

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

In the Matter of)	
)	
Amendment of Part 11 of the Commission's Rules)	PS Docket No. 15-94
Regarding the Emergency Alert System)	

**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ submits these comments on the above-captioned Notice of Proposed Rulemaking, in which the Commission proposes a mechanism to enhance the accessibility of Emergency Alert System (EAS) messages for persons who “do not speak English very well or at all.”² The Commission’s plan would require broadcasters to transmit alerts in the primary language of their station’s content using pre-translated, pre-loaded scripts of EAS messages. NAB shares the FCC’s goal to enhance the safety of non-English speakers and does not oppose the FCC’s general approach. However, the NPRM reads more like a Notice of Inquiry (NOI) as it provides only a bare construct of the FCC’s proposal, and leaves open many questions about how it would work in practice. NAB is concerned that implementing the proposal will be more complex and costly than the FCC suggests. to ensure that implementation is simple, economical, and flexible.

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System*, Notice of Proposed Rulemaking, PS Docket No. 15-94, FCC 24-23 (rel. Feb. 16, 2024) (NPRM or Notice), at ¶ 1.

Importantly, the FCC must first acknowledge that EAS is a government-imposed mandate that is unfunded, and thus imposes direct costs on stations required to implement and maintain the system. This is an important component because the FCC must therefore be cautious about imposing costs that are unjustified or unnecessary. To that end, whatever plan the FCC ultimately adopts should be able to be executed through a routine software update, rather than require broadcasters to purchase additional hardware or a new EAS device.

In addition, it would be unreasonable for the Commission to require broadcasters to transmit EAS alerts in languages other than the primary language currently broadcast by any given station. Transmitting alerts in languages beyond the one used by a station would be unnecessary and cause confusion, and thus should be voluntary and based on a broadcasters' understanding of the communities it serves. Moreover, the approach proposed in the Notice will be more complicated for radio and television stations whose primary language is English but multicast HD radio channels or video streams in a non-English language (or vice versa), respectively, because such stations typically have a single EAS device that transmits one EAS alert across all of their channels at a time. The Commission's proposals would likely require these stations to purchase multiple additional EAS devices to support the various multilingual multicasts. Such stations must have the flexibility to provide multilingual EAS alerts consistent with their circumstances, whether in a combined message under the FCC's proposed approach, or sequentially pursuant to the ECIG Implementation Guidelines, in which case the second message may air after the first alert ends as regular programming. Stations should also be able to pursue replacing their hardware EAS device with a more efficient software-defined solution to provide multilingual alerts on one station or multicast outlets.

NAB also highlights the trade-off between using pre-canned EAS scripts and the amount of useful information that can be included in an EAS alert. In some cases, pre-scripting an alert message may not have a meaningful impact on public response to an alert. We also submit that the FCC must provide more information about the display of ASL translations of EAS messages under its plan before any stakeholder can meaningfully comment. Finally, we encourage the FCC to provide broadcasters the same 30-month period to comply it provided to CMS Providers to implement a similar mandate for wireless emergency alerts, to allow stations time to budget for the expense of implementing the FCC's approach, combining it with another mandatory EAS change under consideration, and enlist technical assistance to download and test the necessary software update.

II. THE FCC'S PROPOSAL IS ANOTHER UNFUNDED EAS MANDATE

For over 60 years, broadcasters have served as the backbone of EAS and its predecessors. The ability of broadcasters to reach virtually all Americans enables local radio and television stations to play a critical role in the dissemination of EAS alerts, including weather alerts issued by the National Weather Service (NWS), AMBER Alerts,³ and state and local level warnings. The uniquely reliable architecture of broadcasting allows local stations to keep the public safe and informed during emergencies, especially when other communications platforms fail, such as during the deadly wildfires last year in Maui, Hawaii, when all cell sites were offline for four days in several areas where citizens were affected.⁴ Broadcasters are proud of this public service.

³ Broadcasters played a critical role in creating AMBER Alerts in 1996 and distributing alerts that have led to the recovery of more than 1,100 missing and abducted children. Statistics available at https://www.missingkids.org/content/dam/missingkids/pdfs/amber/2021_Annual_AMBER_Alerts_Report_Final.pdf (last visited March 20, 2024).

⁴ FCC, "Communications Status Report for Areas Impacted by Hawaii Wildfires," (Aug. 19, 2023), available at: <https://docs.fcc.gov/public/attachments/DOC-396155A1.pdf>.

That said, EAS is an unfunded government mandate. Many do not even realize that broadcasters shoulder the costs to purchase, maintain, and insure equipment, conduct tests, train staff, and other duties needed to ensure EAS functionality. The funds needed to implement every change to EAS conceived by the FCC come at the expense of other station initiatives, including providing important news and emergency updates, including recently enacted EAS rule changes that required participants to expend considerable financial and logistical resources.⁵ Unlike other subscription-based communications providers, broadcasters cannot simply pass through the costs of FCC rules changes on to subscribers. Moreover, the FCC is weighing two other potentially taxing changes to EAS. One would require the addition of a new EAS code for “Missing and Endangered Persons (MEP)”⁶ and the other would compel incident reporting of every EAS outage.⁷ Both would mean additional time, effort, and expense for stations throughout the country.

Put differently, the Commission should be wary of taking broadcasters’ EAS role for granted. An additional requirement here or there, along with the slew of other regulatory mandates aimed (often only) at broadcasters), collectively take a great toll. This proceeding is yet another example, and in some circumstances, if implemented carelessly, the proposal could do more harm than good.

⁵ *Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System*, Report and Order, 37 FCC Rcd 11844 (2022) (requiring EAS Participants to prioritize CAP-formatted messages).

⁶ *Wireless Emergency Alerts, Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System*, Notice of Proposed Rulemaking, PS Docket Nos. 15-91 and 15-94, (rel. Mar. 15, 2024).

⁷ *Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System, Wireless Emergency Alerts, Protecting the Nation’s Communications from Cybersecurity Threats*, Notice of Proposed Rulemaking, 37 FCC Rcd 12932 (2022).

For example, as we understand it, under the Notice, the FCC would pre-translate EAS alert messages for the various EAS event codes into the 13 most commonly spoken non-English languages in the U.S., as well as in English and ASL. These “template” scripts would be stored in EAS devices and the translated audio for each template would be provided as audio files or links to streaming audio. New template-specific event codes would be added to the EAS protocol for each type of alert that alert originators could choose to initiate,⁸ which would require EAS Participants to transmit the template alert script and audio in the primary language of their content.⁹

The Notice asserts that implementation should be possible through a software update in most straightforward situations,¹⁰ such as a broadcaster that airs programming on one station in one language. It is not clear, however, whether current EAS devices will have sufficient internal storage to house the templates thus requiring hardware upgrades or, at minimum, the installation of external hard drives. These are not trivial costs, especially for some small stations. Moreover, some stations may have EAS devices that cannot be armed for the FCC’s approach through a simple software update, and the NPRM is silent on how such stations would implement multilingual alerting. Forcing broadcasters, especially small

⁸ This part of the FCC’s proposal begs further questions. For example, if additional EAS event codes are added to trigger template multilingual alerts for every event, under what circumstances would an alert originator choose to initiate the existing code instead of the multilingual template code? Why add a series of template EAS codes instead of just replacing the existing event codes? What happens if a downstream station cannot process a template code transmitted by the station it monitors? Again, the proposal lacks the detail and forethought needed to allow stakeholders to provide meaningful comment, and clearly demands additional consideration in a Further NPRM before the FCC weighs its adoption in a Report and Order.

⁹ NPRM at ¶¶ 12-13.

¹⁰ *Id.* at ¶ 29 (seeking comment on potentially required changes EAS devices and systems to implement the FCC’s approach and the costs of any such changes).

radio stations, to purchase new EAS devices would be unjust and cost-prohibitive as new EAS equipment can cost several thousands of dollars or more.¹¹ According to NAB analysis of 2022 BIA Media Access Pro data, there are approximately 6,400 full power commercial radio stations with annual revenue estimates below \$100,000, 5,900 stations with annual revenue estimates below \$50,000, and 5,450 stations for which BIA has no estimate and presumably generate even lower revenue.¹² Note that these data are revenue, not profits, and do not reflect noncommercial and low power stations that may have greater financial obstacles to funding the FCC's proposal. Thus, it is critical that the FCC clarify its proposal to strictly limit implementation costs. Simply imposing another EAS update and directing stations that cannot afford to comply to apply for a hardship waiver that may (or may not) be granted will be insufficient. NAB implores the Commission to truly assess the benefits it aims to deliver with these real-world costs. So, here, where making alerts available in non-English languages could yield some public benefits,¹³ the Commission should also come to grips with whether it is best to impose additional requirements on the basis of a record devoid of any documented problems in this area. NAB asked a group of broadcast group engineers who collectively oversee thousands of radio and television stations about their experience. None reported ever receiving a complaint from an audience member unable to understand the critical details in an EAS message or a request to broadcast alerts in multiple languages. The NPRM does not provide any examples of viewers or listeners being endangered by an

¹¹ See, e.g., https://bswusa.com/search.php?search_query=eas.

¹² BIA Advisory Services, Media Access Pro (last visited Mar. 25, 2024).

¹³ NPRM at ¶¶ 33-35.

inability to understand an EAS message in English.¹⁴ Although the goal of the FCC's proposal is clear, the real-world impact remains uncertain and perhaps too speculative to justify the FCC's proposed overhaul of EAS without first drilling down a bit deeper to understand if and where a problem exists.

The Commission also must seriously evaluate whether this approach should apply to stations that broadcast only in English. EAS equipment manufacturers have a fixed cost to develop and implement the software upgrades to comply with regulatory changes and typically would spread this cost across its entire customer base. Although imposing the costs to create the required software update on only non-English stations might be unreasonable, some English-language stations are wary of budgeting for an FCC-mandated capability they will never deploy. The Commission should clarify the purpose and logic of its proposal in this in light of this factor.

III. THE FCC'S PROPOSAL MUST BE CLARIFIED TO ENSURE SIMPLICITY AND FLEXIBILITY

As discussed above, NAB expects that the FCC's plan will be fairly straightforward in the simplest cases, such as one station that broadcasts in one language. Relatedly, we strongly support the FCC's decision that EAS Participants must only transmit the template EAS alert that corresponds to the primary language of their content.¹⁵ Transmitting alerts in additional languages should be voluntary, based on a broadcast station's familiarity with the needs and interests of its local audience. As the FCC states, requiring only one EAS message

¹⁴ Even MMTC, which has pushed for multilingual alerting in dozens of filings and FCC meetings since 2005, has never cited any relevant anecdotes other than Hurricane Katrina, which was an unprecedented event that knocked nearly all the stations in the region off the air. Petition for Immediate Relief, Independent Spanish Broadcasters Association, the Office of Communication of the United Church of Christ, Inc., and the Minority Media and Telecommunications Council, EB Docket No. 04-296) (filed Sep. 20, 2005).

¹⁵ NPRM at ¶¶ 13, 18, 21, and 33.

will reduce potential programming disruptions,¹⁶ which is paramount during emergencies when broadcast reporters are providing much more detailed and locally tailored news and information than contained in an EAS alert. The FCC should not require stations to transmit EAS alerts in multiple languages, including when a station brokers a portion of its schedule to a foreign language programmer.¹⁷ Similarly, alert originators should not play a role in selecting which non-English template EAS alert(s) must be transmitted,¹⁸ as this would also disrupt a station's emergency news content and possibly delay an alert if a station had to fulfill an originator's instruction in the midst of an emergency.

Implementation of the FCC's proposal would be more complex for stations that broadcast multicast HD radio channels or video channels in a non-English language.¹⁹ Under the FCC's approach, such stations will be required to transmit the template EAS script and audio in the primary language of those channels. However, broadcasters typically have only one EAS device that can transmit a single EAS alert at a time across all such outlets. Again, consistent with the suggestion that the Notice is far more akin to an NOI than an NPRM, the Notice poses a series of questions that in effect place the burden on industry to figure out a solution.

Flexibility must be the FCC's watchword. Broadcasters should be allowed to choose a method to provide non-English EAS alerts that best suits their circumstances and

¹⁶ *Id.* at ¶ 19.

¹⁷ To our knowledge, it would be extremely challenging for a station to process EAS alerts in another language during only those hours of its daily or schedule when a third-party entity responsible for programming brokered time is broadcasting non-English programming.

¹⁸ *Id.* at ¶ 21. The ECIG Implementation Guide is available at <http://eas-cap.org/documents.html>.

¹⁹ See, e.g., KWPR-FM HD2 (Chinese radio content); KLFV-FM HD2 (Armenian radio content); KSCZ-LD (Vietnamese video content).

communities. Otherwise, stations will be left with an unwelcome choice between buying an additional EAS device to transmit non-English alerts on multicast channels that often serve small audiences and do not generate consequential revenue,²⁰ or changing the format of their multicast channel(s) to English. Indeed, one major television broadcaster has informed NAB that it will likely purchase additional EAS devices because processing multiple alerts from a single device will delay transmission of alerts as it cycles through a chain of diginets.

Under the FCC's approach, the FCC will pre-translate scripts for the various EAS alert event codes. The scripts would be pre-loaded into a station's EAS device, and when triggered by an alert originator, used to transmit an EAS alert in the primary language of a station. The NPRM appears to require all broadcasters to pre-load the pre-translated EAS scripts in all 13 of the listed non-English languages, as well as in English and ASL,²¹ but provides no reason for this approach. Although we are uncertain of how the pre-translated scripts would be packaged or the necessary software updates designed, it is unclear why, for example, a Spanish-language station should have to download EAS alert scripts and audio in Chinese if it never intends to broadcast in Chinese. NAB queries if the storage memory needed to download pre-translated scripts and accompanying audio for every EAS event in every language could be a factor that forces a station to purchase a new EAS device. If technically possible, it may be more economical for the FCC to allow broadcasters to enable their EAS equipment to transmit alerts in only the primary language of their channel(s).

²⁰ Television: Nielsen NPM (12/26/2022-12/3/2023, LIVE+7 and 12/4/2023-12/17/2023, LIVE+SD), available by subscription at <https://www.nielsen.com>. Radio: Audience estimates are derived in part using Nielsen Audio's Persons 6+/12+ Shares, Monday-Sunday, 6 am-12 Midnight estimates, available at <https://tlr.nielsen.com/tlr/public/market.do?method=loadAllMarket>.

²¹ NPRM at ¶ 13.

The NPRM asks whether stations should be required to transmit a “combined” alert consisting of EAS messages in multiple languages (e.g., first in Spanish for a Spanish-language station and then in English), if the combined version meets the 2-minute and 1,800 character thresholds set forth in the ECIG Implementation Guide.²² As discussed above, transmitting multiple alerts on one station must be voluntary, even if it can be done with one device and within these thresholds. Stations’ capabilities to implement the FCC’s proposal would vary widely. For some stations, this may be the most efficient mechanism in certain situations. However, this will not always be the case, for example, when EAS messages are too long because they contain a long list of affected counties and general instructions like as “Turn Around Don’t Drown®.”

In some cases, as the FCC states, it may be more effective for stations to follow a model similar to that in the ECIG Implementation Guide.²³ Under this approach, a station could first transmit the template alert script and audio in the primary language of its main channel (e.g., English), and then transmit an additional template alert message audio in the primary language of its multicast channel (e.g., French) on only that channel. Here, the French version may be transmitted outside the 2-minute threshold, after the End-of-Message codes for the English version have run, meaning that the French version would essentially air as regular programming, with no EAS header codes or Attention signal. NAB strongly encourages the FCC to allow stations to choose the mechanism that works best for their audience and EAS capabilities. This optionality will not only help rationalize costs, but also promote the widest dissemination of non-English EAS alerts possible.

²² *Id.* at ¶ 19. The ECIG Implementation Guide was developed by the EAS-CAP Industry Group to establish procedures for processing CAP-formatted EAS alerts over the legacy EAS. The Guide can be found at: <http://eas-cap.org/documents.htm>.

²³ *Id.* at ¶ 14.

The flexibility to implement multilingual alerting should also extend to the technology that broadcasters use to process EAS alerts. In December 2022, NAB offered a proposal that would allow EAS Participants to voluntarily use software-based EAS encoder/decoder technology in place of a physical hardware equipment box.²⁴ EAS Participants would remain free to continue using hardware encoder/decoder boxes and receive the manufacturer-provided services attached to such boxes, or choose our more forward-looking option. Any new software encoder/decoder products would have to be thoroughly tested and function seamlessly within the existing EAS system. NAB explained that virtualizing parts of a station's EAS would improve the security, operational readiness, and resiliency of the system.²⁵ Our proposal would also enhance the ability to more easily add updates and new features, including rules changes like multilingual alerting. A software-defined EAS system would also streamline the ability to manage and route EAS messaging (e.g., alerts in different languages) to separate broadcast streams (e.g., HD Radio multicast channels and video channels). NAB's proposal has been pending at the Commission for more than 14 months, despite support from the Federal Emergency Management Office (FEMA) Integrated Public Alert and Warning Systems (IPAWS) office, National Public Radio, and other stakeholders.²⁶ NAB submits that the goal of the NPRM is another reason for the FCC to promptly advance our proposal, and in the interim, allow broadcasters to pursue a virtualized EAS solution as a means to facilitating multilingual EAS alerting.

²⁴ Comments of the National Association of Broadcasters, PS Docket Nos. 15-94, 15-91, and 22-329 at 24-26 (Dec. 23, 2022).

²⁵ *Id.*

²⁶ Letter from Larry Walke, NAB, to Ms. Marlene H. Dortch, PS Docket Nos. 15-94, 15-91, and 22-329 (June 2, 2023), at 1.

IV. THE COMMISSION'S PROPOSAL MAY LIMIT THE USEFULNESS OF EAS ALERTS

A. EAS Message Content May Be Reduced

Notwithstanding the benefits of enhancing EAS access for non-English speakers, some broadcasters are concerned that the FCC's proposal will reduce the effectiveness of EAS by "dumbing down" EAS messages for translation into pre-canned static scripts. NAB agrees with the FCC that it would be impractical to pre-translate scripts of EAS messages that include the variable locations and time parameters of events, and we also agree that translating alerts in real-time is not recommended because reliable text-to-speech (TTS) technology is not yet available.²⁷ As Apple has stated, TTS should not yet be relied on by policymakers in situations where persons could be harmed or injured.²⁸ Therefore, the NPRM seeks comment on the use of static template EAS scripts that provide only general information.²⁹

There will be a trade-off under the FCC's approach between providing access to non-English alerts and the content of alerts because EAS messages will have to be stripped down to the bare essentials for pre-translation into pre-canned scripts. For example, in the case of an Amber alert, while the alert itself would be translated into another language, vital information such as descriptions of the child and abductor's car would not be translated. Such a generalized approach could lead to gaps in the provided EAS information and response delays as Americans try to understand or research what is expected of them during an emergency. NAB is uncertain how to resolve this issue, other than to propose that

²⁷ NPRM at ¶ 22 (stating that reliable TTS "may not be available").

²⁸ Reply Comments of Apple, Inc., at 14, PS Docket Nos. 15-94 and 15-91 (Aug. 21, 2023).

²⁹ NPRM at ¶¶ 22-23.

perhaps broadcasters who receive public complaints about the content of EAS messages could opt of the FCC's requirement.³⁰

The only workable approach within the four corners of the FCC's proposal would seem to involve static non-English scripts of EAS messages that provide as much information as possible and include the variable location and time information in English, whether in cut-outs of the scripted material or immediately following. NAB is uncertain if including a URL address (the FCC offers www.moreinfo.com) where template audiences could obtain more information would be effective.³¹ Doing so would extend the length of EAS messages, and there is no discussion of who would keep such a website with timely information. In addition, history shows that Americans turn to local radio and television stations during emergencies because they are the best resource for detailed, up-to-the-minute news and information, and a URL may just misdirect the public toward a less informative website.

B. More Guidance is Needed Regarding the Display of EAS Messages in ASL

The NPRM's discussion of EAS in ASL further highlights the premature nature of the FCC's proposal. The relevant paragraph consists largely of questions about how such scripts could be developed and implemented, with no justification, research, guidance, or even a proposal.³² Nor does the NPRM address the fact that alerts are scrolled in text across the screen for all to read, including people who communicate in ASL. The FCC also does not ask

³⁰ NAB also understands that, for purposes of creating a visual crawl of EAS messages, existing EAS systems are not capable of generating the characters for all of the proposed template languages. NPRM at ¶ 24. For example, there are letters in the Russian alphabet derived from Cyrillic script that have no English letter equivalents, and Chinese does not even have an alphabet and is written in sequences of characters. To our knowledge, television stations do not have an end-user solution to this problem at the ready.

³¹ NPRM at ¶ 12.

³² *Id.* at ¶ 25.

whether providing the barebones facts in an EAS message in ASL would meaningfully enhance the comprehension of alerts by persons who are deaf or hard of hearing, or possibly disrupt access to a {captioned} live news report or crawl that provides more information than the alert. NAB would generally defer to the expertise of the disability community on such issues.

As for implementation, NAB assumes that including the variable details such as the relevant times and location of an event would be impractical, and agrees with Apple that machine-generated translation of alerts into other languages, such as ASL, should be studied further before policymakers consider their use in high-risk situations. NAB believes that answers to these and other relevant questions should be set forth in a Further Notice of Proposed Rulemaking that reflects more FCC consideration of the issue, as well as feedback from expert commenters. NAB looks forward to working with stakeholders to resolve these issues.

V. THE COMMISSION MUST PROVIDE SUFFICIENT TIME TO IMPLEMENT ITS PROPOSAL

As discussed above, the complexity of implementing the FCC's proposal is unclear, despite the FCC's optimistic presumption that it would merely require installing "a software update of the kind that is routinely installed by EAS Participants in the normal course of business."³³ NAB understands that implementing parts of the FCC's proposal could require some broadcasters to purchase new or additional hardware or software upgrades that must be correctly installed and thoroughly tested. Broadcasters take special care when making any changes to their EAS system, given the life and death role EAS can play, and in most cases enlist the help of a technical expert to ensure functionality when modifying their EAS

³³ *Id.* at ¶ 31.

system. This expertise takes money and time, as most small and medium-sized stations must hire and schedule outside engineering consultants. Thus, both the costs and time to implement the FCC's proposal are unknown, and regardless of whether it demands only a routine software update or something more expensive, broadcasters must be afforded sufficient time to budget for this unfunded mandatory upgrade.

Moreover, as mentioned above, the FCC is also considering another EAS update that would require the addition of an EAS event code for Missing and Endangered Persons. At a minimum, the FCC must allow sufficient time to implement multilingual alerting proposal so it can be installed and tested in the same software update as the MEP code.

Finally, the FCC notes that its multilingual EAS alerting proposal is modeled after recently adopted rules that require Participating CMS Providers to support multilingual WEA through the use of pre-translated alert messages.³⁴ Therein, the FCC established a 30-month deadline for compliance to provide sufficient time for software development and deployment, and to allow small entities time to work through the challenges they may encounter.³⁵ Given that the WEA system is likely more modern and adaptable than EAS, and CMS providers typically have much larger financial resources than most broadcasters, NAB sees no reason why broadcasters and other EAS Participants should not have at least the same 30-month timeframe for complying with the proposals in the NPRM.

VI. CONCLUSION

NAB does not object to the FCC's proposed approach to enhancing the accessibility of EAS for persons who do not speak English very well, However, as described above, NAB

³⁴ *Id.* at ¶ 11 citing *Wireless Emergency Alerts, Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91 and 15-94, Third Report and Order, FCC 23-88 (Oct. 20, 2023).

³⁵ *Id.* at ¶¶ 26-27.

requests that the FCC clarify certain aspects of its proposal to ensure the implementation is simple, economical, and flexible.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan, Larry Walke, Kelly Williams". The signature is written in a cursive style.

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