

Draft Part 11 Comments and Suggestions, Ver. 1

Items 1-33 developed by the CSRIC Working Group 5. Items 34 - 44 and comments on CSRIC items by the Broadcast

Warning Working Group (BWWG). **BWWG contributions and comments are in RED.**

| Item | Ref. | Suggestion | Comment |
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| 1 | §11.1 | Update paragraph to include new CAP related alert originators. | Additional originators are tribal, territorial, and Gov't Must Carry. There has to be guidance here on how deep the "governor-designee" can go. Can or should governors be able to designate NWS EAS messages as "must carry"? |
| 2 | §11.2(a) | Update PEP definition to be consistent with FEMA implementation and future plans. | We need to see exactly what FEMA is and will do for PEP. Does FEMA Need to give us a current road map before this can be addressed? |
| 3 | §11.11 | Update paragraph to include reference for interface requirements to IPAWS source. | The EAS system is reliant on the IPAWS for EAN originator messages. |
| 4 | §11.11 | Consider adoption of ECIG Implementation Guidelines. | Look at what FEMA has adopted and consider whether to adopt the FEMA document or the guideline in the original form. |
| 5 | §11.11(a) | Addition of the requirement for receiving and decoding CAP originated messages, also necessitates adding CAP reception in the definition of minimum requirements for EAS Participants. EAS Participants will require the ability to monitor and receive both CAP and legacy EAS protocol messages, and further transmit EAS protocol messages in formats congruent with other Part 11 subsections. | Current 11.11(a) only has a requirement for existing (legacy) EAS equipment, and thus needs to be updated in light of 11.56. Might be a good place to specify compression requirements for CAP message attachments. |
| 6 | §11.11(a) | "EAS Equipment Requirement" tables need to be revised to reflect the range of new CAP EAS equipment necessary for the monitoring, reception, decoding, and video/audio display of alerts. | Current 11.11(a) only has a requirement for existing (legacy) EAS equipment, and thus needs to be updated in light of 11.56. |
| 7 | §11.13 | Is there a need to update EAN relative to CAP compliant capability? | Note for CAP compliance writers |
| 8 | §11.14 | Modify PEP paragraph to include reference requiring IPAWS interconnectivity. | |
| 9 | §11.20 | "State Relay Networks" should be updated to accommodate the relay of CAP originated messages to EAS participants via the addition of state CAP relay networks. | With the amended monitoring requirements in §11.52, Part 11 rules need to be amended to reflect CAP EAS monitoring within state relay networks. Add information technology to paragraph. |
| 10 | §11.21(a) | Include language on EAN distribution via IPAWS. | IPAWS distribution now augments PEP distribution of EAN. |
| 11 | §11.21(a) | "State and Local Area plans and FCC Mapbook" should be updated to include CAP. | As above |
| 12 | §11.21(b) | "State and Local Area plans and FCC Mapbook" should be updated to include CAP. | As above |
| 13 | §11.31 | Clarify how Governor Must Carry messages are to be implemented in EAS Protocol. | E.g., create GOV originator code. Better to repurpose existing codes. "Classic" EAS devices that will still be in service can only put out what is burned in to their PROM's. - Although both the Sage and TFT could have a new ROM made. Didn't TFT allow almost unlimited copying of their last EPROM update? |
| 14 | §11.32(a) | Modify EAS encoder minimum requirement. | EAS encoder must be capable of rendering a fully CAP compliant message. |
| 15 | §11.32(2) | Modify Inputs | Include requirement for a single Ethernet input with support for multiple IP sources. What about USB inputs for recorded material? |
| 16 | §11.33(a)(1) | Add CAP input interface requirements. | Device specifications need to be updated for CAP monitoring, in accordance with 11.52. |
| 17 | §11.33(a)(1) | Add Ethernet input and multiple IP source | |
| 18 | §11.33(10) | Message validity expanded to include handle duplicate messages and use CAP message by default. | Per the ECIG Implementation Guide |

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| 19 | §11.34 | Add FCC certification for CAP EAS devices. | IPAWS NIMS conformance testing only provides verification of a project-specific CAP data format, and is therefore necessary for the IPAWS project, but not sufficient for the overall CAP-EAS endeavor. The proper CAP-to-EAS translation function is not included in the IPAWS NIMS conformance tests. Therefore, it is necessary that the FCC continue and extend its statutory role in EAS certification to CAP EAS devices. ALL new CAP-capable systems, both hardware and software based, Need to be FCC-certified. CAP-Converter devices need to be tested for compatibility with existing "classic" EAS devices. |
| 20 | §11.35(a) | "Equipment operational readiness" – Need to update to include the CAP receiving requirement | §11.56 requires EAS Participants to receive CAP messages. |
| 21 | §11.44(b) | Modify EAS Participants priority. | Add reference to additional messages from Tribal, Territorial and Gov't Must Carry. NWS? Should it be added? |
| 22 | §11.45 | Modify Prohibition to reference CAP "Actual" status indicators. | CAP messages of status "Actual" as stated in ECIG. |
| 23 | §11.51(1) and (5,i,1) | Equipment must be capable of rendering a CAP compliant message to EAS. | As opposed to simply generating an EAS code. |
| 24 | §11.51(m) | Add Gubernatorial Must-Carry CAP status. | |
| 25 | §11.51(4) and (5) | Insert "Wireline Video Systems" | Carrier is currently excluded from both paragraphs. |
| 26 | §11.52(a) | "EAS code and Attention Signal Monitoring requirements" – Require CAP receiving equipment. | §11.56 requires EAS Participants to receive CAP messages. |
| 27 | §11.52 | A new subparagraph is needed to require EAS participants to monitor multiple IP-based CAP alert sources (i.e. CAP servers), in addition to legacy (audio) EAS alert sources. EAS participants should monitor at least one state and/or local CAP EAS source (i.e. CAP server) in addition to a Federal CAP source. | Monitoring multiple CAP sources is necessary to ensure redundancy and support the mandatory Gubernatorial Must-Carry message in §11.55(a). The requirement for this must be keyed to State plans. |
| 28 | §11.54(1) | Monitor IPAWS | In addition to the statement of two EAS sources for national alert (EAN). |
| 29 | §11.54 | Consider adding (14) | EAS Messages will be broadcast only if the scope of CAP alert is "Public" |
| 30 | §11.55(a) | The mandatory Gubernatorial Must-Carry message requires additional definition. | This provision raises a number of questions, including whether a separate EAS event code may be needed for this function. |
| 31 | §11.56 | Consider extending the 180 day clock to 360 days. | The trigger point starting the clock, as well as the length of the clock, need to factor in the following criteria in relation to CAP-based national alerts (EAN): 1. FEMA adoption of CAP. 2. FEMA initiates IPAWS network for EAN dissemination 3. IPAWS conformance testing of devices/systems to be potentially connected to the IPAWS network 4. FCC type certification of any CAP EAS devices mandated for EAS participants. Other factors the commission must consider are how long it will take EAS participants to implement the following: |
| 32 | 11.61 | RWT/RMT | Should the RWT be eliminated, perhaps a replacement of a different kind of RMT ... maybe every three weeks, with provisions for dealing with failed tests? Failed tests should not be subject to the EB silliness. |
| 33 | General Comments | Recommend commission develop a more streamlined method for changing codes to more swiftly enable EAS participants' use of new codes requested by authorities. | Current method of changing and adding event codes is regulatory. We recommend that commission consider modification of the procedure to an administrative process. Reference <eventCode> element specification (4) at line 160 in CAP v1.2 USA IPAWS Profile v1.0. |
| 34 | | Part 11 clarification on upgrades for EAS equipment | Should Part 11 clearly put the burden of upgrades on manufacturers who ship product before their product is FCC-certified to the new Part 11 standards? |
| 35 | | Part 11 clarification on version information | Should the FCC put in Part 11 that all devices should easily be able to report out the version level of what's inside? |

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| 36 | | Part 11 clarification on reporting results of tests and real EAS events | Should there be something in the rules so CAP EAS boxes, in addition to reporting to the station, would allow a station to voluntarily report out to their LECC and/or the SECC on monthly and national test results? |
| 37 | | Should Part 11 specify aggregator standards? | Should the revised Rules flesh out who has the responsibility to make sure aggregators work to a common aggregation standard. -Are not directly or indirectly charging licensees for ANY aggregation services |
| 38 | | Should Part 11 specify aggregator certification and standards? | Should the FCC should in Part 11 outline how they are going to certify CAP-EAS aggregators and how aggregators will maintain their certification? |
| 39 | | Should Part 11 specify a standard for audio and video compression of attached information | The FCC should specify that audio and video file attachments should be in a format so they will not create lengthy payload-intensive CAP-EAS transmissions over IP, never as uncompressed files. BWWG, NASBA and NAB could approach Fraunhofer about their proprietary compression algorithms. Failing that, Part 11 should specify use of the OGG non-proprietary open compression algorithms. Two suggestions: •Theora - a lossy video compression format and software •FLAC - a lossless audio compression format and software [http://www.xiph.org/] |
| 40 | | Part 11 and the EAS user experience for people at risk | Part 11 should have a section dedicated to the EAS user experience to take full advantage of the power of the CAP. Each non-AMBER CAP-EAS message should contain five text and voice components addressing key needs of an audience at risk: 1. The exact nature of the emergency or alert needs to be made clearly. 2. A specific location of the event (not a county name!) needs to be given taking advantage of the CAP's geotargeting specificity. 3. Information to help travelers identify where they are in relation to the event. 4. The exact call sign and location of the transmitting station. 5. What the listener should do to take effective protective action. |
| 41 | | Making the EAS mandate meaningful | Direction (or at least suggestions) should be given in Part 11 to warning originators to provide information on where to find ongoing information on the emergency. This of course implies forming partnerships with broadcasters and other entities that can provide such information. While beyond the scope of 47 CFR to "tell" emergency management what to do, EAS experts agree that such guidance would aid in the formation of such partnerships. It is hard to fulfill the existing or expanded EAS mandate when the originators of warnings are not a formal part of the mandate |