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

In the Matter of	)	
	)	
Modernization of the Nation's Alerting Systems	)	PS Docket No. 25-224
	)	

COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS

1 M Street, SE
Washington, DC 20003
(202) 429-5430

Rick Kaplan
Larry Walke
David Layer
Kelly Williams

September 25, 2025

TABLE OF CONTENTS

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

In the Matter of	)	
	)	
Modernization of the Nation's Alerting Systems	)	PS Docket No. 25-224
	)	

COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS

The National Association of Broadcasters (NAB)[1] hereby submits comments on the above-captioned Notice of Proposed Rulemaking, in which the Commission begins a reexamination of the Emergency Alert System (EAS) system and explores whether certain fundamental changes could improve the effectiveness of EAS.[2]

I. INTRODUCTION AND SUMMARY

Broadcasters applaud the FCC for launching this proceeding. Of the many ways that television and radio broadcasters serve the public interest, none is more important than the critical role we play in protecting the safety of our viewers and listeners. The architecture of the broadcasting system is particularly resilient and enables local stations to reliably distribute emergency warnings and information to virtually all Americans. Recent events

[1] The National Association of Broadcasters (NAB) is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission (Commission or FCC) and other federal agencies, and the courts.

[2] *Modernization of the National Alerting Systems*, Notice of Proposed Rulemaking, PS Docket No. 25-224 (rel. Aug. 8, 2025) (Notice). The Notice also considers changes to Wireless Emergency Alerts (WEA).

such as Hurricanes Helene and Milton,[3] the Texas Hill Country floods,[4] and the Los Angeles wildfires[5] all underscore the importance of broadcasters during a disaster, as well as Congress's decision to formally designate broadcasters as "first informers" in 2018.[6]

Broadcasters lead the way in ensuring the integrity of EAS through routine testing and investing in new and upgraded EAS equipment, including updates mandated by regulation. And while broadcasters are proud to champion EAS, NAB respectfully reminds the Commission as it considers the ideas raised in the Notice that participation in EAS is essentially an unfunded government mandate.

AM radio serves as the "backbone" of the legacy EAS system.[7] AM radio's ability to transmit signals over long distances, wide accessibility, and superior resiliency make it a critical tool for disseminating alerts. For the same reasons, AM stations make up the vast majority of the EAS Primary Entry Points (PEPs) across the nation, which are stations designed and hardened to reliably reach 90% of Americans and are frequently monitored by other EAS Participants for EAS messages. This "legacy" system works in tandem with the

---

[3] Cameron Coats, *As Hurricane Milton Made Landfall, Radio Is A Difference-Maker*, RadioInk (Oct. 10, 2024), https://radioink.com/2024/10/10/as-hurricane-milton-made-landfall-radio-is-a-difference-maker; Brian Stelter, *Local broadcasters become lifeline for hard-hit North Carolina communities in wake of Helene's wrath*, CNN (Sep. 30, 2024), https://www.cnn.com/2024/ 09/30/media/hurricane-helene-local-radio-north-carolina.

[4] Elle Kehres, *Here's How Broadcasters Are Aiding Texas Flood Recovery Efforts*, RadioWorld (July 10, 2025), https://www.radioworld.com/news-and-business/headlines/heres-how-broadcasters-are-aiding-texas-flood-recovery-efforts.

[5] Stephen Battaglio, *L.A. wildfire coverage shows why local TV news matters in a crisis*, Los Angeles Times (Jan. 19, 2025), https://www.latimes.com/entertainment-arts/business/story/2025-01-19/los-angeles-turns-to-local-tv-news-as-a-beacon-of-trust-during-palisades-wildfires.

[6] 42 U.S.C. § 5189e.

[7] *AM Radio: Backbone of the Emergency Alert System*, WMAL (Aug. 5, 2025) (quoting Troy A. Miller, President & CEO, National Religious Broadcasters Association), https://www.wmal.com/2025/08/05/am-radio-backbone-of-the-emergency-alert-system/.

Federal Emergency Management Agency's (FEMA) IPAWS Open web-based EAS system and provides critical redundancy when the internet or cell service fail during large disasters. To ensure this capability, broadcasters support the bipartisan AM Radio for Every Vehicle Act of 2025,[8] which is intended to help prevent automakers from removing needed access to AM radio in cars.

Below, NAB addresses certain issues in the Notice. In general, NAB strongly supports innovation of EAS,[9] so long as the existing system that has consistently ensured the EAS system's core public warning function for so many decades is preserved. Regarding the role of alert originators (AOs), we believe the FCC should consider additional funding and training that could increase the number of AOs that can use EAS accurately and promote more collaboration among AOs. The FCC should also coordinate with FEMA and the National Weather Service (NWS) to finally resolve any challenges to the NWS's issuance of weather alerts via the FEMA IPAWS feed. NAB opposes extending alert origination authority to non-governmental entities, or mandating EAS participation for non-Presidential alerts. Finally, NAB supports improving the geotargeting of EAS alerts and the security of EAS, provided the current system remains supported, and considering ways to expand EAS to additional media platforms.

---

[8] *AM Radio for Every Vehicle Act of 2025*, S. 315, 119th Cong. (2025-26), https://www.congress.gov/bill/119th-congress/senate-bill/315/text; *AM Radio for Every Vehicle Act of 2025*, H.R. 979, 119th Cong (2025-26), https://www.congress.gov/bill/119th-congress/house-bill/979/text.

[9] NAB has multiple proposed innovations pending before the FCC, such as a request for a clear transition plan for Next Gen TV and a request to allow EAS participants to use a software-based encoder/decoder. Petition for Rulemaking of the National Association of Broadcasters, GN Docket No. 16-142 (filed Feb. 26, 2025); Petition for Rulemaking of the National Association of Broadcasters, PS Docket Nos. 15-94 and 22-329 (filed Mar. 31, 2025) (NAB EAS Modernization Petition).

II. THE FCC SHOULD CONSIDER WAYS TO ENHANCE THE EFFECTIVENESS OF ALERT ORIGINATORS

A. NAB Supports More AO Funding, Training, and Collaboration

We agree with the Commission that allowing government entities at all levels of government to issue alerts best serves the objectives of EAS.[10] A broad approach is needed to quickly respond to the unpredictable nature of emergencies.

Unfortunately, we understand that many government entities do not use FEMA's IPAWS-OPEN system to distribute EAS alerts. A recent report by the Congressional Research Service cited a 2020 GAO report finding that only 70% of the country's population is covered by a local alerting authority authorized to use IPAWS.[11] Thus, a local alerting authority without access to IPAWS may have to find an authorized state official during a crisis to ask the state official send an alert through IPAWS, causing an unnecessary delay in transmitting the alert to the public.[12] According to the CRS IPAWS Report, some of this resistance may relate to the costs of staff and software needed to access the IPAWS feed, which can be burdensome for small or rural government entities.[13] Although many local agencies use federal grants to defray the costs of initiating access, some find it difficult to sustain that investment after their grant expires. To address this problem, NAB encourages the Commission to consider ways to close this funding gap, perhaps through requests for Congressional funding for FEMA to award grants to local entities interested in using IPAWS.

---

[10] Notice at ¶ 8.

[11] GAO, *Emergency Alerting: Agencies Need to Address Pending Applications and Monitor Industry Progress on System Improvements*, GAO 20-294, 2020, at 8, https://www.gao.gov/assets/d20294.pdf.

[12] Peskin, Amanda H., (2025, March 5), *The Integrated Public Alert and Warning System (IPAWS): Primer and Issues for Congress* (CRS Report No. R48363) (CRS IPAWS Report), at 15, https://www.congress.gov/crs-pro duct/R48363.

[13] CRS IPAWS Report at 16.

Another challenge may relate to the training of alert originators.[14] Broadcasters report that sometimes there can be errors in emergency messaging that may be caused by nonstandard alerting systems, or a lack of experience in writing effective alerts. NAB appreciates the FEMA IPAWS Program Office's (PMO) efforts to create and require an extensive training course before an alerting originator can access IPAWS-OPEN.[15] The IPAWS PMO also offers monthly proficiency demonstrations, periodic user conferences and webinars, fact sheets, toolkits,[16] and a Message Design Dashboard designed to help alert originators draft effective EAS messages.[17] Based on many years of working with the dedicated staff in the IPAWS PMO, NAB has no concerns about the quality of these resources. Alert originators must complete a FEMA course and execute a Memorandum of Agreement (MOA) with FEMA to obtain certification to access IPAWS. The MOA lasts for three years; however, it appears that no specific refresher course is explicitly required to renew an AO's certification.[18] NAB submits that one approach to improving EAS use would be for FEMA to perhaps mandate more frequent course training for AOs to maintain access to IPAWS-OPEN.

---

[14] *Id*. at ¶ 22.

[15] *See* https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system/public-safety-officials/sign-up.

[16] *See* https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system/public-safety-officials/alerting-authorities/users-conference-presentations-videos.

[17] *See* https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system.

[18] *Guide to Implementing the Integrated Public Alert and Warning System (IPAWS) Version 2* (Feb. 2019), at 56-57, https://portalfiles.blob.core.usgovcloudapi.net/training/IPAWS_Implementation%20Guide_Final_FEB2019_Version%202.pdf.

The Commission seeks comment on whether allowing various levels of government to trigger alerts can lead to duplication or alert fatigue.[19] According to state emergency coordinating committee (SECC) members and other EAS experts, alert fatigue is not a significant concern regarding alerts issued by state and local agencies. In many cases, local alerting fatigue is prevented by inter-agency collaboration, such as a requirement that local authorities coordinate with a state-level emergency manager before issuing an alert or ask the state-level authority to trigger an alert for a local event. The Commission should promote similar arrangements across the country.

On the other hand, some alert fatigue may be caused by alerts issued by the National Weather Service (NWS), which tracks and disseminates a tremendous amount of dynamic information under difficult circumstances. The breadth of NWS's coverage may unavoidably lead to over-alerting in some cases. One way to address this may be for NWS to consider ways to update its criteria for triggering alerts or fine-tune the accuracy of its geotargeting of alerts or the categories of alerts.

Finally, the Commission seeks feedback on whether EAS, as designed today, allows alerting originators to fully achieve their objectives.[20] This raises one important gap in today's EAS. NWS issues the vast majority of emergency alerts received by broadcasters, and yet, NWS-issued alerts are not passed to broadcasters via the FEMA IPAWS feed. According to the FCC, such alerts are currently blocked pursuant to an NWS request due to unrelated technical issues.[21] Although NAB appreciates the FCC's forethought in considering

---

[19] Notice at ¶ 8.

[20] *Id*. at ¶ 10.

[21] *Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System*, Notice of Proposed Rulemaking and Notice of Inquiry, 36 FCC Rcd 17920, 17929 note 44 (2021).

ways to enhance EAS, any significant changes will have to be implemented via IPAWS, meaning that any such changes will be moot for all but a small percentage of EAS alerts. We note that a CSRIC Working Group has made recommendations regarding CAP-based NWS alerts via IPAWS,[22] but we are not aware of any specific progress that has been made to resolve this issue. We strongly encourage the FCC to coordinate with NWS and FEMA on integrating NWS's emergency alerting feed into IPAWS before advancing any of the concepts discussed in the Notice.

B. Government Agencies Should Maintain Exclusive Authority to Issue EAS Alerts

The FCC asks whether non-governmental organizations should be allowed to trigger EAS alerts.[23] NAB recognizes that problems at public utility companies, chemical plants, and similar entities can demand rapid public warnings. However, we believe it would be unnecessary and counter-productive to allow such entities to be AOs. First, we understand that most of these facilities already have a dedicated connection that provides instant, failsafe communication to a local Public Safety Answering Point, 911 dispatch center, or other certified, trained AO capable of quickly creating and triggering an effective EAS alert.

Second, private companies have different incentives than government emergency management entities. For example, unlike a public safety entity, a private company that experiences a chemical spill or other hazard may be concerned with potential liability or financial impact, which could create an impulse to trigger an unnecessary EAS alert, or issue a wide-ranging alert for a relatively isolated event like a downed power line or traffic accident.

---

[22] CSRIC VII, Working Group 1, *Report on Recommendations To Resolve Duplicate National Weather Service Alerts* (March 10, 2021), https://www.fcc.gov/aboutfcc/advisory-committees/communications-security-reliability-and-interoperability-council-vii.

[23] Notice at ¶ 11.

Overseeing the proper use of EAS by private entities could require substantial resources by local authorities; resources that may be better used for their own EAS use and disaster prevention and recovery. In addition, as the FCC alludes, allowing only government agencies to originate EAS alerts will help preserve consumer confidence in the system and better ensure democratic public accountability for mistakes.[24]

Accordingly, NAB submits that, if the FCC decides to further consider allowing non-governmental entities to issue EAS warnings, it should do so outside the framework of EAS, and instead, treat such a potential change as a parallel but separate complement to EAS.

III. THE FCC SHOULD PRESERVE THE EXISTING PRESENTATION OF EAS ALERTS WHILE CONSIDERING VOLUNTARY OPTIONS FOR ENHANCED VIDEO-RICH ALERTS

The Commission seeks comment on whether it would be more effective for alerting systems to support video messages from the President, as well as from NWS and other AOs.[25] NAB strongly supports technical innovations to enhance EAS. For example, earlier this year, we filed a Petition for Rulemaking requesting rule changes that would allow EAS participants to use software-based encoder/decoder (ENDEC) technology instead of a legacy physical hardware device to process Emergency Alert System messages.[26] We believe that allowing this voluntary option will improve the effectiveness, reliability, and security of EAS.

Similarly, NAB agrees that video-rich EAS messages could make emergency alerts more informative and user-friendly; however, we support considering this approach as a voluntary option for EAS Participants. Distributing video content simultaneously to every EAS Participant and to a broad public audience would require high network availability and

---

[24] *Id*. at ¶ 11.

[25] *Id*. at ¶¶ 9-10.

[26] National Association of Broadcasters Petition for Rulemaking, PS Docket Nos. 15-94 and 22-329 (filed Mar. 31, 2025).

bandwidth. Other than local over the air broadcast television and traditional MVPDs, most video today is consumed on handheld and over the top devices with bitrate capacities that may be overwhelmed during an emergency, When disaster strikes, as we have seen with wired and wireless IP networks, the vast number of individuals trying to use broadband networks to find information about a disaster and contact family and friends can cripple networks.[27] If the amount of data needed to maintain the quality of EAS video outstrips the capacity of the network or the processing power of an end-user device, video EAS messages could suffer from buffering, pixelation, or freezes that could impede public warnings.[28] Although we recognize that video EAS could provide some public safety benefits, it is possible that such benefits could be outweighed by the risks of distributing video EAS messages in an unstable ecosystem, and would therefore encourage the FCC to explore video EAS alerting as a voluntary additive that alert originators or EAS participants could opt out of if appropriate.

For the same reasons, NAB reminds the FCC that the core text and audio messaging provided by broadcasters is the simplest, most reliable system for quickly and broadly disseminating EAS warnings. We have seen numerous situations in which broadcasting provided continuous emergency alerts and information when broadband and cellular networks fail. For example, during Hurricane Helene, cell service in parts of North Carolina

---

[27] *Resilient Networks, Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, PS Docket Nos. 21-346 and 15-80, ET Docket No. 04-35, 37 FCC Rcd 8059 (2022) ("[R]ecent events including Hurricane Ida, earthquakes in Puerto Rico, severe winter storms in Texas, and hurricane and wildfire seasons continue to demonstrate how the United States' communications infrastructure remains susceptible to disruption during disaster events.").

[28] Taylor Soper, *Clogged cell networks during big events: Examining potential solutions to a serious problem*, GeekWire (Sep. 10, 2024), https://www.geekwire.com/2014/city-seattle-emergency-cell-phone/?utm_source=chatgpt.com.

went down at the moment residents needed it the most. Zeb Smathers, mayor of Canton, said that the loss of cell service “crippled” the town’s ability to communicate during and after the storm.[29] Local broadcasting, on the other hand, stayed on the air, delivering critical emergency warnings and information before, during, and after the storm.[30] As WWNC’s Mark Starling explained, "The only thing that was left standing was AM and FM radio."[31]

That said, we understand that alerts including video content may be provided over radio using HD Radio technology. HD Radio may allow emergency alert visuals to piggyback on the radio signal, as do artist and album images. Xperi, provider of HD Radio, believes it may be sufficient to distribute simple hazard-symbol images to all radios equipped with HD Radio.[32] The challenge is that many vehicles on the road today do not have radios that are compatible with HD Radio. Thus, while it is worthwhile to explore changes to EAS that would provide optional methods for video-rich alerting over the radio, it is important to preserve the existing system as a reliable, universally available method of public alerting.

Providing video-rich emergency warnings and information on television presents different challenges. The capability to disseminate advanced emergency information is baked into the ATSC 3.0 Standard. Beyond plain text and an audio tone, ATSC 3.0 could also potentially provide video-enhanced emergency information such as maps, evacuation

---

[29] N’dea Yancey-Bragg, *'No excuse,' mayor says, for Helene victims to be isolated without cell service*, USA Today (Oct. 1, 2024), https://www.usatoday.com/story/news/nation/2024/09/30/hurricane-helene-cell-phone-outages/75449885007/.

[30] *North Carolina radio station was a critical lifeline after Hurricane Helen. Then it became the voice of recovery.*, CBS News (Mar. 31, 2025), https://www.cbsnews.com/news/north-carolina-radio-station-hurricane-helene-recovery/.

[31] *Id*.

[32] *The FCC Wants to Add More Visuals to EAS. HD Radio Could Play a Role*, InsideRadio (Apr. 18, 2022), https://www.insideradio.com/free/the-fcc-wants-to-add-more-visuals-to-eas-hd-radio-could-play-a-role/article_3f31d85e-bee7-11ec-b083-0fe0e6d0ca6f.html.

routes, and shelter locations. Given these potential benefits, NAB supports the FCC's exploration of ways to incorporate video or visual images within EAS messages as an optional complement to existing EAS, and encourages the FCC to promptly move forward with establishing a nationwide transition to Next Gen TV.

IV. EAS PARTICIPATION SHOULD REMAIN MANDATORY ONLY FOR PRESIDENTIAL ALERTS

The FCC asks whether EAS should be updated with a goal to guarantee delivery of all alerts regardless of the situation, or whether alerting should instead require only a "best effort" attempt at delivery.[33] The Commission also seeks comment on whether certain types of alerts, such as Presidential alerts, should be guaranteed, and whether the fact that participation in EAS is not mandatory for non-Presidential alerts may reduce alert originators' confidence in EAS.[34]

EAS participants already make their best effort to process EAS alerts and are subject to steep penalties for malfunctions and mistakes,[35] even paperwork mistakes.[36] No rules can ever "guarantee" that alerts will always be relayed. Sometimes, it is simply impossible for a broadcast station to relay an EAS alert because severe weather or something else beyond their control forces a station off air. Fortunately, the broadcast system is the most resilient communications platform. When disaster strikes, nearly all local broadcast stations have alternative transmission pathways if their antenna or studio is affected, and a generator and fuel reserves in case of an extended power outage. In addition, the sheer

---

[33] Notice at ¶ 12.

[34] *Id*.

[35] *See, e.g., ESPN, Inc.*, Notice of Apparent Liability for Forfeiture, File No.: EB-IHD-23-00035802 (Oct. 10, 2024).

[36] *See, e.g., Goodrich Radio, LLC, Licensee of AM Station WPRR, Ada, Michigan, Notice of Violation*, File No.: EB-FIELDNER-24-00036509 (May 30, 2025).

number and geographic diversity of local television and radio stations in an area help to ensure redundancy in the event that a few stations go off the air during an emergency. Redundancy, not rules, is the best way to attempt to guarantee the delivery of EAS alerts.

We do not believe the voluntary nature of non-Presidential EAS is significant, and if anything, helps to increase the effectiveness of EAS. First, this approach helps to prevent alert fatigue by empowering local broadcasters to tailor the frequency and content of alerts based on their familiarity with the demographics and geography of their local communities, instead of following a rigid government-mandated one-size fits-all approach. This approach also allows broadcasters to weigh the need for an EAS message against the detailed information a station may already be airing about an event, which may be interrupted by the EAS message.

Second, broadcasters note that sometimes local emergency management authorities may lack training in the use of EAS, which can lead to less than ideal alerting. In some locales, state-level authorities use the voluntary nature of broadcaster participation in EAS like a hammer to help ensure that local alert originators use EAS judiciously.

Finally, voluntary participation in non-Presidential EAS alerting may facilitate self-selection, so that stations choosing to participate are more likely to be engaged and invested in the success of EAS, instead of being forced to participate just to fulfill a government requirement.

V. REDUNDANCY IS THE MOST EFFECTIVE WAY TO ENSURE RESILIENCE

The Commission states that it is reasonable to expect alerting systems to incorporate resilience to common causes of disruptions to communications, such as power outages and

physical damage, and seeks comment generally on how to increase the resilience of EAS.[37] NAB is pleased to report that most radio and television stations already take steps to ensure continuous operations during a disaster. The architecture of broadcasting allows stations to provide uninterrupted service during an emergency even when the electrical grid, cellular service, and the Internet are down.[38] Broadcast facilities are designed with redundant systems and backups, alternative transmission sites, and emergency power. Also, the large coverage areas of radio stations and relatively few facilities (compared to cellular networks) make it more possible to "harden" broadcast facilities than cellular network facilities. Most broadcast stations also have a generator and fuel stores that can power the station for at least several days, during which the station is generally able to obtain more fuel.

Not only do broadcast stations have internal redundancy, but radio and TV are further redundant because there are nearly always multiple stations in a market, one or more of which is likely to stay on the air. For example, DIRS Status Reports for Hurricane Helene showed that two-thirds of the cell sites in the impacted areas in North Carolina were out of service as of September 29, 2024. At the same time, only three TV stations and two radio stations in North Carolina reported going off the air.[39]

NAB strongly supports measures designed to increase the resiliency of EAS, and submits that one of the best steps toward that goal is to preserve the legacy "daisy-chain" EAS system. Broadcasters appreciate the enhanced features and flexibility that are made possible by the FEMA IPAWS system, but we note that IPAWS relies on the nation's IP-based

---

[37] Notice at ¶ 13.

[38] Comments of the National Association of Broadcasters, PS Docket Nos. 21-346 and 15-80, and ET Docket No. 04-35 (Dec. 16, 2021), at 2-3.

[39] *Communications Status Report for Areas Impacted by Hurricane Helene* (Sep. 29, 2024), https://docs.fcc.gov/public/attachments/DOC-405897A1.pdf.

communications infrastructure which can be vulnerable during a major emergency. The legacy system provides a failsafe redundant pathway for EAS even when the internet or cell service goes down, and thus, should not only be preserved, but enhanced through steps like NAB's request for permission to use a software-based ENDEC which will further increase the effectiveness and reliability of legacy EAS.[40]

VI. NAB SUPPORTS IMPROVING THE GEOTARGETING OF EAS ALERTS

We agree with the FCC that improving the geotargeting of EAS alerts would benefit public safety by highlighting warnings to populations in harm's way while filtering warnings to those outside the affected zone.[41] NAB notes that, to a certain degree, local broadcasters already geotarget alerts by virtue of their service contours, especially radio stations that serve relatively small geographic areas or populations. The average full-power FM radio station can reach anywhere from about ten to 30 or 40 miles, depending on a station's class designation and frequency, and the terrain and atmospheric conditions in the area.[42] For all but the largest disasters, targeting EAS alerts within such an area is likely sufficient.

Of course, more specificity would be better, and one approach may center on how the National Weather Service targets EAS alerts. We understand that, when NWS issues an alert for a storm, it determines a polygon area based on the storm's direction, speed, and location, and then moves the polygon in time with the storm's predicted path so only populations likely to be affected receive the EAS alert. The codes that NWS uses to generate EAS alerts rely on pre-defined areas like counties, so when NWS issues a polygon-based EAS alert, the system will disseminate the alert to the entirety of all counties that intersect with

---

[40] <cite NAB Petition here>

[41] Notice at ¶ 14.

[42] 47 C.F.R. § 73.211.

the polygon, including populations that may not be near the relevant area.[43] Compare this to WEA, which is designed to target alerts to mobile phones within a more precise polygon area, instead of county boundaries. Mobile phones can use their built-in GPS to gauge if they are within the polygon.[44] If the NWS could fine-tune its codes and process to confine EAS alerts more accurately within polygons, regardless of county boundaries, fewer populations may receive irrelevant warnings.

As the FCC notes, another approach would be to improve EAS geotargeting from the receiver end, similar to WEA. In order for this to work, a consumer broadcast receiver would need the embedded technology required to be aware of its location, interpret the emergency message, and determine if the message applies to its location. As mentioned above, ATSC 3.0 has the potential to deliver "Advanced Emergency Alerting" which could contain geo targeting data that a properly configured NextGen TV receiver could use to determine if the emergency message is geographically relevant.[45] HD Radio may have similar capabilities to enhance the geotargeting of radio EAS alerts. For more information on these technologies, please refer to the comments of ATSC: The Broadcast Standards Association, and Xperi, Inc., the owner of HD Radio technology.

VII. NAB SUPPORTS ENHANCING THE SECURITY OF EAS

NAB agrees with the Commission that improving the cybersecurity of EAS is important to prevent an adversary from being able to issue a false alert or prevent a real alert from

---

[43] *Partial County Alerting Technical Discussion*, National Weather Service, https://www.weather.gov/surface/pca_technical.

[44] *How to Gauge a Tornado Threat: Alerts and Polygons Explained*, Survive-A-Storm Shelters (Apr. 19, 2024), https://survive-a-storm.com/blog/how-to-gauge-for-tornado-threat-watches-warnings-and-polygons-explained/.

[45] Ed Czarnecki, *ATSC 3.0: A New Value-Added Approach for Emergency Alerting*, TV Tech (July 15, 2017), https://www.tvtechnology.com/atsc/atsc-30-a-new-valueadded-approach-for-emergency-information?utm_source=chatgpt.com.

being broadcast.[46] That said, the benefits of incorporating additional authentication and validation into the EAS system must be weighed against the potential effect on the timeliness and reliability of alerts. Any additional layers of security should be backwards compatible with the existing system, which uses certain codes and digital signatures to provide a level of security, while ensuring the rapid processing of EAS alerts. If the FCC requires additional authentication of EAS messages, such as more stringent signature validation requirements or certificates, more latency could be injected into the system that could affect public safety, at least during fast-moving weather situations. Adding authentication, validation, or certificates to alerts issued through National Weather Radio and distributed through the existing broadcast station "Daisy Chain" could be particularly problematic. This will require NWS to modify its SAME protocol and potentially increase the length of the "brap brap brap" sound at the beginning and end of broadcast EAS messages, which consumers could find annoying. Nevertheless, NAB supports exploring this issue further, and urges the FCC to make sure that any additional security measures do not reduce the effectiveness of EAS.

VIII. NAB SUPPORTS CONSIDERATION OF APPROACHES TO EXPANDING EAS TO ADDITIONAL MEDIA PLATFORMS

NAB agrees with the Commission that shifts in how the public consumes media warrants consideration of how to update public alerting to reach people engaged on platforms that are not currently equipped to process EAS. We believe that the reliability and reach of public alerting over radio and television via the existing EAS system remains an entirely effective method for public warning, but recognize that people spend many hours on

[46] Notice at ¶ 15.

other platforms that do not participate in EAS, such as streaming services, social media outlets, gaming consoles, personal computers, wearable technology, and others.[47]

However, there are different considerations depending on the platform. For example, NAB has previously discussed the challenges of expanding EAS to Internet streaming services.[48] We explained that pure-play online content streamers are not well-positioned to participate in the existing EAS system because their large coverage areas and infinite coverage of cloud-based services make it effectively impossible to monitor for EAS alerts based on geography or type of alert.[49] The limitless reach of streaming services also makes it impractical to geo-target the transmission of alerts.[50] We also noted that streamers are generally unregulated, often headquartered outside the United States, and frequently use hardware or servers they do not own or control, all of which raises questions as to how streaming services could ensure the security and reliability of EAS operations, and what would happen if they failed to relay alerts.[51]

One approach, as the FCC inquires, may be to focus on end-user devices.[52] NAB submits that the FCC should explore ways to promote the connection of smart devices to the Internet so that more EAS messages could be received via the appropriate IPAWS feed and relayed directly to individuals. Such an approach could enhance public safety, and put more control over the presentation of alerts in the public's hands, including language and other accessibility features, and the "waking up" of receivers.

---

[47] *Id*. at ¶ 18.
[48] Comments of NAB, PS Docket Nos. 15-94 and 15-91 (May 14, 2021).
[49] *Id*. at 4-5.
[50] *Id*. at 5-6.
[51] *Id*. at 6-7.
[52] Notice at ¶ 19.

On the other hand, consumers receiving un-curated messages directly from an alert originator could lead to alert confusion, and it is important that such an approach does not disrupt public access to local broadcasting. If a viewer is watching a local broadcast station when an EAS alert is issued, the smart television receiver must remain on the local station while the alert is processed and broadcast, and not automatically change to some other channel or streaming application for the alert to be relayed or accessed. For more than two decades, local television stations have repeatedly described the disservice imposed on some television viewers who are automatically switched away from a broadcaster's live, detailed coverage of an emergency in favor of a cable operator's blue screen that carries only a bare-bones EAS message slide.[53]

Television broadcasters provide in-depth emergency news that can include the live tracking of tornados, hurricanes, fires, and other fast-moving disasters, as well as the status of industrial emergencies, which help Americans make critical decisions like whether to shelter-in-place or evacuate, and how to assist family and friends. All of this timely, in-depth information is sometimes still interrupted by some cable systems that force-tune viewers to another channel when an EAS alert is issued. Although many of these problems are avoided through contractual agreements between local broadcasters and cable systems,[54] there may not be an opportunity for similar arrangements between broadcasters and smart receiver manufacturers. Accordingly, NAB strongly supports considering ways to enhance

---

[53] *See, e.g.*, Comments of the National Association of Broadcasters, PS Docket Nos. 15-91 and 15-94 (June 8, 2016), at 7-9.

[54] GAO, *Emergency Preparedness: Current Emergency Alert System Has Limitations, and Development of a New Integrated System Will Be Challenging*, GAO 07-411, 2007, at 11 note 10.

EAS through inclusion of smart receivers, we also urge the FCC to avoid repeating the kinds of problems that cable overrides have caused over the years.

IX. CONCLUSION

For the reasons stated above, NAB supports the FCC's further consideration of ways to enhance EAS, while preserving and promoting the legacy EAS system as a critically important redundant failsafe backup. Broadcasters take pride in their unique role in EAS, and look forward to partnering with the FCC, FEMA, and other stakeholders on future enhancements that would increase public safety.

Respectfully submitted,

Rick Kaplan
Larry Walke
David Layer
Kelly Williams

National Association of Broadcasters
1 M Street, SE
Washington, DC 20003
(202) 429-5430

September 25, 2025