

(NEW) EMERGENCY ALERT TEST REPORTING SYSTEM (“ETRS”)

OCTOBER 2016

SUMMARY

By way of background, the primary purpose of the development of the Emergency Alert System, or “EAS”, and its precursors, was to provide a mechanism by which the entire U.S. population could simultaneously be made aware of nationwide emergency situations. The system was then further developed to permit regional, state and local official entities the ability to warn of impending disastrous weather conditions or other circumstances that could have a significant impact on, or pose a threat to, individuals in those locations.

In 2010, the Federal Emergency Management Agency (“FEMA”) went on to adopt a digital messaging standard known as the “Common Alerting Protocol”, or “CAP”, which was to be the next step in transforming the “EAS” system as we have known it, and the first nationwide EAS test took place in November, 2011. This test revealed a number of deficiencies which needed to be addressed, and the Commission devised a three step reporting process in order to glean the needed feedback from EAS participants, which brings us to the new incarnation of the system being employed, the “Emergency Alert Test Reporting System”, or “ETRS.”

IMPLEMENTATION OF “ETRS”

With the release of its Public Notice (PN) on April 18, 2016 describing the specifics of the development and implementation of the new ETRS system, FEMA announced its plan to conduct a second nationwide test of the EAS on **September 28, 2016**. In conjunction with the (then) upcoming test, the PN provided information for EAS participants as to how to register for an ETRS account and directions regarding the ETRS reporting process to be associated with the test, a process similar to that utilized in concert with the November, 2011 test. The PN provided “screen grabs” of the on line forms associated with the new ETRS, **which went live on June 27, 2016**.

However, before any forms can be accessed, the filer must go to the ETRS page and register for an account via the registration page link on the FCC’s website. Upon successful completion and submission of this information, the FCC in turn emails the user its assigned ETRS username and password, and additional instructions for using the ETRS system and completing the required forms.

A brief description of the forms and dates by which participants are to submit them in the event of a nationwide test are, as well as the dates associated with the just passed September 28th test, are provided below.

- **Form 1** – “Identifying and Background Information” – is to be on file within 60 days of a scheduled nationwide test. (In the case of the most recent 9/28/16 test, the

date by which Form 1 was required to be on file was **August 26, 2016**). The Commission did provide until **September 26th** to make any minor corrections, however, the registration process was to have been completed by August 26th to be considered “in compliance” with the overall participant obligations.

Some, but not all, of the information required includes the participant’s name, contact information, legal name of the EAS participant and the participant’s FRN (FCC Registration Number) and associated password and information pertinent to the station’s location and its EAS monitoring assignments. Filers should confirm that the coordinates for the station are pre-populated or manually edited to reflect North American 1983 (“NAD 83”) datum, as most of the FCC’s CDBS forms require this information in NAD 27 format. There is a conversion program on the FCC’s website should the coordinates not pre-populate in NAD 83 format.

- **Form 2** – “Day of Test Reporting” – This form is to be filed within 24 hours of the completion of a nationwide test (that would have been **September 28th by 11:59 pm ET** for the just passed test), and the form should repopulate with the information entered in Form 1. The two additional questions posed are simple: 1) did the station receive the EAS alert, and, 2) was the station successful in retransmitting the EAS alert.
- **Form 3** – “Detailed Test Reporting” – This form is to be filed within 45 days of the conducting of a nationwide test (that date is **November 14, 2016** for the just passed September 28th test) and requires responses to more in depth questions about the station’s participation in the test. Again, the form should repopulate with the prior information from both Forms 1 and 2 and then asks for additional specific info. This includes a reaffirmation as to whether the station did, or did not, a) receive the EAS alert, but now also asks from what source and how readily it was received and, b) whether the alert was successfully retransmitted. Drop down menus are provided with options to describe any complications, if they were encountered, including audio quality, duplicate messages or equipment performance issues, among others. Once the filer confirms that the information on the form is correct and is then reviewed and certified, the form will be submitted.

There are additional features in the reporting system that are applicable to group station owners such as batch filing and coordinator indicators for these purposes. However, the above information is applicable to most individual participating EAS stations.

In its Public Notice released on July 18th, the FCC indicated that a secondary nationwide test date of **October 5, 2016** would be conducted, if necessary, in the event the September 28th test date was cancelled due to widespread severe weather or other “significant event” but this was not required.

EAS COMPLIANT EQUIPMENT REQUIREMENTS

So, now that we’ve covered the reporting process, let’s focus on the actual first requirement, which is the implementation of EAS compliant equipment. By **July 30, 2016**, EAS participants were to ensure that the station’s EAS decoder can:

- a) process the new “six zeroes” national location code (000000) when a nationwide EAS test or alert is initiated; and,
- b) process a National Periodic Test (NPT) event code. This code shares the priority and two minute time limit of all other event codes, and EAS participants must retransmit messages with the NPT code immediately upon receipt.

Prior to the July 30th deadline, licensees should have ensured that its equipment has the latest software and firmware updates such that it is capable of polling FEMA’s IPAWS-CAP Servia via the internet, in compliance with the current FCC Rules. Sage, Monroe Electronics, Gorman-Redlich and TFT have the software updates available on their respective websites. These updates also support the three new National Weather Service event codes of “Extreme Wind Warning” (EWW), “Storm Surge Watch” (SSA) and “Storm Surge Warning” (SSW).

A waiver request filed by Gorman-Redlich, to permit older EAS boxes (which do not recognize the six zero national location code) to continue to be used was denied on September 27th, a day before the national test. This last minute action on the Commission’s part may have played some role in some of the issues that still have to be addressed in the overall assessment of the success of the 9/28/16 test.

Also, until further notice, the new EAS Operating Handbook, published in August, 2016, which may be revised after a full review of the 9/28/16 test is completed, is still the version you should use until further notice.

OVERALL ASSESSMENT OF 9/28/16 NATIONWIDE EAS TEST AND REPORTING SYSTEM

By most descriptions as of this writing, the September 28th nationwide EAS test was a success. Most participating stations said they successfully received the test with clear audio, and that it relayed as expected. Of the stations that did not receive the test, here are some of the possible reasons:

- a) Many indicated that they had not updated the firmware or that the firmware update “didn’t take” and needed to be reloaded.
- b) Some did not relay the test but, again, this was likely related to the right firmware not having been installed or other user issues.
- c) A few reported poor audio – this was largely the case where a Local Primary (LP) was picked up but the received analog signal wasn’t clean.
- d) A small number of stations reported no audio during the test. At the moment, the suspicion is on a possible update that failed to load properly but more information is needed to come to a definitive conclusion here.
- e) Finally, it is unknown at this time how many stations have simply been ignoring EAS. It is expected that after Forms Two and Three are filed and analyzed that more will be known here.

With respect to the ETRS itself, there were some low points reported by users such as an inability to access the ETRS site or being unable to get the site to respond. Some of these issues are likely to be associated with the system having been overloaded on “the day of” filings but more needs to be known on this before the next scheduled national test would be announced.

Specifics relating to the implementation of any aspect of the current EAS/ETRS should be discussed and addressed by your FCC legal counsel, qualified contract or chief engineer and/or consulting engineer.

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