

2. Shortly after the adoption of Part 11 of the Rules, it became clear that the composition of the EAS tones generally prohibited achieving the prescribed 80% modulation requirement in the vast majority of broadcast installations due to the reaction of audio processing and modulation control equipment. SBE recommends that rather than stating a minimum modulation requirement of 50% that the Commission, in the amended rule, require that the

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modulation level of EAS codes be at the maximum possible modulation level but in no case be less than 50%. This change will bring into alignment the Commissions rules and practical technical limitations of the equipment involved.

### **III. Compatibility of EAS Equipment with NWS-SAME System**

3. The SBE feels that the National Weather Service ("NWS") request is valid and acknowledges that broadcasters may not wish to log the receipt of certain EAS messages that are intended as 'tests' of distribution systems or equipment at the origination point as opposed to the testing of operators at reception locations. One of the often-heard criticisms of EAS is 'over-testing.' As EAS systems become more complex due to new sources of warning messages and new codes, SBE feels there is a need to find the right balance between testing and the potential for a backlash when that increased number of sources originate their own tests. The responsibility for finding this balance should rest at the state emergency communications committee ("SECC") and local emergency communications committee ("LECC") levels.

4. The primary concern here is the issue of the requirement that all EAS decoders display and/or log the receipt of any EAS message received.

5. A secondary issue is related to the various manufacturers of EAS equipment. The design differences taken by these manufacturers differ significantly and any amendment of the display/logging requirement may result in some units being unable to easily handle this change in part or in *toto*. This should, however, not deter the Commission from making such a change if a tangible benefit accrues to the public, if the cost and operation burdens to broadcasters are not excessive, and if the manufacturers of existing notified equipment can produce modifications so the cost/benefit ratio makes sense. SBE notes that owners of these devices are always free to purchase a more "feature rich" decoder in the future. SBE awaits comments by the manufacturers of EAS equipment.

6. SBE agrees with NWS that the rules should be amended to the degree that the logging and/or display of certain specific EAS messages may become an option. It's important that the Commission limit this option to messages that are not designed to reach the general public, such as the designated monthly practice/demonstration ("DMO").

**IV. Change the RMT to RQT**

7. Whereas the RMT is the only required relay/retransmission test we have with EAS, any reduction in the frequency of these tests will only serve to reduce the effectiveness of one of the primary missions for them, the testing of personnel at the source of EAS messages and at the receiving end as well. SBE believes these tests must continue at their present level to give all participants the opportunity to learn from failed tests and to demonstrate that identified errors are not repeated.

8. In many areas of the country the responsibility of initiating RMTs rests with various governmental entities on a rotating basis. A reduction of the frequency of these tests would not be in the best interest of the system due to the resulting reduction in training that they afford.

9. The frequency of the RMT has not been shown to be a burden to either the source entities nor the Broadcast or Cable industry.

10. The SBE recommends to the Commission that the rules related to the RMT be retained without change.

**V. Making the Two-Tone Attention Signal Optional**

11. There are those that argue that the two-tone attention signal is a relic of the past and is a holdover from the days of the Emergency Broadcast System ("EBS"). SBE maintains that the two-tone attention signal is just that, an attention signal that has been in use for many years and one that is universally recognized as a sound preceding emergency information. Further, SBE has been informed that there are, still in use receivers and decoders that respond to this two-tone signal. Therefore, the SBE recommends that the Commissions rules retain provisions for this signal until such time as it can be demonstrated that its use is clearly not required.

**VI. Should the FCC Take Steps to Encourage Local Participation?**

12. Increasing local participation in the EAS is a slow and difficult process due to many factors, including funding, interest, and perceived value to broadcasters. While broadcasters in the aggregate donate thousands of hours to state and LECC efforts, the sad fact is that some employers now require broadcast engineers to volunteer on their own time and at their own expense. SBE believes the principal reason for the reluctance of local governments to

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install origination equipment and/or use EAS is the simple fact that the current value of the system is diminished because of the voluntary nature of the system. Local governments would be far more interested in using EAS if they were assured that during emergencies messages would indeed be broadcast. If local governments were assured that their potentially life saving messages would indeed get through, they would be more likely to secure the funding necessary for participation.

13. The present EAS rules do not require the re-transmission or broadcast of any EAS message that can be used by state or local governments, or the National Oceanic and Atmospheric Administration ("NOAA"); therefore, EAS is not viewed as a reliable or useful tool in many parts of the country. If EAS is to become a viable means of reaching the residents of a state, city or other local area, the relaying or broadcasting of life saving information must cease to be voluntary, or the FCC needs to scrape EAS and invent a totally new emergency communications system. Until such time as the transmission of such EAS messages, such as TOR (Tornado Warning) or EVI (Evacuation Immediate) are mandatory, the potential of EAS to save lives will never be fully realized.

### **VII. Protocol for Text Transmission**

14. EAS messages consist of two parts, first the 'canned' or pre-programmed information within each decoder that is triggered by the EAS coding from the source that contains the Originator, Event Code, Location Code, *etc.* The second portion affords the EAS message generator the ability to provide very specific information by using a voice message.

15. The problem with this two-part system is that information is contained in the voice portion of the EAS message is not contained in the EAS coding and therefore specifics often do not reach recipients who may rely on the 'crawl' on a TV screen for their information. Another problem is that the TV crawl may be repeated several times while the voice message is only transmitted once.

16. In order to correct this problem it has been suggested that a means be provided for transmitting the details of the voice message in data form that would enable TV crawls and other recipients to have a text message with greater detail of the event.

17. SBE agrees that such a change would result in a considerable improvement in EAS and could lead to a greater level of participation. SBE continues to feel strongly that the need for this change exists.

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18. SBE would like to call the Commission's attention to other existing systems that are presently fulfilling the need for the distribution of additional data from local governments to the electronic media. These systems (EDIS in California and a similar system in Washington state) have proved to be effective and beneficial and should serve as examples to the Commission as it considers adding additional data transmission capabilities to EAS.

19. It is important to realize that for the "voluntary" part of EAS to be effective that the broadcast station-to-broadcast station relaying of information is simply not workable. Beyond the relaying of EANs and RMTs broadcast stations make poor vehicles for the distribution of other, more often utilized, EAS messages. Many states have developed systems for the purpose of distributing EAS messages from state and local governments to the electronic media. In some cases these systems utilize existing government and private radio channels, commonly referred to as "back ground channels." What is critical for EAS to evolve is the need for specific spectrum that can be set aside for the purpose of the distribution of EAS messages in their present form and most certainly those in the future that may involve greater amounts of data information. SBE urges the Commission to consider the spectral needs of EAS as it considers making these proposed changes. Should the Commission augment EAS with additional data transmission capability, it should also make available several narrow band channels in the government land mobile and BAS Remote Pickup ("RPU") bands available for the background relaying of EAS traffic.

20. The Commission's alternative suggestion, at page 9, paragraph 26 of the Notice of Proposed Rulemaking ("NPRM"), underscores the need for additional study of any such enhancement with the goal of creating a widely supported technical standard. SBE supports this view.

21. SBE therefore, urges the Commission to not delay the other issues that are included in this NPRM, but rather create a process whereby alternatives for adding additional text transmission capability can be tested and evaluated with the goal of bringing forth a system that will provide this type of enhancement to EAS in the shortest possible time.

### **VIII. Co-Owned Station Issues**

22. In the case of the generation of an RMT or other 'real' EAS messages, it is imperative that the originator of such messages be a singular source that will encode the messages with the same time-stamp. In some cases broadcast stations have been called upon to originate an RMT or other EAS messages and in other and more rare cases those stations are

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'cluster-operations' containing both the LP-1 and LP-2, where a single EAS encoder/decoder is shared by both stations. When these stations are called upon to originate an EAS message or test timing issues can be a problem.

23. SBE believes that broadcast stations should not be originating EAS messages. EAS messages should be originated by government entities in all cases. However, in cases whereby broadcast stations are called upon to perform this task, its imperative that only ONE message or test should be originated and in the case of the co-located LP-1 and LP-2 these messages be originated at the same time. SBE believes that this requirement will not create an unnecessary burden to those stations involved.

24. SBE urges the Commission to amend its rules in such a manner that it will ensure that RMTs or other EAS messages initiated by any single entity will contain the same time of origination.

### **IX. Carriage of Audio of Presidential Messages from Non-EAS Sources**

25. SBE believes that the highest priority of EAS is the carriage of an address to the nation from the President or other applicable official. We further believe that the next highest priority should be the transmission of this message using the highest quality audio available. In some cases, the audio delivered to a TV or Cable system may be 'out of time' with their video feed, thereby creating a confusing lip-sync problem.

26. In many cases the network of distribution systems used by EAS are not going to deliver the best possible audio to the broadcast station or cable system who is called upon it to deliver the message to the public. Such an address will normally be carried by any number of national radio and/or television networks using superior sounding wide band audio distribution systems.

27. SBE believes that in cases where there are live operators at these facilities they should be given the option to provide the 'best sounding' and 'best synchronized' audio to their listeners/viewers.

28. SBE urges the Commission to amend the rules so as to permit the carriage of EAS message audio from alternative sources, provided:

- A. The audio from the alternative source is indeed of better quality
- B. The audio is neither delayed nor advanced so as to avoid lip-sync problems.

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### **X. Modifications to EAS equipment to Incorporate Event Code Changes**

29. One of the advantages of EAS is that broadcast station EAS units can be used anywhere in the country. With today's broadcast ownership configurations an owner can order a unit and ship it anywhere within the company confident that this device will function with the local EAS plan. This is a situation that must not change.

30. SBE commends the FCC for seeking means whereby the process of upgrading EAS equipment can be reduced; however, it is very concerned that the standardization that we depend on today to make EAS effective may be compromised. EAS planners need to know that the changes and/or improvements to the EAS system will always be compatible with the equipment in use.

31. It is assumed by most EAS planners that the EAS system will change over time. One area certain to change is the list of Event Codes. The assurance that is required is that ALL of the installed devices will respond equally by a certain date after a change is agreed to at the national level. Any lessening of this requirement will compromise EAS and lead to far more difficult issues. Therefore SBE urges the FCC to reject any action that will compromise the interoperability of EAS equipment.

### **XI. Naming Convention Change**

32. The change in the naming convention as proposed by NWS may be useful to NWS, however, it does nothing to improve the EAS. Changing existing Event Codes so that the third letter of the code is standardized as to meaning would be meaningless to the general public. The EAS decoders 'decode' these three-letter Event Codes and transform them into warning or other information statements within the unit. It is only the decoded statement that is presented to the public, therefore this change would be strictly internal to the encoders and decoders and would not result in any improvement. SBE feels that the FCC should reject this proposal as being unneeded and unnecessary.

### **XII. Proposed Location Codes for Marine Areas**

33. SBE supports the NWS proposal to add inland waterways, sufficiently sized lakes, and seacoasts to the list of location codes. However, SBE differs on the methodology when considering the complexities needed to integrate the location or FIPS codes already defined in the NWS operating manuals to EAS equipment and operations at the local level. SBE also

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differs in its opinion on the delineation of proper territorial assignment within those areas for the purpose of efficient implementation.

34. SBE believes the lake/ocean as a "state" concept is misguided. Since all watches and warnings are issued from, and are related to, land based reference points, the use of "water states" would unnecessarily complicate the process. Further, the proposed bodies of water defined are sufficiently large in area that a wide area advisory as proposed would yield responses from locations unaffected by an area wide alert. Thus, SBE feels near-shore seacoast and lake shore water areas should reference the nearest state or Weather Forecast Office ("WFO") and be reflected in each state's set of location codes. This will also permit local emergency managers to coordinate alerts and manage emergencies more effectively. At present, emergency managers reference one, two, or at most three, lists of counties in order to issue a regional or state alert. By defining the water bodies as pseudo states, officials will then be required to look up a fourth or even fifth area to include water states for a regional or statewide emergency. This procedure could require precious time when the speedy issuing of an alert is important.

35. In the case of the Great Lakes, the NWS proposes to create new "states" for each Great Lake and associated minor chain lakes. SBE disagrees with this proposal. We acknowledge NWS' extensive effort to define the forecast coverage areas and to list them in such a way that is easily recognizable on the location's own merit. However, the creation of new "states" would confuse the general and marine public and add an additional layer to the already crowded EAS operating system in several areas. The near-shore (shoreline to 5 Nautical Miles (NM) from shore) forecast and short fuse warning areas are already defined in the NWS Operations Manual<sup>1</sup> and assigned to various WFOs surrounding the lakes. SBE believes that the near-shore forecast areas as should be classified and added as "Water Counties" in the state to which the waters adjoin. Off shore water areas (those from 5 NM off shore to the adjoining state or federal boundary) should also be listed as water counties and assigned to the nearest state or to the state where the responsible WFO is located. See Table I.

36. The above arguments similarly apply for seacoasts. SBE believes that the near-shore seacoast (shoreline to 12 NM out) forecast areas should be similarly assigned to their respective adjoining land states, tracking the same practice of the Great Lakes water

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<sup>1</sup> See <http://wsom.nws.noaa.gov/manual/CHAPTERD/ND521098.HTML> and <http://www.nws.noaa.gov/om/marine.shtml>.

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counties proposal. The NWS proposal to create a single state covering very large water regions would similarly confuse the public and complicate EAS operations in those states which have those shores. This situation is particularly acute in the area between Jersey City, New Jersey, and Kennebunkport, Maine. These seven state seacoasts are covered by only three WFOs. SBE also believes that it would be in the systems' best interest to assign the far-shore (12 NM off coast to 40 NM off coast) water counties to the nearest state or to the state where the responsible WFO is located.

37. New York State is a prime example of this condition. With shorelines on two Great Lakes, the St. Lawrence Seaway, and the Atlantic Ocean, the New York State Emergency Management Office would need to compile and maintain five state location code lists. The Detroit and Cleveland WFOs each have two states at this time. Under the proposed NWS system, those offices would also have five states assigned to their warning areas. The Gaylord, Michigan, WFO has one state and zonal forecast areas in three of the Great Lakes. Under the NWS proposal, that forecast office would have four "states". and Chicago would have three "states."

38. SBE also believes some seacoast near-shore forecast areas to be overly large. On the Pacific West Coast, there are populated seacoast forecast areas in excess of 100 miles in length along California, Oregon, and Washington. There is often no continuity of weather in those forecast areas, and weather conditions can be vastly different at either end of a single forecast zone. This would cause confusion to the public when small geographic area seacoast warnings are issued.

39. The NWS also proposes specific "water state" location codes for the outer Pacific waters surrounding United States territorial islands. SBE believes water state location codes would be duplicative and confusing to the general and maritime public. We feel water county location codes referenced to the existing state would be more practical to implement and less confusing.

40. The use of additional states would add an already increasing burden on limited memory capacity available in both encoders and receivers. By adding more states, available memory for other applications is reduced even further as the look-up tables become longer. Additionally, millions of existing receivers would be made obsolete since the location tables in them would be outdated.

**XIII. Suggested Alternative Location Codes for Water Counties**

41. SBE feels that since the greatest number of water counties would be in Florida, California, and Alaska, and at most add approximately 30 water counties to each state, the available pool of county location numbers starting with XXY901 would be suitable for lake and open water county assignment. The immediate implementation of the 9ZZ convention would clearly delineate those as water counties adjacent to the respective adjacent states. The location codes will also neatly fit within the existing FIPS location code lists for each state. A 900 code would mean all water counties within that state.

42. SBE believes that a number of other locations are eligible and should be considered for the "near shore marine" classification. Those areas would include inland waters that are commercially navigable for barge or other commercial traffic as well as large recreation lakes and rivers. Those areas can and do pose equally hazardous conditions when severe weather or other hazardous conditions arise and mariners are forced to seek immediate safe harbor. Presently, there are no formal means to alert mariners of pending extraordinary weather or other hazards in those areas. SBE feels that large water bodies (those areas where the distance to the nearest shoreline in most directions is more than 5 NM) should be classified and added as a water county to the associated state. Table II lists example of lakes and large bodies of water which are candidates for water county classification. These locations would also be assigned location codes starting with XXY801, thus defining them as large areas of open water, but not a Great lake or sea area.

43. SBE also believes that certain inland rivers should be included as water counties. Major navigable rivers such as the Mississippi, Missouri, Ohio, Rio Grande, Red and Colorado are examples of major inland rivers that should be added, considering the level of recreational and commercial water craft navigating those waterways on a year-round basis. In the case of mountainous areas, flash flooding, dam breaching, and volcanic ash/pyroplastic flows directly follow river valleys and pose a danger to those who might be using the waters down valley from the hazard. Further, in the case of a tsunami or other major short term sea level change, the water level of rivers flowing into the impacted ocean will back-track the level of the affected seacoast up river, potentially severely impacting areas some distance from the seacoast that would not otherwise be warned or suitably prepared. Following the large water body location code convention, location codes starting with XXY801 could be used for navigable rivers and bay areas not already defined by the NWS near-shore zone system.

#### **XIV. Other Location Codes**

44. Locations codes in the XXY701-799 range could be used for larger cities, specific larger towns within large counties, or other specifically defined areas within a state. These location codes could be particularly useful for very large cities and cities that overlap two or more counties in total coverage. Cities like New York City (5 counties), Kansas City (two counties and states), Los Angeles (3 counties), and Miami (2 counties) would see particular benefit to these location codes. This location code convention could also apply to large national parks, forests, Native American reservations, and other significantly sized parcels which occupy all or portions of multiple counties.

45. In order to make standard the FIPS code between EAS and NWS operations, SBE recommends that NWS revise its listings to eliminate one letter of the water code and replace it with the "within the county" identifier. Present convention is as follows:

LXZ###. Lake X Zone ###.

Since the goal is to standardize all location codes under this convention, SBE believes that the proposed "Z" designation is duplicative and not necessary. Changing the Z digit to a numeric county subdivision number will permit seamless integration of the NWS location identifiers into the EAS format of the two letter state identifier, one digit intra-county location, and a three number location/county identifier.

#### **XV. Countrywide Designator Triggering All Receivers**

46. SBE agrees with NWS on the all-country code (000000) activating consumer receivers regardless of county programming. However, the receivers need not trigger based on simply having a county listed. The all-country code should trigger mandatory un-muting of the receiver regardless of location and counties programmed within the decoder. This would allow for portability of the receiver to any location within the service areas covered by Part 11 and still receive national level alerts with no programming changes to the unit.

#### **XVI. NWS Radio System Deployment**

47. SBE also agrees with NWS that their transmitter network is becoming sufficiently deployed and is capable of more effective utilization. One natural use could be an augmentation to the Presidential Entry Point ("PEP") network in areas which do not receive or monitor PEP stations. The infrastructure within the NWS presently exists to permit TCP/IP narrow band voice streaming or packet to voice transmission at all WFOs and their

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EAS/SAME encoders. Since the proposed NWS replacement voice coder is perceptual and will accurately pronounce most any word or location by nature of its basic programming, it would be a logical choice to incorporate the NWS weather radio system on a nationwide alert basis, even if some areas are more distant and outside the normal service area but receivable none the less. Use of the NWS transmitters would be defined by the states and included where possible in their local plans. The presidential message would be translated real time into text and then sent via the NWS' wide area network ("WAN") to the local forecast offices for deployment to the public.

48. Receivers for the NWS radio system are already monitored or actively used by over 50% of broadcast stations and cable systems. This is mostly because the receiver packages sold included the NWS radio as a standard component. A number of reasonably priced receivers are also available for those stations that chose to assemble their own receiver package. Thus equipment costs for adding NWS receivers would be minor.

### **XVII. NWS Codes for Transmitter Control**

49. SBE opposes the use of EAS codes for nominal machine and transmitter control of any kind. SBE is aware of commonly available and viable control systems at the commercial level that offer greater control and flexibility to the NWS than the proposed EAS event codes. SBE estimates that each NWS transmitter control system could cost less than \$2,000 if using these commercially available systems. A custom system using EAS event codes would be several times this cost due to the limited production run of such equipment. Repair and replacement would be even more expensive. Security for a dedicated control system would not be a concern since the control circuit would be of a closed nature and thus not exposed to any hacking or tampering by unauthorized persons. Further, the EAS as its was originally envisioned is for expedient dissemination of call to action and warning messages. Machine command and control falls outside of this scope and thus should not be added.

50. Additionally, the EAS event commands are created by rulemakings and are inherently inflexible to the changes often necessitated by hardware requirements. SBE feels that this inherent inflexibility limits NWS operational flexibility by limiting the operational codes into two or four codes and no more. As broadcasters have determined many times, additional functions are useful and even imperative at remote transmitter sites. For these reasons SBE proposes the elimination of these codes in Section XXII of these comments.

**XVIII. County Code Changes**

51. Presently any county within the country can be addressed by an EAS Location Code. Recently the NWS has approached EAS planners around the country to consider the sub-division of the counties in such a manner that the sub-division boundaries might coincide with their existing or proposed forecast zones.

52. The existing county sub-division naming convention calls for counties to be subdivided into nine subdivisions. Each subdivision could then be addressed using the first digit of the FIPS code. The Northwest corner of a county would have a FIPS/Location code beginning with the digit '0', and the Southeast corner would begin with the digit '9.'

53. The problem is that not every county can be easily divided by nine, nor is that always necessary or possible. In many cases county shapes and sizes preclude the use of nine subdivisions. There are instances where it would be more logical to use perhaps only two divisions. It is clear that initial planning for EAS did not fully anticipate this issue.

54. In order to permit an orderly and logical use of this feature of the EAS coding scheme, there are four changes that need to be made to the naming convention used in describing the various sub-divisions of the counties. That is, the word 'CENTRAL' must be removed from the naming convention in FOUR places. The naming convention would look as follows:

<b>Fips/Location Code</b> <b>FIRST DIGIT</b>	<b>Present Location Name</b>	<b>New Location Name</b>
<b>1</b>	<b>Northwest</b>	<b>Northwest</b>
<b>2</b>	<b>North Central</b>	<b>North</b>
<b>3</b>	<b>Northeast</b>	<b>Northeast</b>
<b>4</b>	<b>West Central</b>	<b>West</b>
<b>5</b>	<b>Central</b>	<b>Central</b>
<b>6</b>	<b>East Central</b>	<b>East</b>

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<b>7</b>	<b>Southwest</b>	<b>Southwest</b>
<b>8</b>	<b>South Central</b>	<b>South</b>
<b>9</b>	<b>Southeast</b>	<b>Southeast</b>

55. The SBE urges the Commission to require this change be made in the naming convention so that full implementation of this feature of EAS can be realized.

### **XIX Changing WXR to NWS**

56. This NWS proposal is very much like the proposal to change the third letter of certain event codes. This might have been a good idea at the time of the creation of EAS, however at this time such a change does nothing to benefit EAS or bring meaningful improvement to the system.

57. SBE reminds the Commission that WXR is an internal code that is decoded by the EAS decoder to mean that the source of the message is the NWS and that this code is simply an internal function of the decoder and is never received by the general public. SBE urges the Commission to reject this change as being unnecessary.

### **XX. Cancellation Code**

58. SBE understands the Commissions reluctance to approve such a change due to the impact the requirements of EAS decoders. It important to understand that SBE does not feel that a cancellation code is required for all Event Codes, but rather for specific codes where a clear advantage can be demonstrated.

59. Whereas present EAS events are issued with a fixed 'end time,' this makes it quite difficult for government entities to cancel an EAS message once it has been issued, even if the threat no longer exists. Its vital to be able to communicate to the public when a treat has ended. A cancellation code would enable governmental entities to better communicate with the public.

60. Some examples of the use of such a code would be:

- A. When a called for Evacuation (EVI) is no longer required
- B. When a phone outage (TOM) has been restored

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C. When Shelter in Place (SPW) is no longer required.

61. The cancellation code would become a new event code related to the initiation code. Example would be EVC to cancel and EVI, TOC for the TOM, *etc.*

62. It would appear that the addition of selected cancellation codes would not over-burden the EAS hardware in place and would provide emergency management and government entities with a valuable tool that would have the effect of enhancing the value of EAS. Therefore SBE encourages the Commission to adopt this change.

### **XXI. NWS Proposal to Use Additional Letter and Numbers in the CCC Block**

63. Any general or non-location specific use of unique or different EAS Codes presents equipment compatibility issues that need to be carefully studied prior to approval.

64. SBE remains firm in its belief that all EAS equipment remain the same in the area of EAS Code encoding and decoding ability. In order to incorporate this change, a considerable amount of changes would be required in every EAS unit in operation, thereby adding expense for which a rationale has not been put forth.

65. SBE is not convinced that an additional 1.4 million location and message combinations are required. SBE believes that best way to enhance EAS will come with the ability to deliver text messages. SBE again urges the Commission to commission a study of this enhancement, and to reject this change until such time as a clear demonstrated need can be shown.

### **XXII. Event Code Changes**

66. While SBE is in favor of enhancing the EAS by adding several new event codes, it is also convinced that a number of the proposed new event codes as well as some of the existing event codes are not needed.

67. SBE is concerned about the physical limitations of presently installed EAS encoders and decoders and feel that the total number of Event Codes should be kept to a minimum so as to not compromise the ability of the system. Therefore SBE is recommending that several existing or proposed event codes be eliminated. In particular, many of the statements or watches codes.

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68. SBE reminds the Commission that the EAS is intended to provide the general public with information about ‘short-fuse’ events and not events, for which considerable information has been made available to the general public by other means.

69. SBE recommends the following actions regarding existing and new event codes:

<b>EVENT CODE</b>	<b>EVENT CODE TEXT</b>	<b>SBE RECOMMENDATION</b>
ABD	Abducted child statement	<b>NEW- replaces MIS (missing child statement)</b>
ADR	Administrative Message	Retain
AVA	Avalanche Watch	Eliminate
AVW	Avalanche Warning	Retain
BZW	Blizzard Warning	Retain
CDA	Civil Danger Watch	Eliminate
CDW	Civil Danger Warning	Retain
CEM	Civil Emergency Message	Retain
CFA	Coastal Flood Watch	Eliminate
CFW	Coastal Flood Warning	Retain
DBW	Dam Break Warning	Retain
DMO	Practice/Demonstration	<b>Retain, change to Logging Optional</b>
DSA	Dust Storm Watch	Eliminate
DSW	Dust Storm Warning	Retain
EAN	Emergency Action Notification	Retain
EAT	Emergency Action Termination	Retain

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EQS	Earthquake Statement	<b>New - Required to reach public with post-earthquake information.</b>
EQA	Earthquake Watch	Eliminate (no prediction possible)
EQW	Earthquake Warning	Eliminate (no prediction possible)
EVI	Evacuation Immediate	<b>Change to a REQUIRED Transmit/Relay</b>
EVX	Evacuation Cancellation	<b>New - added cancelation code</b>
FFA	Fast Flood Watch	Retain
FFS	Flash Flood Statement	Eliminate
FFW	Flash Flood Warning	Retain
FLA	Flash Flood Watch	Eliminate
FLS	Flood Statement	Eliminate
FLW	Flood Warning	Retain
FRW	Fire Warning	Retain
HLS	Hurricane Statement	Eliminate
HMA	Hazardous Materials Watch	Retain
HMW	Hazardous Materials Warning	Retain
HUA	Hurricane Watch	Retain
HUW	Hurricane Warning	Retain
HWA	High Wind Watch	Eliminate
HWW	High Wind Warning	Retain
LAE	Local Area Emergency	Retain
LEW	Law Enforcement Warning	Retain

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MIS	Missing Child Statement	Eliminate (replaced by ABD code)
NHW	National Hazard Warning	Retain
NIC	National Information Center	Retain
NMN	Network Message Notification	Retain
NPM	Nuclear Power Plant Test Msg.	Retain
NPT	National Periodic Test	Eliminate
NPW	Nuclear Power Plant Warning	change to NPP to avoid conflict w/ NWS <sup>2</sup>
RHA	Radiological Hazard Watch	Retain
RHW	Radiological Hazard Warning	Retain
RMT	Required Monthly Test	Retain
RWT	Required Weekly Test	Retain
SCS	School Closing Statement	Retain
SMW	Special Marine Warning	Retain
SPS	Special Weather Statement	Eliminate
SPW	Shelter in Place	<b>New</b>
SPX	Cancel Shelter in Place	<b>New: added cancellation code</b>
SVA	Severe Thunderstorm Watch	Retain
SVR	Several Thunderstorm Warning	Retain
SVS	Severe Weather Statement	Eliminate
TOA	Tornado Watch	Retain
TOM	911 Telephone Outage	Retain

<sup>2</sup> The "NPW" code is currently used by the NWS for "Non Precipitation Warning."

**SBE Comments to EB Docket 01-66 (Amendment of Part 11, EAS)**

TOX	911 System Restored	<b>New: added cancellation code</b>
TOR	Tornado Warning	<b>Change to Required Transmit/Relay</b>
TRA	Tropical Storm Watch	Eliminate
TRW	Tropical Storm Warning	Retain
TSA	Tsunami Watch	Retain
TSW	Tsunami Warning	Retain
TXB	Transmitter Back Up On	Eliminate <sup>3</sup>
TXF	Transmitter Carrier Off	Eliminate <sup>3</sup>
TXO	Transmitter Carrier On	Eliminate <sup>3</sup>
TXP	Transmitter Primary On	Eliminate <sup>3</sup>
VAW	Volcanic Ash Warning	Retain
VOA	Volcano Watch	Retain
VOW	Volcano Warning	Retain
WSA	Winter Storm Watch	Eliminate
WSW	Winter Storm Warning	Retain

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<sup>3</sup> See Paragraphs 49 and 50 of the preceding SBE comments.

## SBE Comments to EB Docket 01-66 (Amendment of Part 11, EAS)

### XXIII. Summary

70. SBE believes that the changes proposed in these comments will provide an important updating of the Emergency Alert System. Adoption of the changes detailed in these comments will result in a more efficient, reliable, and robust EAS.

### List of Figures

71. The following figures or exhibits have been prepared as a part of these EB Docket 01-66 comments:

1. Table I: Partial listing of WFOs and their off shore state coverage
2. Table II: Sample list of inland lakes of sufficient size to warrant water county designation(s).

Society of Broadcast Engineers, Inc.

/s/ James (Andy) Butler, CPBE  
SBE President

/s/ Dane E. Ericksen, P.E., CSRTE  
Chairman, SBE FCC Liaison Committee

/s/ Clay Freinwald, CPBE  
Chairman, SBE EAS Committee

/s/ Christopher D. Imlay, Esq.  
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June 11, 2001

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**SBE Comments to EB Docket 01-66 (Amendment of Part 11, EAS)**

**Table I: Partial Listing of Weather Forecast Offices (WFOs) and Their Off Shore State Coverage**

Buffalo:	New York
Chicago:	Illinois and Indiana
Cleveland:	Ohio and Pennsylvania
Detroit:	Michigan
Duluth:	Minnesota and Wisconsin
Gaylord:	Michigan
Grand Rapids:	Michigan
Green Bay:	Wisconsin and Michigan
Milwaukee:	Wisconsin



**SBE Comments to EB Docket 01-66 (Amendment of Part 11, EAS)**

**Table II: Sample List of Inland Lakes of Sufficient Size to Warrant Water County Designation(s)**

Great Salt Lake, UT	4 water counties
Lake Champlain, NY/VT	2 water counties, north and south
Lake Mead, NV	
Lake Winnebago, WI	
Lake of the Ozarks, MO	
Puget Sound, WA	4 water counties

