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
THE NATIONAL ASSOCIATION OF BROADCASTERS

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EXECUTIVE SUMMARY

Local broadcasters are the backbone of the nation's EAS system, and play an indispensable role in the dissemination of Emergency Alert System (EAS) warnings. Because we take that responsibility very seriously, radio and television broadcasters support continued nationwide testing of the Emergency Alert System (EAS). The broadcasting industry took a leading role on technical policy and public outreach during the first nationwide test in November 2011, and we look forward to working with all the relevant stakeholders on facilitating future tests, including the next one that the Federal Emergency Management Agency (FEMA) indicates could take place in 12 to 15 months.

Regarding the specific proposals in the Notice, NAB supports the Commission's plan to adopt a national location code of six zeroes (000000) for national EAS alerts. Implementing such a code should be relatively simple for most broadcasters, in particular, because Common Alerting Protocol-enabled EAS equipment already recognize six zeroes as the national location code. This approach should help ensure that national EAS alerts are processed on a uniform basis throughout the entire EAS system.

We also support using the existing National Periodic Test (NPT) for future testing, at least for the next such test. The NPT code is already recognized by virtually all existing EAS devices, and an NPT-based test would be clearly marked as a test, thereby preventing any public confusion over the true nature of the exercise. This approach test would still allow the Commission to fully assess the dissemination of EAS alerts throughout the system. Most importantly, use of the NPT code is the only reasonable method for meeting FEMA's proposed schedule for the next nationwide test

in 2015. Thereafter, if the Commission and FEMA still see a need to review aspects of the EAS system that an NPT-coded test would not address, NAB would support additional, less frequent nationwide testing using a live Emergency Alert Notification (EAN) code, or an NPT that is reconfigured to fully simulated the EAN. Such an approach would allow continuous refinement of the EAS distribution system, while providing ample time to prepare for, and publicize, a nationwide test that more closely resembles an actual emergency.

NAB also supports actions to enhance the accessibility of EAS for persons with disabilities. We submit, however, that such an effort would only be effective if cable operators may no longer unilaterally interrupt the timely, detailed news coverage of emergency situations provided by television stations with EAS alerts that force-tune all viewers away to another channel. "Cable overrides" also disrupt the exact same EAS alerts that may scroll under a television station's programming. It makes little sense to adopt new standards for the speed, completeness and placement of EAS text crawls carried by television stations when cable operators may simply override such crawls. Instead, the Commission should permit local television stations to opt out of cable system-wide overrides, provided such stations participate in the EAS system. In this way, viewers would be able to receive continuous, comprehensive emergency news from local broadcasters, without reducing the penetration of EAS alerts.

Finally, instead of imposing new criteria governing EAS text crawls, the Commission should heed the overwhelming consensus of commenters in support of a collaborative process that involves all stakeholders in the development of best practices for the presentation of EAS crawls. Moreover, the Notice is wrong to suggest that the

closed captioning rules are a useful model for EAS text crawls. Unlike captions, the content and completeness of EAS crawls may not be within the control of broadcasters because crawls are automatically generated by the particular EAS code triggered by an EAS message originator. EAS messages may also contain acronyms and lack complete punctuation, which would not comply with the closed captioning standards. In addition, presentation of the EAS text crawl may be impacted by the array of downstream devices that produce such crawls, as well as the various sources that provide emergency information to television stations. The captioning rules are also inapplicable because they place responsibility for the content and completeness of captions on video programming distributors (VPDs), which do not exist in the EAS arena because EAS is not "video programming" in the traditional sense of the term, but rather machine-code messages that are automatically generated and distributed through the EAS system, without human involvement.

For all these reasons, NAB requests that the Commission instead convene a collaborative group that includes representatives of the disabled community, EAS participants and device manufacturers, as well as government agencies, to fully vet all the relevant technical and policy issues concerning EAS text crawls, and develop a reasonable set of consensus-based best practices for enhancing the accessibility of EAS text crawls. NAB would look forward to working on such a joint effort.

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The National Association of Broadcasters (NAB)[1] submits comments on the above-captioned Notice of Proposed Rulemaking regarding nationwide testing of the Emergency Alert System (EAS).[2] The Notice seeks comment on proposed rule changes intended to address certain technical issues that arose during the first nationwide test on November 11, 2009, and to facilitate another such test in the near future.[3] As discussed below, NAB supports the proposals in the Notice concerning certain header code elements for Presidential EAS alerts and national tests, and suggests an alternative approach to improving the accessibility of EAS alerts that would reflect the practical challenges inherent in specific standards, especially given the

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[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] *Review of the Emergency Alert System*, Notice of Proposed Rulemaking, EB Docket No. 04-296 (*rel*. June 26, 2014) (Notice). The Notice follows the Public Notice, released in September 2013, in which the Commission sought input on steps it should take to address problems raised by the first nationwide EAS test. *Public Safety and Homeland Security Bureau Seeks Comment Regarding Equipment and Operational Issues Identified Following the First Nationwide Test of the Emergency Alert System,* EB Docket No. 04-296, Public Notice, DA 13-1969 (*rel*. Sept. 23, 2013) (EAS PN).

[3] Notice at ¶ 2. Recent news reports indicate that FEMA is targeting "late 2015 for another national EAS test." Leslie Stimson, RadioWorld, *FEMA IPAWS Targets 2015 for Next National EAS Test* (July 28, 2014), available at http://www.radioworld.com/article/fema-ipaws-targets--for-next-national-eas-test/271525.

continued forced interruption of television stations' emergency programming by cable system EAS alerts.

I. Broadcasters Support Continued Nationwide EAS Testing

NAB endorses the Commission's ongoing effort to strengthen the EAS system. In particular, we appreciate the Commission's steps to improve the reliability of EAS while taking into account the resulting operational and economic impact on EAS participants. Local broadcasters are the backbone of the nation's EAS system. Given their ability to reach virtually all Americans – especially when other communications platforms fail – radio and television stations play an indispensable role in the distribution of public alerts and warnings, including AMBER alerts, which broadcasters helped create in 1996 and to date, have led to the recovery of over 695 missing and abducted children.[4]

As noted in our comments on the EAS PN, the broadcasting industry supported the first nationwide EAS test in 2011. Stations prepared for that test by examining their EAS equipment, and as needed, upgraded their systems prior to the test at their own expense. We also directed a comprehensive nationwide awareness campaign in advance of the test, which included Public Service Announcements that were aired thousands of times as the test approached, as well as numerous announcements and

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[4] AMBER: America's Missing: Broadcasting Emergency Response Alerts, http://www.missingkids.com/KeyFacts (last visited August 6, 2014). As First Informers during emergencies, broadcasters also provide timely, often life-saving information to their local communities, both over-the-air and through other platforms including station websites and mobile apps, and on social media websites like Facebook and Twitter. NAB Comments on Petition Filed by the Minority Media and Telecommunications Council Proposing Changes to the Emergency Alert System (EAS) Rules to Support Multilingual EAS and Emergency Information, EB Docket No. 04-295 (filed May 28, 2014), at 2-4.

discussions of the coming test on national and local newscasts, morning programs and talk shows.[5]

NAB agrees with the Public Safety and Homeland Security Bureau's assessment that the first national EAS proved that the national EAS distribution system is "fundamentally sound." EAS Test Report at 5. Almost all television and radio stations successfully received the live Emergency Action Notification (EAN) code used in the test, and aired it to the public or conveyed it to other test participants, as appropriate. *Id*. at 11. We also agree with the Bureau that the test successfully fulfilled its goal of enabling stakeholders to identify aspects of the EAS system in need of improvement and implement appropriate corrections. [6]

As a preliminary matter, the Notice seeks comment on the nationwide test online reporting system. *Id*. at ¶¶ 22-25. NAB has only two fairly minor suggestions intended to streamline reporting: (1) filers should receive a receipt verifying submission of a completed report; and (2) post-test Forms 2 and 3 should be combined, and EAS Participants allowed ten business days to submit the combined form.

In sum, NAB believes that continued nationwide EAS testing will serve to further enhance the reliability of the EAS system, and America's radio and television broadcasters stand ready to assist the Commission and public safety authorities in that effort.

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[5] Strengthening the Emergency Alert System (EAS): Lessons Learned from the Nationwide EAS Test, *Report*, Public Safety and Homeland Security Bureau, Federal Communications Commission (April 2013) (EAS Test Report), at 9-10.
[6] Notice at 5.

II. NAB Supports the Proposed Header Code Elements

A. Use of a National Location Code

The current EAS rules do not include a location code for the entire United States. Notice at ¶ 11. Therefore, the first national EAS test used the location code for Washington, DC, as a simple expedient to avoid the need to reprogram any EAS equipment to implement the national test. However, use of the Washington, DC code caused problems for some EAS devices that would not fully process an alert tagged with an "out of area" code. In the Notice, the Commission proposes adoption of a national location code of six zeroes (000000) to correct this problem and facilitate future nationwide testing of the EAS system. *Id*. at ¶ 14.

NAB agrees with FEMA and EAS device manufactures that adopting this approach is the most efficient way to ensure more reliable nationwide EAS testing, largely because the Common Alerting Protocol (CAP) standards already deployed in most EAS equipment can already recognize and process six zeroes as the national location code, or that this capability can be easily enabled on most devices.[7] This is consistent with our understanding from radio and television stations that implementing a six zero national location code should be a relatively simple, inexpensive endeavor for most broadcasters.[8]

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[7] Comments on Behalf of Federal Emergency Management Agency Integrated Public Alert and Warning System Program Management Office, EB Docket No. 04-296 (filed Nov. 4, 2013), at 2; *Ex Parte* Letter, Monroe Electronics, MB Docket No. 04-296 (filed Jan. 14, 2014); *Ex Parte* Letter, Trilithic Inc., MB Docket No. 04-296 (filed Jan. 15, 2014).

[8] Reply Comments of Heart Television, Inc., EB Docket No. 04-296 (filed Nov. 19, 2013), at 5.

This approach will help ensure that an Emergency Alert Notification (EAN) will be processed on a consistent basis throughout the entire EAS distribution system.[9] It is critical that all EAN event codes are fully processed so that no EAS devices remain programmed to ignore a national location code.

Finally, NAB supports FEMA's caveat that would allow legacy EAS devices that are not yet fully CAP-compliant EAS boxes and may not recognize six zeroes to be reconfigured as "location agnostic" for EAS alerts that contain a national code. *Id*. Such an approach would be a reasonable accommodation for EAS participants yet to deploy fully CAP-complaint EAS devices.[10]

B. Use of the National Periodic Test Code (NPT)

The first nationwide EAS test used a live-code Emergency Alert Notification (EAN) because this most closely emulated an actual EAS alert. However, the EAN code triggers an automated visual text crawl that indicates an actual emergency is taking place. The Commission thus required EAS participants to display a "This is Only a Test" slide to clarify the true nature of the nationwide exercise. Nevertheless, some deaf and hard-of-hearing viewers still reported confusion because some cable operators were unable to display the test slide. EAS Test Report at 10. To address such problems going forward, the Notice seeks comment on using the existing NPT for future

[9] Comments of the National Cable and Telecommunications Association, EB Docket No. 04-296 (filed Nov. 4, 2013), at 4.

[10] A number of small cable operators have sought waivers from the requirement to deploy CAP-complaint EAS devices on the grounds that they lack physical access to broadband service. *See, e.g.*, *Request for Temporary Waiver of 47 C.F.R. § 11.56*, Telecommunications Management, LLC, EB Docket No. 04-296 (filed Dec. 31, 2013); *Petition for an Extension of a Limited Waiver of the CAP Compliance Obligations*, RB3, LLC and Arklaoktex d/b/a/ Reach Broadband, EB Docket No. 04-296 (filed June 30, 2014).

testing, or a reconfigured NPT that fully simulates the EAN, or to continue EAN-based testing. Notice at ¶¶ 15-21.

NAB believes that using the existing NPT, at least for the next nationwide EAS test, is the most efficient course for EAS stakeholders, including local radio and television broadcasters.[11] First, the NPT code is already included within the EAS rules,[12] and, according to EAS equipment manufacturers, the NPT code is already recognized by virtually all existing EAS devices or can be easily enabled by EAS participants through simple reconfigurations of the code filters on their encoder devices.[13] Second, an NPT-based test would be clearly marked as a test, preventing any public confusion. Third, an NPT-based event would still sufficiently test the

[11] This approach is consistent with the recommendations of the Communications Security, Reliability and Interoperability (CSRIC) working group tasked with reviewing use of the NPT, which recommends testing using the NPT semi-annually. Final Report, CSRIC Working Group 3, National Testing and Operational Issues Task Group (June 2014) at 7.

[12] 47 C.F.R. § 11.31(e). In this vein, we also request clarification on certain matters related to required weekly tests of EAS. Specifically, the EAS rules are currently silent on whether the weekly tests conducted by the FEMA IPAWS Program Office may constitute "required weekly tests," and if so, whether stations must log them. 47 C.F.R. § 11.61(a)(2). FEMA conducts these weekly tests to allow EAS participants to ensure their ability to receive an IPAWS feed from the federal originator. 47 C.F.R. § 11.61(a)(4) states, "The EAS may be activated for emergencies or special tests at the State or Local Area level by an EAS Participant instead of the monthly or weekly tests required by this section." However, it is unclear whether the weekly IPAWS-originated tests are considered to be "special tests," and if so, whether they may take the place of an EAS participant-originated Required Weekly Test pursuant to 47 C.F.R. § 11.61(a)(2). Also, if these tests are considered "special tests" that must be logged, and the participant uses a CAP-enabled encoder-decoder that automatically log tests internally, we request clarification whether such internal logs are sufficient.

[13] Comments of Monroe Electronics, EB Docket No. 04-296 (filed Nov. 4, 2013), at 6 ("It is technically feasible to use an NPT on a national basis."); *Ex Parte* Letter, Trilithic Inc., EB Docket No. 04-296 (filed Jan. 15, 2014) at 3 (explaining that customers need only log into the encoder device from a personal computer and modify the configuration to enable the NPT in the event filters);

reliability of the EAS dissemination ecosystem, providing adequate data for the Commission and FEMA to fully assess the hierarchy and dissemination of EAS alerts throughout the EAS system, via both legacy and CAP-enabled EAS devices.[14] Finally, given all these advantages, use of the existing NPT fulfills what should be the most important goal of this proceeding, namely, clearing a path towards the next nationwide test of the EAS system in the next 12 to 15 months.

We acknowledge that the NPT code has certain drawbacks compared to a live code EAN-based test, or one that uses a NPT that emulates an EAN. Most importantly, an NPT-based test would not simulate an actual alert unlike the EAN which triggers immediate dissemination and supersedes any other regional or local EAS alert or test occurring at the same time. Also, the current EAS rules limit the duration of NPT-coded messages to two minutes, unlike an EAN code which has no maximum length. Further, an NPT-based exercise would not be able to test the automated reset functionality of EAS decoders that do not receive an end-of-message (EOM) code, which may occur during an actual alert. Notice at ¶ 20.

Accordingly, on balance, NAB submits that the benefits of using the existing NPT code outweigh those of a reconfigured NPT or EAN code, at least for the next nationwide EAS test. This is the only approach that will work within FEMA's proposed timetable for the next test. Thereafter, if the Commission and FEMA still see a need to test the full functionality of the EAS system in a manner that closely simulates an actual

[14] *Ex Parte* Letter, Sage Alerting Systems, Inc., EB Docket No. 04-296 (filed Jan. 14, 2014), at 4; Comments of Gary E. Timm, EB Docket No. 04-296 (filed July 22, 2014), at 2. Commenters also note that EAS participants could manually configure their encoders to modify the priority of an NPT-coded test message. Monroe EAS PN Comments at 6-7.

alert, NAB would support a testing schedule that combines intervals of multiple testing methods.[15] For example, nationwide testing could follow a schedule along the lines of the following:

2015: existing NPT code;
2017: live EAN code or a reconfigured NPT code that fully emulates an EAN;
2018: existing NPT code;
2020: live EAN code or a reconfigured NPT;
2021: existing NPT code;
2022: live EAN code or reconfigured NPT; and so forth.

Such an approach would allow almost continuous assessment and refinement of FEMA's ability to issue a message through the Primary Entry Point (PEP) and other relay networks (*e.g.*, SiriusXM, Premier Networks, NPR), while providing ample time to plan and publicize an EAN-based test or implement a reconfigured NPT that simulates an EAN. NAB believes that this process would reasonably accommodate the needs of FEMA and all EAS stakeholders.

III. NAB Supports Practical, Flexible Steps to Enhance Accessibility to EAS Alerts

The Notice seeks comment on improving the accessibility of EAS alerts. Notice at ¶ 34. The Commission notes that some consumers reported that during the nationwide EAS test the visual information was difficult to read because the text crawls generated by the EAN-based test scrolled across the screen too quickly or the font used was problematic. The Commission plans to resolve some of these concerns by establishing minimum standards for EAS visual crawls with respect to crawl speed, completeness and placement. *Id*. at 35.

[15] Such an approach is consistent with the findings of CSRIC Working Group 3, which recommended testing the full range of the EAS system's capabilities on a less than annual basis. CSRIC Working Group 3 Report at 7. See also Sage EAS PN Comments at 11.

A. Improving the Accessibility of Visual EAS Alerts is a Moot Point Unless Broadcast Television Stations Are Able to Provide Uninterrupted Coverage of Emergencies

As a preliminary matter, NAB respectfully submits that imposing new accessibility standards for EAS crawls misses the forest for the trees. So long as cable operators may continue to unilaterally override television broadcasters' emergency programming, mandating accessibility standards will not achieve the Commission's stated goals. Contrary to NCTA's assertions,[16] the ongoing problem of cable overrides is very relevant to this proceeding. Consider the all-too-common situation when a television station's meteorologist is providing timely, detailed reports (often street-by-street) on an approaching storm, only to be interrupted by a cable system's EAS alert; this happens because the system's set-top boxes force-tunes all viewers to another channel where only a short, generic message slide or crawl is displayed.[17] Such overrides disrupt viewers' access to the critical, often life-saving emergency information provided by local television stations, including shelter-in-place or evacuation directions, storm pathways, and the status of power outages. Cable overrides also disrupt the exact same EAS alert that may scroll under the local television station's programming, including AMBER Alerts. These interruptions frequently cause confusion and distress among viewers.[18]

Instead, the Commission should act on NAB's long-standing request to require cable operators to implement "selective override" so that certain channels can be

[16] NCTA's EAS PN Reply Comments at 5-7.
[17] *See, e.g.*, NAB EAS PN Comments at 12-13 (describing the interruption of tornado coverage of NewsChannel 5 in Nashville, Tennessee, by a Comcast override).
[18] Comments of the National Center for Missing & Exploited Children, EB Docket No. 04-296 (filed Oct. 29, 2004), at 10.

selectively omitted during a cable system's EAS interruption.[19] This would provide local broadcast television stations with the ability to opt out of the cable system's universal forced-tuning of all cable channels, enabling the station to offer uninterrupted emergency information. Such an approach would be conditioned on the television station's participation in the EAS system, thereby ensuring that viewers' access to EAS alerts is not compromised. Doing so would also enhance the effectiveness of the Commission's efforts to improve the accessibility of EAS crawls. As NAB has stated repeatedly, the time is ripe for Commission action on this important public safety issue. *See, e.g.*, NAB EAS PN Comments at 11 n. 15 and 14.

B. The Closed Captioning Rules Are Not a Useful Model for Enhanced EAS Crawls

The record in response to the EAS PN supports a process for improving the accessibility of EAS alerts that relies on public-private collaboration to develop best practices for the presentation of EAS alerts. Indeed, representatives of broadcasters, cable, and the disability community all agreed: "The FCC should convene a group of experts to develop a best practices guide for EAS to follow when presenting EAS messages."[20] Despite such cross-sector consensus, the Notice seeks to impose new standards for the accuracy, timing, completeness and placement of EAS crawls, and to make matters worse, bases these new standards on the wholly inapposite closed captioning rules. Notice at ¶¶ 36-38.

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[19] NAB EAS PN Comments at 11 n. 11.

[20] *Report on the National EAS Test On-line Survey and Focus Group Findings*, Rehabilitation Engineering Center for Wireless Technologies (Wireless RERC) (Mar. 20, 2012), at 30, attached to *Ex Parte* Letter, Helena Mitchell, Ph.D., Executive Director, Center for Advanced Communications Policy, Principal Investigator, Wireless RERC, Georgia Institute of Technology, EB Docket No. 04-296 (filed Mar. 26, 2012). *See also* ACA EAS PN Comments at 5; NAB EAS PN Comments at 1.

The closed captioning rules are not a useful model for EAS text crawls. Unlike captions, the content and completeness of EAS crawls are generally not within the control of broadcasters or video programmers. They are within the control of the EAS message originator. The EAS text crawl is often automatically generated by the encoder/decoder device based on data contained in the EAS message, including the EAS code (*e.g.*, EAN) that is issued by an EAS alert originator (*e.g.*, National Weather Service (NWS), local emergency managers). The role of the video programmer, during times of emergencies, is to ensure that an EAS message can be received from the message originator and disseminated quickly to affected areas. The vast majority of EAS alerts are NWS originated.

NWS messages, or messages from state, local or county municipalities, may, or may not utilize acronyms, such as TOR for tornados or shorthand for counties. They often do not include complete punctuation. Yet the accuracy standards set forth in the Commission's February 2014 Order would require full spelling and correct punctuation.[21] Thus, the FCC's new requirements for accuracy are not appropriate model because the EAS originators do not encode EAS messages in a manner that is compliant with Commission's rules.

Moreover, as Sage explained, the presentation of the EAS text can also be affected by another downstream device, which can vary widely in terms of the text formats they generate, including upper or lower case characters, black and white or color text, and other options like animation. Sage EAS PN Comments at 9. And

[21] Closed Captioning of Video Programming, Telecommunications for the Deaf and Hard of Hearing Inc., Petition for Rulemaking, Report and Order, 29 FCC Rcd 2221, ¶ 28 (Feb. 2014).

television stations may receive emergency information from a variety of sources, including their EAS devices, the NWS, state, local public safety offices, or their own news operations, all of which are likely to generate various formats of crawled or displayed emergency information. Given the multiplicity of sources that may deliver EAS messages and emergency information to stations – some of which a broadcast television station may or may not control -- and the various ways stations may present that information, imposing specific standards for the visual presentation of EAS text crawls would not be an effective approach to enhancing the accessibility of EAS crawls.[22]

In addition, there is often no real-time opportunity to modify the EAS text crawl, especially the content, as the EAS crawl is essentially baked into the EAS system. The most obvious example of this would be the EAN code used during the nationwide EAS test, which automatically produced a crawl indicating a real emergency. EAS participants thus were required to overlay "This is Only a Test" slides during the test because they lacked the ability to modify the text of the crawl.[23]

Compare this to the closed captioning rules, which place responsibility for ensuring that captions are accurate, synchronous and complete on video programming distributors (VPDs). In the context of EAS, there are no such VPDs because EAS is not

[22] Specific standards also would not accommodate the wide variety of broadcast facilities. There are approximately 1,800 full power television broadcast facilities in the United States, and almost that many different configurations of such facilities. Stations can range from stand-alone operations that send out only one channel to multichannel facilities, and station groups with hub operations, among other configurations. NAB EAS PN Comments at 9.

[23] *Handbook for November 9, 2011 Nationwide EAS Test*, FCC, at 5, available at http://transition.fcc.gov/pshs/eas/EAS%20Handbook%20-%20National%20Test.pdf.

"video programming" in the traditional sense of the term. Rather machine-coded messages that are automatically generated and disseminated through the EAS system, without human involvement.

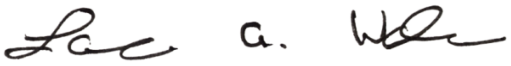
Finally, as demonstrated during the long proceeding on closed captioning, many factors can affect readability, including a consumer's visual acuity, the size of television set, distance from the set, and room lighting. The Commission thus requires closed captioning equipment to have flexible technical capabilities governing the color, opacity, character size, font, and background color that provide consumers with various options for the presentation of closed captions. *See, e.g.*, 47 C.F.R. §§ 79.101-103. These are but a few of the important issues that require further discussion before new EAS text crawl standards are adopted.

For all these reasons, NAB reiterates its call for a collaborative approach to developing flexible, practical criteria for EAS text crawls. Such an approach should involve representatives of the disabled community, EAS participants, EAS device manufacturers, FEMA, NWS and the Commission, that could fully vet all the relevant technical and policy issues concerning EAS text crawls, and develop a consensus, reasonable approach to enhancing the accessibility of EAS. Broadcasters look forward to working on such a joint effort.

IV. Conclusion

NAB supports the Commission's proposals regarding header code elements in EAS alerts, and respectfully requests that a collaborative process be initiated to consider and develop flexible, practical standards for enhancing the accessibility of EAS text crawls.

Respectfully submitted,



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