



The

# ***Broadcasters' Desktop Resource***

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... edited by Barry Mishkind – the Eclectic Engineer

## **EAS Q&A**

### **How to be Heard on Part 11 Changes**

***By Clay Freinwald and Barry Mishkind***

*[March 2010] The FCC has now asked for comments on how to improve the Rules in Part 11 – those dealing with EAS. So, of course, we turned to Clay to answer our basic questions.*

**Barry:** Clay, The FCC has requested comments on potential changes to Part 11, the EAS Rules. Is this the wholesale reworking of Part 11 that has been needed for years?

**Clay:** According to Tom Beers (during the recent EAS Summit held in Washington, DC), this is the first phase - Phase II will be an NPRM (Notice of Proposed Rule-Making).

**Barry:** OK. What are some of the key things you would like to see come out of this process?

**Clay:** There are several different areas that need to be addressed:

1. The Required Weekly and Monthly Tests need to be changed and made more useful.
2. The Rules need to incorporate procedures for unattended stations.
3. The Rules need to be updated to handle EAN activations, including, as mentioned, for those at stations that are unattended.
4. Attention needs to be given to the problems of cable systems overriding TV station alerts so that essential information is not covered over by the cable system reacting to another station's EAS activation.
5. There needs to be a clearer focus on who to train and how to train them. Since many stations have automated their EAS tests, the EAS Handbooks need to be revised to accommodate the current practices.
6. There should be a formalized training program for Emergency Managers and their staffs, so that what is transmitted is useful and not unintelligible or invasive to the stations' programming.

**Barry:** Is the SBE filing comments on this?

**Clay:** Since I am no longer the Chairman of the SBE EAS Committee, I cannot say for certain, but it would seem to be a good idea. As you know, many ideas have already been advanced.

**Barry:** Would you encourage folks to make their own comments on this matter?

**Clay:** Everyone should do so. This was highly encouraged by Tom Beers.

**Barry:** How should folks tell the FCC where to go on EAS?

**Clay:** First off – tell them *nicely*.

Comments should key in on:

- Where the Part 11 Rules have gone wrong.
- What corrections you think should be made.
- How things should work to make the system better
- Why you think the changes will accomplish that.

**Barry:** How can someone file their comments with the FCC?

**Clay:** From the [FCC Notice located here](#), there are three ways to file comments. I would recommend reading the notice to see what the FCC is asking and then:

- **Electronic Filers:** Comments and reply comments may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs> or the Federal eRulemaking Portal: <http://www.regulations.gov>. Filers should follow the instructions provided on the website for submitting comments. (For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the rulemaking number.)
- Parties may also submit an electronic comment by Internet e-mail. To get filing instructions, filers should send an e-mail to [ecfs@fcc.gov](mailto:ecfs@fcc.gov) and include the following words in the body of the message: “get form.” A sample form and directions will be sent in response.
- **Paper Filers:** Parties who choose to file by paper must file an original and four copies of each filing.

If everyone takes the time to be heard, the process will accomplish more for everyone.

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*After many years as Chairman of the SBE’s EAS Committee, Clay Freinwald continues to work with FEMA, DHS, the FCC PSHSB, and other groups working on the next generation of EAS gear and plans. Do you have a question? Please ask Clay at [k7cr@blarg.net](mailto:k7cr@blarg.net) or [BDR-Editor@theBDR.net](mailto:BDR-Editor@theBDR.net)*

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