



The

Broadcasters' Desktop Resource

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... edited by Barry Mishkind – the Eclectic Engineer

EAS CAP Town Hall on the Part 11 FNPRM



By Richard Rudman

[June 16, 2011 - This report is an edited version of my notes jotted down during this event, I have taken the liberty to paraphrase.]

Moderator:

Suzanne D. Goucher
President & CEO
Maine Association of Broadcasters

Panelists:

Antwane V. Johnson
Division Director & Program Manager,
Integrated Public Alert & Warning System
(IPAWS)
Federal Emergency Management Agency

David D. Oxenford
Partner
Davis Wright Tremaine LLP

Kelly Williams
Senior Director of Engineering and
Technology Policy
National Association of Broadcasters

Suzanne introduced the panel and mentioned that the first topic would be the FCC's Further Notice of Proposed Rulemaking (FNPRM) on Part 11 Released May 26. Later in the broadcast

it was announced that the official publication date in the Federal Register that will trigger the start of the 30 day Comment period is expected during the week of June 20. The 15 day Reply Comment period will start after the 30-day Comment period concludes.

Suzanne announced that the FCC was not able to participate in this Webinar due to ex parte rules having to do with open Rulemakings.

Suzanne then asked Kelly Williams (NAB) about the apparent decision to not jump right into CAP and keep alive legacy EAS using the SAME protocol.

Kelly Williams stated that the way things will work for the foreseeable future is that broadcast stations will not actually air CAP messages. Any CAP message received will be translated into the legacy SAME protocol as a default for the public. He went on to say that the FCC/FEMA acknowledges the importance of maintaining the existing SAME EAS protocol.

David Oxenford brought up the issue of introducing redundancy into the process.

(He did not elaborate, but he may have been referring to the generally recognized need to

build a national public alert and warning system that has multiple ways to get messages through to entry points and the public.)

Suzanne brought up the issue of the shortcomings of text crawls for TV and cable in legacy SAME. From the viewer's perspective, would it not be better to go to full blown CAP so they could get more accurate "crawl" information on warnings?

Kelly said that the audience would not get less than they get now. To the extent stations can use new equipment or internal resources stations can provide crawls that can contain more information. In his opinion, local station operators know how best to serve their publics, and that's OK.

Suzanne noted that, as the Commission pointed out in the NPRM, it wants consistency in the text messages in order to avoid viewer confusion.

Kelly again mentioned that he respects local decisions that are made on this issue.

Suzanne then asked Antwane Johnson (FEMA) about the requirement that all entities subject to EAS have to be able to accept CAP RSS feeds to comply.

Antwane – he said that RSS is a fairly well known way to share information with the approximately 20,000 plus broadcasters and cable systems that will have to comply.

He said that RSS gets around the issue of having to maintaining separate connections for this purpose, and allows stations to have only specified firewall ports open, thereby cutting down on risks at the broadcast/cable end to do safe polling thru their firewalls.

Suzanne asked Antwane if he foresaw problems with 20,000 EAS devices polling all at once. Antwane thought this was manageable.

Suzanne then asked Kelly about the issue of the lack of IP connectivity everywhere.

Kelly said this is certainly an issue since there is no broadband now in some rural areas, and none on the horizon anytime soon.

He also mentioned that there is still some dialup access in use. He said there might be a way for dial up to work but did not elaborate. He concluded by saying that waivers may be necessary for stations that do not have sufficient IP connectivity.

Suzanne then asked about setting up state relay for EAN's.

Antwane answered that legacy EAS will remain in place, and FEMA/IPAWS will work to help establish IP connectivity capability. He emphasized that there are challenges for this.

David then talked about the tight FNPRM Comment window and all the other issues that observers think that there is apparently not sufficient time to do. He mentioned that the FNPRM asks what timeline should really be. He also talked about cost questions the FCC raises in the FNPRM, and mentioned there are also non-monetary costs involved. He also implied that waivers for IP connectivity issues could happen.

Suzanne stated that she thought it was interesting that FCC brought up hardware issues and other matters that might delay the 9/30 CAP reception implementation deadline.

David said this reminds him of the DTV transition. He said that a lot of smaller broadcasters are still concerned about CAP equipment acquisition issues, not wanting to buy a box that may need changes.

Kelly mentioned that the FCC had to go through certain legal steps in writing the FNPRM and that it was appropriate to ask the all questions they are asking. Kelly also said that hardware

choices should be up to vendors and broadcasters.

On the continuing of RS-232 ports, he thought that if FCC says they are not needed, some people might disagree. He implied that it might be best if the FCC sets up a set of minimum requirements, rather than hard-and-fast mandates on what should or not be the hardware configuration of CAP EAS devices.

Suzanne then asked Antwane if IPAWS would be ready by 9/30. Antwane said yes. He said that he expects a late August announcement for the IP address for the private broadcaster feed.

Suzanne brought up Paragraph 15 of the FNPRM tech standards that talks about mandating the ability of radio, TV and cable to be able to accept "Next Generation EAS" messages.

Antwane said that we should keep in mind that standards, including the one for CAP, will evolve and that FEMA/IPAWS may want to adopt other standards in the future. He said there is an ongoing need to have the ability to leverage standards and protocols as they evolve.

Suzanne then asked Kelly about (1) the likelihood of the need for FCC to certify equipment beyond the FEMA process and (2) about so-called intermediary devices.

Kelly said that CAP converters should be allowed but there are issues that each station needs to decide as to whether they should go that route, or not. Kelly went on to say that the FCC has to find an answer to the certification issue. He mentioned that legacy EAS will not change, so the question is if new features require FCC certification, or not.

Antwane mentioned that anyone can find out if CAP EAS devices have passed muster by going to FEMA RKB site:

[<https://www.rkb.us/>].

Suzanne then brought up the Governor Mandatory Carry (GMC) issue.

David said that in 2007 the FCC announced that there will be GMC without really thinking about the ramifications such as how will that actually work, the need for special codes, message priorities, and how deep designation of GMC will go. There are also regional EAS issues – which governor will talk for a given region, and how should state plans be rewritten to account for GMC?

Suzanne then asked rhetorically that if there were not a state plan revision, would there then be no burden to have GMC? She then asked if GMC should just simply go away.

David offered the opinion that some states may want it.

Suzanne went on to ask Kelly about the advisability of getting rid of the FCC EAS Handbook as is suggested in the FNPRM.

Kelly said it was an interesting question. He thinks the Handbook serves several good purposes. For instance, it is good to have a procedure so operators know what to do. He sees a role for both the Handbook and locally written plans.

Suzanne then mentioned that the FCC did not really address the issue of formalizing State Committee (SECC) authority and existence. She remembers that the FCC once appointed some SECC Chairs. So, commenters may want to address this in the open item.

David offered his opinion that by the FCC approving plans they have already recognized State committees.

Suzanne brought up the issue of the disconnect between the long-standing EAS and state officials.

Antwane mentioned that the first national live code EAN test will occur on 11/9/11 at 2 PM EST. He thanked the FEMA/IPAWS partners who have and will be working on this project. Regarding what will be aired, he said it would be a “this is a test” message 3-3-1/2 minutes in length. It will be similar to what was done on the two Alaska live code tests. Like Alaska, the text message will probably be repeated.

Suzanne stated that the President would not voice the message.

David went on to say that it would not be a political message.

Antwane went on to say that the message will be the same for radio and TV and everyone will be broadcasting message at the same time. The test will look for and assess weaknesses and ultimately come up with mitigation steps to improve the process. There will also be an effort to inform the general public on what the EAS is.

Suzanne asked what should be on screens viewers see for a background for the visual test message? Will FEMA develop a background? Antwane said it would be a partnership decision with consistency as the goal.

Suzanne asked about public education for the test.

Antwane said there will be an aggressive education campaign that will be set up by FEMA and the FCC. He mentioned the Roundtables that have been and will be held as well as FEMA meetings with states and regions.

There was some discussion about the need for outreach to all local public safety access points (PSAP’s) that handle 911 calls.

Antwane said there would be outreach in cooperation with the national 9-1-1 organization, NINA.

Suzanne then brought up the issue of training.

Antwane mentioned a recent meeting with FEMA Region 9, and an aggressive training effort through FEMA’s Emergency Management Institute (EMI) to (1) assist emergency managers in crafting more effective alerts and warnings, (2)CAP compliance training, and (3) to help everyone including the public know what EAS is.

There was time for some questions emailed in during the Webcast.

Will there be a way to map SAME messages to CAP?

Kelly said that the CAP protocol is well documented on the OASIS international standards setting organization’s site, and that the EAS CAP Industry Group (ECIG) has full documentation on the EAS – CAP profile that EAS devices must use to parse CAP messages for broadcast and cable. He reminded everyone that CAP is a subset of the widely used XML markup language. As far as mapping SAME to CAP, he suggested anyone interested in doing that should talk to manufacturers of EAS equipment.

Will FEMA get information out prior to the national test to assure better results?

Antwane said, yes. Lessons learned from the two Alaska tests will be circulated as industry best practices on the IPAWS website.

A question was asked about the continued need for the RMT.

David said that he did not recall any suggestions in the FNPRM to drop the RMT.

Suzanne brought up the issue of the two-tone attention signal.

Kelly mentioned that he was the individual who wrote NAB’s petition to shorten the original two-tone attention signal to 8 seconds. He said he did not know if the Attention Signal tones should go or not at this point.

David offered his opinion that the attention signal could have continued value as an alert to sight-impaired people that a warning is being issued.

Suzanne concluded by thanking the panel, and that questions asked during the web cast that were not answered will be responded to at a later time.

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Richard Rudman is a founding member of the Broadcast Warning Working Group (BWWG) which hosts the EAS Forum at <http://eas.radiolists.net>

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