



December 5, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: National EAS Test, ED Docket No. 04-296

Dear Chairman Genachowski:

The National Association of Telecommunications Officers and Advisors (“NATOA”) has long advocated for the expansion and improvement of our country’s public safety communications systems. We were encouraged when the Commission announced that the first nationwide test of the Emergency Alert System (“EAS”) would be conducted on November 9, 2011. The stated purpose of the test was to evaluate the system’s reliability and effectiveness in alerting the public to a national emergency.

Following the test, NATOA conducted a brief survey to obtain feedback from local government communications professionals. Seventy-six (76) local jurisdictions responded to the survey with the vast majority (74%) stating that they observed the test over cable television stations, while approximately one-fourth of the respondents viewed the test over local broadcast stations. Approximately 30% of the respondents viewed the test on PEG channels, with most observing the test on government channels, followed by public access and educational channels.

Roughly 70% of those observing the test noted video interruptions in programming, consisting of either a full screen or crawl alert message, while slightly more than half experienced audio disruptions of either alert tones or test announcements. However, many respondents reported “no change – no interruption of normal broadcast;” “no test audio or video displayed;” “nothing happened;” and the like.

Although some respondents reported few, if any, problems with the test (“everything appeared to work on Comcast”), the majority of survey comments were negative in nature. For example, many respondents noted the poor audio quality of the test: “voice garbled, unintelligible;” “audio volume was too low;” “too loud;” “all audio was extremely distorted;” and “test tones were playing over voice announcement.”

Another area of concern focused on the uneven presentation of the test in the same market: “3 of 4 local PEG stations had audio;” “nothing happened on Comcast in our jurisdiction, but according to the county engineer, Verizon and RCN were successful;” and “network stations seemed to be running it but not cable.”

Twenty-five percent (25%) of the respondents stated that they monitored over-the-air television broadcasts, but only two-thirds of those reported seeing the test.

Over-the-air radio broadcasts were monitored by approximately 18% of the respondents, with nearly 80% of those reporting they heard the test.

And finally, approximately 8% of the respondents reported monitoring satellite television services, with the vast majority (nearly 84%) stating they saw the test.

NATOA is prepared to assist the Commission as it continues to obtain and analyze the EAS test results. It is essential that all viewers, regardless of channel being viewed or the means by which that channel is brought into the home, has access to this critical public safety service.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Traylor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen Traylor
Executive Director
NATOA