



The

Broadcasters' Desktop Resource

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... edited by Barry Mishkind – the Eclectic Engineer

Broadcast Operations

Magical Thinking, the MTTC, and the EAS



By Richard Rudman

[April 2014] Sometimes a great solution for a problem comes from counterintuitive thinking. But thinking outside of the box does not always achieve success. As an example, Richard Rudman lays out reasons why something that seems good can be more a problem than a solution.

Since 1975, I have missed only two NAB Spring Conventions, watching the changes and innovations in broadcasting and electronics.

This year it seemed to me that many vendors at NAB were sporting devices to connect various flavors of signals from Point A to Point B using fiber optics. While this is not exactly new, for those of us who grew up in a metallic and electrically conductive world, it does almost seem magical to transmit audio, video, and RF via silicon, a form of non-conductive sand.

Yet, by thinking out of the box, scientists created something that opened the way for many more advances.

THINKING THAT IS NOT SO MAGICAL

There is an intriguing parallel being played out regarding the EAS – but in reverse. Political and

cultural pressures are warping development of sensible policies based on reality. Magical thinking abounds.

It was magical thinking that was being played out in the EAS world where I spent most of my time when not on the NAB exhibit floor. The Minority Media and Telecommunications Council (MTTC) is proposing changes based on magical thinking regarding the EAS.

To be sure, the thrust of their proposals sounds good, and is very much in keeping with current political thinking. However, it would place new and unreasonable burdens for multilingual emergency information on EAS Participants:

For example, in their original petition:

- The MTTC asked that Primary Entry Point (PEP) stations be required to air all Presidential level messages in both English and in Spanish.
- The MTTC would require a “Local Primary Spanish” (LP-S) designation and provide that state and local EAS plans would designate an LP-S station in each of the local areas in which an LP-1 has been designated.

- The MTTC would have us include a Local Primary Multilingual (LP-M) designation in local areas where a substantial proportion of the population has its primary fluency in a language other than English or Spanish.
- The MTTC would require that at least one broadcast station in every market would monitor and rebroadcast emergency information carried by local LP-S and LP-M stations.
- The MTTC would specify in Part 11 that, if during an emergency a local LP-S or LP-M station lost its transmission capability, stations remaining on the air should broadcast emergency information in affected languages (at least as part of their broadcasts) until the affected LP-S or LP-M station is restored to the air.

BUT WHERE ARE THE RESOURCES?

Aside from the fact that other languages than Spanish are not mentioned in the MTTC Petition, their proposals fail to recognize that local and state EAS event carriage is voluntary – nor that broadcasting simply does not have the resources to do what they are asking.

Given that a growing number of LP-1 and LP-2 stations have already “un-volunteered” from that responsibility since the EAS began in 1997, and that other stations exercised their right from the start of the EAS to not relay many types of EAS events, adoption of some or all of what the MTTC seeks will only make matters worse.

Broadcasters already understand this. But the MTTC and many in government apparently do not. If the MTTC proposals are enacted in whole or in part they could bring the current and delicate state of voluntary state and local EAS participation to a screeching halt.

WHO IS RESPONSIBLE?

Some EAS experts feel that the responsibility for multilingual messaging should rest with local government emergency managers.

However, this is not merely another version of the state vs. federal tug-of-war that plays out in so much of today’s political dialogue. This is an issue best understood based on the reality that *all emergencies, at their heart, are local.*

That said, in some markets there are dozens and dozens of languages spoken widely among a significant number of people. What is the critical mass at which point announcements need to be made in a particular language?

GETTING THE MESSAGE OUT

Let us start with an inconvenient EAS truth: Unless people are tuned in, they never get information from the EAS.

It occurs to me that when we talk about EAS alerts and warnings, the people behind the open FCC item are making a basic assumption that the audience at risk is tuned in to English language content no matter what their mother tongue may be. Yet, why would people be tuned in to content delivered primarily in English if they have “zero competence” in that language?

Indeed, if a population segment that does not speak English is sufficiently turned inward to their own local cultural support system, how “tuned in” can they ever be?

Furthermore, since so many stations run unattended and, as the state and local EAS is “voluntary,” I am having a lot of trouble supporting a position that EAS Plans should do what is being suggested as a mandate in Part 11 or that multilingual ongoing EPI (Emergency Public Information) should be generated by EAS Participants.

If the writers of a Plan want to do this, there is nothing to stop them.

On the other hand, putting such multilingual monitoring and announcement assignments in a written EAS Plan could cause more problems than it would solve.

NOT A PART 11 ISSUE

I would submit that the EAS non-English language issue does not fall within the broadcasting or cable wheelhouse. Instead, responsibilities for it actually lie within the emergency management community for fulfillment.

This leads me to the conclusion that non-English content issue should not be made a mandatory part of any state EAS plans. As we said in the CSRIC (Communications Security, Reliability and Interoperability Council) Plans report on many issues: *one size does not fit all* – and each SECC should work with their EM community to put in their plans or not put in their plans elements for which there is agreement and support from top to bottom.

After all, how else do you get the EAS community to buy in as volunteers?

DRAWING THE LINE

That is why the now public CSRIC IV Plans Subgroup report was based on guidelines that drew a line between what the FCC can mandate and what must be left to voluntary efforts at the state and local levels. Should not the non-English language issue follow similar guidance?

Does this therefore leave the EAN as the only case where the FCC's EAS Rules could call for non-English language?

Or, can the NAB develop information on ESL (English as a Second Language) people tuned in to English-speaking content? I seem to remember some research was done on this by some radio advertising people, but cannot remember who did it.

Nevertheless, we return to the apparent reality that minority language audiences will certainly seek out media content in their first language, but, if there is none, they will go to English language content *if they have even a modicum of English language understanding.*

That is why the emergency management community should supply EAS participants with EPI and warnings (as a subset of EPI) in the aural and visual form(s) that the government entity they work for spells out, based on local community makeup, no matter the local language mix.

Thus, selecting the right lingual warning mix should be keyed to who has to be warned, and what their language skills are, not on assumptions that Spanish is the second language of our country.

ASSESSING THE RESOURCES NEEDED

Personally and professionally, I have wrestled with this issue since the advent of EAS in Los Angeles.

For example, I have seen a Spanish language station promise to do much of what the MTTC wants but, in the end, did not live up to their promise. In fact, they eventually opted out. For that reason, the LP-S designation has been removed from the LA County EAS Plan and there are currently no volunteers to step up.

Only magical thinking would give us reason to believe an FCC mandate would suddenly provide multilingual alert information for even one language group, much less the panoply of languages with advocates.



**NOT THE RIGHT TIME
NOT THE RIGHT WAY**

Maybe those of us who want to solve the quandary of delivering protective actions to people at risk who are not fluent in English should petition for delay of action on the MTTC Petition – at least until an assessment of true needs and capabilities is done in pilot project or elsewhere.

I am happy to note that the MTTC itself has called for a delay in action at the FCC. Perhaps they have gotten enough feedback to see the pitfalls and are ready to reach out to EAS professionals for advice and guidance on possible ways to reach their goals.

Unfortunately, the bottom line to the existing proposals is that there is no way broadcasting and cable can address this challenge without the help of government entities (and their emergen-

cy managers) who serve populations with non-English speaking population segments.

Merely magically wishing such a program into action will only result in bureaucrats and broadcasters squabbling over who is responsible for what and that, in turn, can only lead to a failure to accomplish the task.

On the other hand, with some mutual respect and solid cooperation, the emergency management community and broadcasters can indeed provide a public service unlike anything the Internet or cellular systems alone can provide.

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