



June 2016

WORKING GROUP 3
EMERGENCY ALERT SYSTEM

Final Report – Updating the EAS Operating Handbook

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1 Results in Brief

1.1 Executive Summary

The Federal Communications Commission (Commission or FCC) established the Communications Security, Reliability and Interoperability Council (CSRIC) "...to provide recommendations to the FCC regarding ways it can strive for security, reliability and interoperability of communications systems... including... emergency alerting." To achieve that goal, CSRIC V established and chartered various "Working Groups" to examine the various issues of concern in these areas.

Working Group 3 (WG3) was formed to make recommendations for the CSRIC's consideration in three major areas related to the continued improvement and development of the Emergency Alert System (EAS) as a secure, effective alerting tool for the American public:

1. EAS Security;
2. the provision of EAS in languages other than English; and
3. the update of an operational handbook for individual broadcasters, cable service providers and other EAS Participants

This Final Report was prepared by the CSRIC V WG3 Project Team on Updating the EAS Operating Handbook. In this report, the WG3 makes recommendations concerning an updated EAS Operating Handbook, and related documentation.

According to 47 CFR Part 11, §11.15 of the Commission's rules, all EAS Participants must have a copy of the EAS Operating Handbook located at normal duty positions or EAS equipment locations when an operator is required to be on duty, and be immediately available to staff responsible for initiating actions associated with the EAS process. Published by the FCC, the EAS Operating Handbook states in summary form the actions to be taken by personnel at EAS Participant facilities upon receipt of an EAN, tests, or State and Local Area alerts. The current handbook is obsolete and contains inaccurate instructions.

Working Group 3 was tasked to "analyze the manner in which the EAS should operate for each type of EAS Participant (e.g., broadcaster and cable service provider facilities) and shall make recommendations for textual and visual elements of a handbook suitable for each category of EAS Participant, with particular attention to be given to rural, smaller and less resourced EAS Participants."

The Project Team developed four deliverables:

- (1) An Updated EAS Operating Handbook
- (2) Instructions for completing the customizable sections in the new Handbook
- (3) An outline for the suggested content of an EAS Participant Guide
- (4) A list of EAS rules identified as needing update, which concern Handbook topics

An Updated EAS Operating Handbook: This was our Project Team's primary mission. We determined that most of the material in the current Handbooks needed to be updated, so the decision was made to start clean with a new, simpler document. After careful analysis, we felt we would be able to replace the current set of five separate EAS Operating Handbooks (one for

each EAS Participant category – Radio, TV, Cable TV, Satellite and Wireline), with just a single version for use by all EAS Participants. We accomplished this goal by employing the use of checkboxes and fill-in-the-blank operational steps for each EAS Participant facility to customize the Handbook to describe its particular implementation of EAS alerting. Examples demonstrating the flexibility of this strategy include the ability to describe:

- Attended vs. Unattended operation
- Automatic vs. Manual mode operation
- Mixed use of Automatic mode part of the time and Manual mode at other times
- Operation as a decoder-only broadcast station
- The differences between typical facilities in the various EAS Participant groups
- Variations in EAS equipment operation
- Variations in the desired recovery procedures at each EAS Participant facility when problems with alerts are encountered

As an additional requirement to facilitate the use of a single version of the updated EAS Operating Handbook by all EAS Participants, we identified the need for a generic description of the person responsible for EAS applicable at any EAS Participant facility. At broadcast stations, the FCC rules establish the Chief Operator as responsible for EAS operations, but there is no such position established in the FCC rules for other EAS Participants. Thus we created the term “designated individual responsible for EAS operations and compliance at each EAS Participant facility” in order to keep the EAS Operating Handbook generic for use by all EAS Participants.

As a final criterion, we concluded that the EAS Operating Handbook should be written to the operator on duty to give that person the information needed to handle the FCC-required EAS alerts. To maintain this focus, we eliminated any superfluous details that are not needed by the operator on duty to relay or originate the alerts required in the EAS rules. This resulted in a very clean and straightforward updated Handbook. We strongly recommend that no other content be added to the Handbook. To address the more general EAS details not needed by the operator on duty in the EAS Operating Handbook, we suggest below that the Commission consider developing a separate EAS Participant Guide based on the topic list we provide.

Instructions for EAS Operating Handbook: Our recommended, updated EAS Operating Handbook contains a combination of checkboxes and fill-in-the-blank operational steps to allow each EAS Participant facility to customize the Handbook to describe its particular implementation of EAS alerting. It is our intent that these blank sections be completed by the designated individual responsible for EAS operations and compliance at each EAS Participant facility. In order to assist that individual in understanding the intent of each blank section, our Project Team drafted a set of instructions. These instructions should be posted on the FCC website, along with the EAS Operating Handbook.

Suggested Content of an EAS Participant Guide: Acknowledging that the EAS Operating Handbook is specifically written to the operator on duty to determine the steps necessary to relay or originate the alerts required in the EAS rules, our Project Team felt that an additional document aimed at the designated individual responsible for EAS operations and compliance at each EAS Participant facility may be of benefit for the Commission to highlight EAS details needed by this EAS responsible individual but not needed by the operator on duty in the EAS Operating Handbook. We suggest the title EAS Participant Guide, and in this report present in

outline form a list of the proposed topics for this Guide.

EAS Rules Identified as Needing Update: Our final deliverable is a list of issues in the EAS rules discovered while drafting the updated EAS Operating Handbook. We recommend that the FCC consider updating those rules to remove obsolete concepts and clear up ambiguities.

In addition to the four deliverables, the Project Team adopted the following recommendation:

Support from Manufacturers: Our Project Team recommends that the FCC encourage each EAS equipment manufacturer to define for its users how to implement the various choices discussed in the Handbook and its associated Instructions. The guidance should clearly reference each task in the Handbook, and provide help and understanding about how to accomplish each task with that manufacturer's equipment, either by reference to existing documentation or with new documentation, using the particular manufacturer's terms and technologies.

2 Introduction

CSRIC V Working Group 3 was established to make recommendations for the CSRIC's consideration in three major areas related to the continued improvement and development of the Emergency Alert System (EAS) as a secure, effective alerting tool for the American public: (1) EAS Security; (2) the provision of EAS in languages other than English; and (3) the update of an operational handbook for individual broadcasters, cable service providers and other EAS Participants.

In order to address the relevant issues, a diverse team of subject matter experts was recruited to participate. The following areas of expertise are represented within the group.

- Message Originators: FEMA; NWS; State & Local Emergency Managers; State EAS Networks
- EAS Participants: Radio; TV; Cable TV; Satellite TV; Satellite Radio; Wireline Video/IPTV
- EAS Equipment Manufacturers
- State Emergency Communications Committee Chairs and Members
- EAS Experts and Consultants

CSRIC Working Group 3 is divided into three sub-groups:

- **EAS Security** – Recommend steps for assessing any barriers to the adoption of the CSRIC IV best practices, make recommendations on incentives, both regulatory and non-regulatory for affected stakeholders to adopt the best practices, and recommend methods by which other EAS stakeholders may gain assurance that the best practices are being implemented.
- **Multilingual EAS** – The Working Group will recommend best practices for the delivery of multilingual EAS and emergency information.
- **Updating the EAS Operating Handbook** – Update and modernize the EAS Handbook, which states in summary form the actions to be taken by personnel at EAS Participant facilities upon receipt of an EAN, tests, or State and Local Area alerts.

In the description of Working Group 3, the Commission expresses concern that the current EAS Operating Handbook “is obsolete and contains inaccurate instructions”. This is of particular importance, as the Handbook describes the steps necessary at EAS Participant facilities to relay a message from the President.

In this report, WG3 discusses recommendations for an updated and modernized EAS Operating Handbook suitable for use by all EAS Participant facilities.

2.1 CSRIC Structure

Communications Security, Reliability, and Interoperability Council (CSRIC) V							
CSRIC Steering Committee							
Chair(s): WG # 1	Chair(s): WG # 2	Chair(s): WG # 3	Chair(s): WG # 4	Chair(s): WG # 5	Chair(s): WG # 6	Chair(s): WG # 7	Chair(s): WG # 8
Susan Sherwod	Francisco Sanchez	Steven Johnson	Kent Bressie	Rod Rasmussen	Brian Scarpelli	Bill Boni	William Reidway
Jeff Cohen	Farrokh Khatibi	Kelly Williams	Catherine Creese Jennifer Manner	Christopher Boyer Brian Allen	Joel Molinoff	Drew Morin	Thomas Anderson
WG # 1:	WG # 2:	WG # 3:	WG # 4:	WG # 5:	WG # 6:	WG # 7:	WG # 8:
Evolving 911 Services	Emergency Alerting Platforms	Emergency Alert System	Communications Infrastructure Resiliency	Cybersecurity Information Sharing	Secure Hardware & Software	Cybersecurity Workforce	Priority Services

Table 1 - Working Group Structure

2.2 Working Group #3 Team Members

Working Group #3 consists of the members listed below.

* Indicates member, EAS Operating Handbook Update Project Team

Name	Company or Organization
Chair WG3 - Kelly Williams*	National Association of Broadcasters
Chair WG3 – Steven Johnson*	Johnson Telecom
Chair WG3 EAS Operating Handbook Update Project Team – Gary Timm*	Wisconsin EAS Broadcast Chair, WI SECC
Adrienne Abbott-Gutierrez*	Nevada EAS Chair, NV SECC
Mark Annas	Riverside (CA) Fire Department
John Archer*	SiriusXM
John E. Benedict*	CenturyLink
Benjamin Brinitzer*	iHeart Media and Society of Broadcast Engineers
Robert Bunge	NOAA NWS
Kay Chiodo	Def Link Inc.
Greg Cooke*	FCC
Edward Czarnecki*	Monroe Electronics
Jim Du Bois*	Minnesota Broadcasters Association
Clay Freinwald*	Washington State University, WA SECC
Daniel Geist*	Cox Communications, Inc.
Suzanne Goucher*	Maine Association of Broadcasters, Maine SECC
Neil Graves	SNR Systems
Ricardo Guerrero*	AT&T

Ryan Hedgpeth*	DHS OEC
Craig Hoden	NOAA NWS
Al Kenyon*	DHS FEMA
Jim Klas	Wisconsin Educational Communications Board
Wayne Luplow	LGE/Zenith Electronics
Lillian McDonald	Twin Cities Public Television & Emergency, Community, Health and Outreach
Brian Murray	Houston Urban Area Security Initiative's Emergency Public Information Work Group
Dan O'Callaghan*	Verizon
Brian Oliger	Hubbard Radio
Jerry Parkins*	Comcast
Harold Price*	Sage Alerting Systems, Inc.
Austin Randazzo	FCC
Richard Rudman*	Broadcast Warning Working Group, CA SECC
Francisco Sanchez	Harris County Office of Homeland Security & Emergency Management
Bill Schully	DIRECTV
Andy Scott*	National Cable & Telecommunications Association
Gary Smith*	Cherry Creek Radio
Matthew Straeb	GSS Net
Mike Talbert*	Verizon
Leo Velazquez	AT&T
Larry Walke	National Association of Broadcasters
Herb White*	NOAA NWS (contract support)

Table 2 - List of Working Group Members

3 Objective, Scope, and Methodology

3.1 Objective

The working group has been tasked to “analyze the manner in which the EAS should operate for each type of EAS Participant (e.g., broadcaster and cable service provider facilities) and shall make recommendations for textual and visual elements of a handbook suitable for each category of EAS Participant, with particular attention to be given to rural, smaller and less resourced EAS Participants.”

3.2 Scope

This document addresses the deliverables outlined in the CSRIC V charter for Working Group #3. The working group endeavored to develop an updated EAS Operating Handbook suitable for use by all categories of EAS Participants, as well as craft the instructions for completing the customizable blank portions of the Handbook.

The Project Team took the following EAS Participant categories into consideration regarding the development of the updated EAS Operating Handbook:

- Radio Broadcasters
- TV Broadcasters

- Cable TV Providers
- Satellite Radio Providers
- Satellite TV Providers
- Wireline/IPTV Providers

The Project Team took the following logistical/technical factors into consideration regarding the development of the updated EAS Operating Handbook:

- Attended vs. Unattended operation
- Automatic vs. Manual mode operation
- Mixed use of Automatic mode part of the time and Manual mode at other times
- Operation as a decoder-only broadcast station
- Corporate vs. local facility oversight
- Variations in EAS equipment operation
- The differences between typical facilities in the various EAS Participant groups

The Project Team devoted particular attention to the needs of rural, smaller and less resourced EAS Participants, resulting in the following considerations:

- Assessing the effect of all the factors above on these less resourced EAS Participants
- Designing a straight-forward and simple updated EAS Operating Handbook
- Including background information in the Instructions document
- Recommending that the FCC develop an EAS Participant Guide based on our suggested content in Appendix C, a resource that could be of great benefit to these facilities
- Highlighting that the FCC needs to adopt a new rule to instruct decoder-only stations on the action they are to take when receiving an EAN or NPT
- Recommending that the Commission encourage EAS equipment manufacturers to provide guidance to their users on implementing the various choices discussed in the Handbook and its associated Instructions, another resource that could be of great benefit to these facilities

Finally, although not specifically in the Working Group 3 description, the Project Team endeavored to address any issues that were a logical extension of our work in updating the EAS Operating Handbook. This analysis led to recommendations for an EAS Participant Guide, and a list of EAS rules identified as needing update.

3.3 Methodology

The Project Team used a collaborative, inclusive approach. Given the expertise of various team members, it was important to provide an open forum through which participants could express their opinions and help shape this report. These discussions largely took place during a series of weekly conference calls moderated by the Project Team chair, Gary Timm, Broadcast Chair of the Wisconsin State Emergency Communications Committee.

4 Background

The current FCC EAS Operating Handbooks have not been updated since 2007. In the Working Group 3 description, the Commission notes “the current Handbook is obsolete and contains inaccurate instructions”.

An important focus of the EAS Operating Handbook is to provide guidance for EAS Participants to relay the Presidential Emergency Action Notification (EAN) message. In 2012, the EAS Fifth Report and Order¹ fundamentally changed the way the Presidential message is transmitted. First, the Emergency Action Termination (EAT) alert was eliminated. Secondly, the FCC implemented what it calls “message-by-message processing” where the Presidential message follows the same sequence as all other EAS alerts; an initial EAS code, in this case EAN, followed by the audio message and terminated by an End-of-Message (EOM) code. Any further broadcasts would repeat this sequence. The Commission notes in this Order, “We conclude that revising the rules governing EAN processing is necessary because they were designed to accommodate the EAN Network, which was phased out in 1995, and purely manual operation.” The FCC thus revised section §11.54 of the EAS rules. These changes made the instructions in the current Handbooks obsolete.

5 Recommendations

WG3 makes the following recommendations to the Commission, detailed in this section and summarized in the Conclusions section.

The Project Team developed four deliverables, presented as appendices to this report:

- Appendix A: CSRIC Recommendation for updated EAS Operating Handbook
- Appendix B: Instructions for Completing Customizable Sections in new Handbook
- Appendix C: Suggested Content of an EAS Participant Guide
- Appendix D: EAS Rules Identified as Needing Update

CSRIC Recommendation for updated EAS Operating Handbook: This was our Project Team’s primary mission. We determined that most of the material in the current Handbooks needed to be updated, so the decision was made to start clean with a new, simpler document. After careful analysis, we felt we would be able to replace the current set of five separate EAS Operating Handbooks (one for each EAS Participant category – Radio, TV, Cable TV, Satellite and Wireline), with just a single version for use by all EAS Participants. We accomplished this goal by employing the use of checkboxes and fill-in-the-blank operational steps for each EAS Participant facility to customize the Handbook to describe its particular implementation of EAS alerting. Examples demonstrating the flexibility of this strategy include the ability to describe:

- Attended vs. Unattended operation
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- Operation as a decoder-only broadcast station
- The differences between typical facilities in the various EAS Participant groups
- Variations in EAS equipment operation
- Variations in the desired recovery procedures at each EAS Participant facility when problems with alerts are encountered

As an additional requirement to facilitate the use of a single version of the updated EAS

¹ *Emergency Alert System Fifth Report and Order*, FCC 12-7, EB Docket 04-296 (Jan. 10, 2012) See Paragraphs 201-206.

Operating Handbook by all EAS Participants, we identified the need for a generic description of the person responsible for EAS applicable at any EAS Participant facility. At broadcast stations, the FCC rules establish the Chief Operator as responsible for EAS operations, but there is no such position established in the FCC rules for other EAS Participants. Thus we created the term “designated individual responsible for EAS operations and compliance at each EAS Participant facility” in order to keep the EAS Operating Handbook generic for use by all EAS Participants.

As a final criterion, we concluded that the EAS Operating Handbook should be written to the operator on duty to give that person the information needed to handle the FCC-required EAS alerts. To maintain this focus, we eliminated any superfluous details that are not needed by the operator on duty to relay or originate the alerts required in the EAS rules. This resulted in a very clean and straightforward updated Handbook. We strongly recommend that no other content be added to the Handbook. To address the more general EAS details not needed by the operator on duty in the EAS Operating Handbook, we suggest below that the Commission consider developing a separate EAS Participant Guide based on the topic list we provide.

Instructions for Completing Customizable Sections in new EAS Operating Handbook: Our recommended, updated EAS Operating Handbook contains a combination of checkboxes and fill-in-the-blank operational steps to allow each EAS Participant facility to customize the Handbook to describe its particular implementation of EAS alerting. It is our intent that these blank sections be completed by the designated individual responsible for EAS operations and compliance at each EAS Participant facility. In order to assist that individual in understanding the intent of each blank section, our Project Team drafted a set of instructions. These instructions should be posted on the FCC website, along with the EAS Operating Handbook.

Suggested Content of an EAS Participant Guide: Acknowledging that the EAS Operating Handbook is specifically written to the operator on duty to determine the steps necessary to relay or originate the alerts required in the EAS rules, our Project Team felt that an additional document aimed at the designated individual responsible for EAS operations and compliance at each EAS Participant facility may be of benefit for the Commission to highlight EAS details needed by this EAS responsible individual but not needed by the operator on duty in the EAS Operating Handbook. We suggest the title EAS Participant Guide, and in this report present in outline form a list of the proposed topics for this Guide.

EAS Rules Identified as Needing Update: Our final deliverable is a list of issues in the EAS rules discovered while drafting the updated EAS Operating Handbook. We recommend that the FCC consider updating those rules to remove obsolete concepts and clear up ambiguities.

In addition to the four deliverables, the Project Team adopted the following recommendation:

Support from Manufacturers: Our Project Team recommends that the FCC encourage each EAS equipment manufacturer to define for its users how to implement the various choices discussed in the Handbook and its associated Instructions. The guidance should clearly reference each task in the Handbook, and provide help and understanding about how to accomplish each task with that manufacturer’s equipment, either by reference to existing documentation or with new documentation, using the particular manufacturer’s terms and technologies.

6 Conclusions

The EAS Operating Handbook Project Team succeeded in developing an updated EAS Operating Handbook and Instructions, following the Project Team's preference for a single version for use by all EAS Participants. As a matter of course in drafting the updated Handbook, the Project Team research revealed that two additional limited-scope deliverables would be of value to the Commission. Thus we developed in outline form a list of topics for a recommended EAS Participant Guide, as well as collected a list of EAS rules identified as needing update in connection with the topics addressed in the updated Handbook. Finally, we concluded that EAS Participants would benefit from guidance provided by their EAS equipment manufacturers.

To summarize, WG3 recommends that the FCC should:

- (1) Adopt the updated EAS Operating Handbook presented in this report as Appendix A.
- (2) Adopt the Instructions for completing the customizable sections in the new Handbook, presented in this report as Appendix B.
- (3) Develop an EAS Participant Guide, following the suggested content outlined in this report as Appendix C.
- (4) Consider amending the EAS rules identified as needing update in Appendix D of this report.
- (5) Encourage EAS equipment manufacturers to define for their users how to implement the various choices discussed in the Handbook and its associated Instructions.

A. Appendix A: CSRIC Recommendation for updated EAS Operating Handbook

The document presented here in Appendix A is the recommendation of WG3 as the updated EAS Operating Handbook. It is intended as a single version of the Handbook, written to enable use by all EAS Participant categories. In order to accommodate the different types of EAS Participants and the operational variations within each EAS Participant group, the Handbook contains customizable blank sections to be filled in by the designated individual responsible for EAS operations and compliance at each EAS Participant facility. Appendix B of this report contains the Instructions drafted by WG3 to aid in the completion of the blank sections of the Handbook.

The Project Team concluded that the EAS Operating Handbook should be written to the operator on duty to give that person the information needed to handle the FCC-required EAS alerts. To maintain this focus, we eliminated any superfluous details that are not needed by the operator on duty to relay or originate the alerts required in the EAS rules. This resulted in a very clean and straightforward updated Handbook. **We strongly recommend that no other content be added to the Handbook.** To address the more general EAS details not needed by the operator on duty in the EAS Operating Handbook, we suggest that the Commission consider developing a separate EAS Participant Guide based on the topic list we provide in Appendix C.

Notes:

- It is our intent to merely furnish the text of the Handbook and leave the formatting up to the Commission. However, we have the following thoughts:
 - WG3 recommends this Handbook be created in the Portrait layout, as opposed to Landscape layout, in order to easily differentiate the new, updated Handbook from the old Handbooks.
 - It occurs to us that an appropriate format may be a “fillable PDF” similar to the IRS Form 1040, where the user can complete checkboxes and blank lines and then save the PDF for future changes.
 - PDFs also typically have a feature allowing pop-up balloons to be assigned to the blank lines, which could display the instructions for completing that line when the user moves the computer mouse pointer over that particular blank line. This method could eliminate the need for a separate Instructions document altogether.
- On the second page of this Handbook quoting rule §11.15, we eliminated the words “the EAT” and we dropped the second half of the last sentence from the current rule. In Appendix D of this report, we recommend that the Commission drop these two phrases from the current §11.15 rule.
- The FCC may need to revise this Handbook if any other changes are made to the EAS rules as a result of the issues we raise in our Appendix D, such as but not limited to, how decoder-only stations are to handle received EANs and NPTs (in §11.54), and if the required RWT can be relayed or must be originated (in §11.61).
- Although the Handbook we created contains only three steps for each manual procedure list, we anticipate some facilities may require more than three steps. By listing only three steps, we did not intend to imply that we feel only three steps are needed in any given facility. Rather, we leave it to the Commission to determine the number of blank steps it wishes to offer in each manual procedure. If the Commission could find a mechanism for the user to dynamically add steps as needed, this would provide the optimal flexibility for all facilities.



2016 EAS Operating Handbook

IMPORTANT *EDITING INSTRUCTIONS*: Prior to posting, the individual responsible for EAS operations at this facility must complete the blank sections of this Handbook. Consult the companion EAS Operating Handbook Instructions, as well as information from the manufacturer of your EAS device, and your State or Local EAS Plan, for guidance in completing the blank sections of this Handbook.

Operators with EAS questions or issues should contact the following individual responsible for EAS operations at this facility:

Name: _____

Contact Information: _____

Post at All EAS Operator Locations

[Inside front cover note]

The EAS Operating Handbook states in summary form the actions to be taken by personnel at EAS Participant facilities upon receipt of an EAN, tests, or State and Local Area alerts. It is issued by the FCC and contains instructions for the above situations. A copy of the Handbook must be located at normal duty positions or EAS equipment locations.

47 CFR Part 11, §11.15 EAS Operating Handbook.

INTRODUCTION

This Handbook is a guide for use by operations personnel who are on duty when EAS alerts are originated, received, and possibly relayed.

Guidance in this Handbook

This Handbook provides guidance on:

- National-level EAS Alert
 - This alert uses the Emergency Action Notification (EAN) event code.
- National EAS Test
 - This test uses the National Periodic Test (NPT) event code.
- Monthly EAS Test
 - This test uses the Required Monthly Test (RMT) event code.
- Weekly EAS Test
 - This test uses the Required Weekly Test (RWT) event code.
- State and Local EAS Alerts
 - These alerts use all other event codes.

NATIONAL-LEVEL EAS ALERT

EAS Event Code: Emergency Action Notification (EAN)

All facilities are required to immediately relay the Emergency Action Notification (EAN).

The EAN is received by our EAS unit from sources outside our facility. It is generated by Federal officials.

What do I need to do if I am the operator on duty?

At this facility, EANs are relayed automatically, with no operator intervention.

- OR -

At this facility, the operator on duty is required to perform the following steps to relay an EAN:

- Step 1: _____.
- Step 2: _____.
- Step 3: _____.
- Alert will finish by itself.

What does the EAN sound like?

The EAN begins with three long EAS data bursts, followed by the 8-second attention signal, then the President or

other authorized Federal official will speak for as long as necessary. There is no time limit to the EAN alert. The EAN will end with three short EAS data bursts.

There may be silence, or a repeating “please stand by” message during the EAN before the President or other authorized Federal official begins speaking.

? What if I am the operator on duty and have a problem?

Note in detail what happened and immediately report the issue to the individual responsible for EAS operations at this facility.

For guidance on resolving problems, see the section on Recovery Procedures at the back of this Handbook.

NATIONAL EAS TEST

EAS Event Code: National Periodic Test (NPT)

All facilities are required to immediately relay the National Periodic Test (NPT).

The National EAS Test is received by our EAS unit from sources outside our facility. It is generated by Federal officials.

What do I need to do if I am the operator on duty?

At this facility, NPTs are relayed automatically, with no operator intervention.

- OR -

At this facility, the operator on duty is required to perform the following steps to relay an NPT:

- Step 1: _____.
- Step 2: _____.
- Step 3: _____.
- Test will finish by itself.

 What does the NPT sound like?

The NPT consists of three long EAS data bursts, the 8-second attention signal, an audio message, and three short EAS data bursts. It has a built-in two minute time limit.

? What if I am the operator on duty and have a problem?

If the NPT test does not run, NEVER try to originate one yourself. Instead, note in detail what happened and report the issue to the individual responsible for EAS operations at this facility.

For guidance on resolving problems, see the section on Recovery Procedures at the back of this Handbook.

MONTHLY EAS TEST

EAS Event Code: Required Monthly Test (RMT)

SENDING THE RMT: Not all facilities originate RMTs.

This facility sometimes originates RMTs. See instructions at: _____.

- OR -

At this facility, operators should NEVER originate an RMT.

RECEIVING THE RMT: When the Monthly EAS Test is received by our EAS unit from sources outside our facility, the operator shall follow the guidance below.

What do I need to do if I am the operator on duty?

At this facility, received RMT tests are relayed automatically, with no operator intervention.

- OR -

At this facility, the operator on duty is required to perform the following steps to relay a received RMT:

- Step 1: _____.

- Step 2: _____.
- Step 3: _____.
- Test will finish by itself.

At this facility, the Required Monthly Test shall be run within __ minutes of being received by the EAS equipment.

 What does the RMT sound like?

The RMT includes three long EAS data bursts, an 8-second attention signal, an audio message, and three short EAS data bursts. It has a built-in two minute time limit.

? What if I am the operator on duty and have a problem?

If the RMT test does not run, do not try to originate one yourself. Instead, note in detail what happened and report the issue to the individual responsible for EAS operations at this facility.

For guidance on resolving problems, see the section on Recovery Procedures at the back of this Handbook.

WEEKLY EAS TEST

EAS Event Code: Required Weekly Test (RWT)

If this box is checked, our facility is exempt from originating the Required Weekly Test and all information below can be disregarded by the operator.

If the box above is not checked, all information below applies to our facility...

The EAS Required Weekly Test is originated by the EAS unit at our facility. RWT tests received from outside our facility are never relayed.

What do I need to do if I am the operator on duty?

At this facility, RWT tests are originated automatically, with no operator intervention.

- OR -

At this facility, the operator on duty is required to perform the following steps to originate an RWT:

- Step 1: _____.
- Step 2: _____.

- Step 3: _____.
- Test will finish by itself.

🔗 What does the RWT sound like?

The RWT includes three long EAS data bursts, a pause, and three short EAS data bursts. There is NO audio message within the RWT.

? What if I am the operator on duty and have a problem?

If the RWT test does not run, note in detail what happened and immediately report the issue to the individual responsible for EAS operations at this facility so the test can be rescheduled.

For guidance on resolving problems, see the section on Recovery Procedures at the back of this Handbook.

STATE AND LOCAL EAS ALERTS

EAS Event Code: These alerts use all event codes other than those on the preceding pages.

Refer to your facility's State and Local alerting guidance.

Facility Notes:

RECOVERY PROCEDURES

To resolve problems with any EAS event covered in this Handbook, consult the Recovery Procedures below.

At the conclusion of any EAS test or alert, if normal programming does not return or if you hear programming from another source, follow these steps:_____.

For issues other than the one described above, follow this procedure in the order listed:

- Step 1: _____.
- Step 2: _____.
- Step 3: _____.
- Step 4: _____.
- Step 5: _____.
- Step 6: _____.

Note in detail what happened and immediately report the issue to the individual responsible for EAS operations at this facility.

B. Appendix B: Instructions for Completing Customizable Sections in new Handbook

The recommended, updated EAS Operating Handbook contains a combination of checkboxes and fill-in-the-blank operational steps to allow each EAS Participant facility to customize the Handbook to describe its particular implementation of EAS alerting. It is the intent of WG3 that these blank sections be completed by the designated individual responsible for EAS operations and compliance at each EAS Participant facility. In order to assist that individual in understanding the intent of each blank section, WG3 offers the following set of instructions. These instructions should be posted on the FCC website, along with the EAS Operating Handbook.

Notes:

- The arrows and highlighting in the layout of this document are merely intended for WG3 to communicate to the FCC the instructions we intend to go with each blank checkbox and blank line. The layout WG3 used is not necessarily our recommendation for a format. We leave it to the Commission to determine whether our arrows, highlighting and side columns of text are an appropriate layout for this document.
- While it is our intent to merely furnish the text of these Handbook Instructions and leave the text formatting up to the Commission, it occurs to us that if a format such as a “fillable PDF” were used for the Handbook, it may be possible to assign PDF pop-up balloons to the blank lines, which could display the instructions for completing that line when the user moves the computer mouse pointer over that particular blank line. This method may then eliminate the need for a separate Instructions document altogether.
- WG3 suggests these Instructions be an online document, with the cited EAS rules as clickable links.
- The FCC may need to revise these Handbook Instructions if any changes are made to the EAS rules as a result of the issues we raise in our Appendix D, such as but not limited to, how decoder-only stations are to handle received EANs and NPTs (in §11.54), and if the required RWT can be relayed or must be originated (in §11.61).



INSTRUCTIONS FOR 2016 EAS Operating Handbook

IMPORTANT: These Instructions are for use by the designated individual responsible for EAS operations and compliance at your facility. Check with your manager or supervisor if you are uncertain regarding your authority to use these Instructions to complete the FCC-required EAS Operating Handbook information.

Instructions for Completing Blank Sections in the FCC EAS Operating Handbook by the Designated Individual Responsible for EAS Operations and Compliance at this Facility

Follow these instructions for completing the checkboxes and fill-in-the-blank fields in your EAS Operating Handbook before it is posted. Reminder: FCC rules require posting of your facility's Handbook at all EAS operating positions.

You may need to consult information from the manufacturer of your EAS device, and your State or Local EAS Plan, for guidance in completing the blank sections of this Handbook.

On the following pages, the checkboxes are utilized to indicate if your facility handles each alert-type in the Automatic mode or in the Manual mode. Manual mode means the operator on duty needs to perform steps to relay or originate the alert. Thus, the checkboxes always occur in pairs separated by the word "OR", and you should be selecting only one of the two check boxes.

Note regarding the checkboxes above: If your facility operates in Automatic part of the time and Manual at other times, it is suggested that you checkmark the Manual mode box and in Step 1 of the procedure list the hours your facility is in Automatic mode when no operator intervention is required.

The fill-in-the-blank fields are intended for you to fill in the steps that your operator on duty needs to perform if you had check-marked the box on that page indicating operator action is needed. If you check-marked the Automatic box, then these steps should be left blank.

The following instructions detail decisions to be made on each page of the EAS Operating Handbook.

Decoder-Only Exceptions

Class D non-commercial educational FM, LPFM, and LPTV stations are granted the exception in FCC rules of not being required to install an EAS Encoder. However, these stations may install an Encoder/Decoder if desired. If your facility does operate an Encoder/Decoder, then follow the instructions in this document as described. If your facility operates as decoder-only, the following exceptions can be applied.

Decoder-Only Required Monthly Test:

FCC rule 11.61(a)(1)(i) states that, “Analog and digital class D non-commercial educational FM, analog and digital LPFM stations, and analog and digital LPTV stations are required to transmit only the test script.”

In the following Instructions for RMT, Class D NCE FM, LPFM, and LPTV stations should check-mark the box indicating “operator on duty is required to perform the following steps”, and as Step 1 fill in a statement such as, “Read the following script on the air, “This is a Required Monthly Test...”, using the appropriate script for your area as found in the State EAS Plan.

Decoder-Only Required Weekly Test:

FCC rule 11.61(a)(2)(ii) states, “DBS providers, analog and digital class D non-commercial educational FM stations, analog and digital LPFM stations, and analog and digital LPTV stations are not required to transmit this test.”

In the following Instructions for RWT, if your facility operates as decoder-only, you should check-mark the box at the top of the RWT page indicating your facility is exempt from originating the RWT.

DBS Provider Exception

Note that the above exception to originating RWTs applies to your facility as well. If you choose to exercise this option, you should check-mark the box at the top of the RWT page indicating your facility is exempt from originating the RWT.

Instructions for EAS Operating Handbook – Page 1 - Cover

CHECKBOX CHOICES

(There are no checkbox choices on this page.)



2016 EAS Operating Handbook

IMPORTANT *EDITING INSTRUCTIONS*: Prior to posting, the individual responsible for EAS operations at this facility must complete the blank sections of this Handbook. Consult the companion EAS Operating Handbook Instructions, as well as information from the manufacturer of your EAS device, and your State or Local EAS Plan, for guidance in completing the blank sections of this Handbook.

Operators with EAS questions or issues should contact the following individual responsible for EAS operations at this facility:

Name:
Contact Information:

Post at All EAS Operator Locations

FILL-IN-THE-BLANK CHOICES

Fill in the name of individual whom your operators should contact with EAS questions or issues.

Fill in that individual's email or phone contact information.

Information to Consider in Completing the Blanks for EAS Operating Handbook – Page 4 - EAN

- FCC rules require that this alert be relayed immediately, whether your EAS unit is in Automatic or Manual mode operation.
- Your EAS unit should be programmed to react to an EAN containing the National location code, and other location codes as required.

See instructions on next page for completing the blank sections of this page.

Instructions for EAS Operating Handbook – Page 4 - EAN

CHECKBOX CHOICES

If this facility relays the EAN alert in Automatic mode, then check-mark the first box.



- OR -



If this facility requires the operator on duty to perform steps to relay the EAN alert, then check-mark the second box.

NATIONAL-LEVEL EAS ALERT

EAS Event Code: Emergency Action Notification (EAN)

All facilities are required to immediately relay the Emergency Action Notification (EAN).

The EAN is received by our EAS unit from sources outside our facility. It is generated by Federal officials.

What do I need to do if I am the operator on duty?

At this facility, EANs are relayed automatically, with no operator intervention.

- OR -

At this facility, the operator on duty is required to perform the following steps to relay an EAN:

- Step 1: _____.
- Step 2: _____.
- Step 3: _____.
- Alert will finish by itself.



What does the EAN sound like?

The EAN begins with three long EAS data bursts, followed by the 8-second attention signal, then the President or

FILL-IN-THE-BLANK CHOICES

If you check-marked the first box on the left indicating Automatic mode is used, then the following steps are left blank.

If you check-marked the second box on the left indicating operator action is necessary, then fill in the required steps here.

Information to Consider in Completing the Blanks for EAS Operating Handbook – Page 6 - NPT

- FCC rules require that this test be relayed immediately, whether your EAS unit is in Automatic or Manual mode operation.
- Your EAS unit should be programmed to react to an NPT containing the National location code, and other location codes as required.
- Provide NPT data collection instructions for the operator on duty if necessitated by the Electronic Test Reporting System (ETRS) reporting requirements.

See instructions on next page for completing the blank sections of this page.

Instructions for EAS Operating Handbook – Page 6 - NPT

CHECKBOX CHOICES

If this facility relays the NPT test in Automatic mode, then check-mark the first box.

- OR -

If this facility requires the operator on duty to perform steps to relay the NPT test, then check-mark the second box.

NATIONAL EAS TEST

EAS Event Code: National Periodic Test (NPT)

All facilities are required to immediately relay the National Periodic Test (NPT).

The National EAS Test is received by our EAS unit from sources outside our facility. It is generated by Federal officials.

What do I need to do if I am the operator on duty?

At this facility, NPTs are relayed automatically, with no operator intervention.

- OR -

At this facility, the operator on duty is required to perform the following steps to relay an NPT:

- Step 1: _____.
- Step 2: _____.
- Step 3: _____.
- Test will finish by itself.

What does the NPT sound like?

Page 6 of 13

FILL-IN-THE-BLANK CHOICES

If you check-marked the first box on the left indicating Automatic mode is used, then the following steps are left blank.

If you check-marked the second box on the left indicating operator action is necessary, then fill in the required steps here.

Information to Consider in Completing the Blanks for EAS Operating Handbook – Pages 8 & 9 - RMT

- FCC rules require that this test be relayed within 60 minutes, with the following exceptions:
 - See FCC rule 11.61(a) for circumstances when the RMT need not be relayed.
 - Class D NCE FM, LPFM, and LPTV stations see Page 4 of these Instructions for exceptions.
- The RMT test may be relayed automatically or manually.
- EAS Local Primary (LP) stations should not wait the full 60 minutes, to give downstream stations time to relay the RMT.
- Your EAS unit should be programmed to react to the RMT location codes as set forth in applicable State EAS Plans.
- The RMT originator and schedule should be listed in the applicable State EAS Plans.

See instructions on next page for completing the blank sections of this page.

Instructions for EAS Operating Handbook – Pages 8&9 - RMT

<p>If this facility originates the RMT test, then check-mark the first box.</p> <p>- OR -</p> <p>If this facility never originates RMTs, then check-mark the second box.</p> <p>If this facility relays the RMT test in Automatic mode, then check-mark the first box.</p> <p>- OR -</p> <p>If this facility requires the operator on duty to perform steps to relay the RMT test, then check-mark the second box.</p> <p>CHECKBOX CHOICES</p>	<p>MONTHLY EAS TEST</p> <p>EAS Event Code: Required Monthly Test (RMT)</p> <p><u>SENDING THE RMT:</u> Not all facilities originate RMTs.</p> <p><input type="checkbox"/> This facility sometimes originates RMTs. See instructions at: <input type="text"/>.</p> <p>- OR -</p> <p><input type="checkbox"/> At this facility, operators should NEVER originate an RMT.</p> <p><u>RECEIVING THE RMT:</u> When the Monthly EAS Test is received by our EAS unit from sources outside our facility, the operator shall follow the guidance below.</p> <p><u>What do I need to do if I am the operator on duty?</u></p> <p><input type="checkbox"/> At this facility, received RMT tests are relayed automatically, with no operator intervention.</p> <p>- OR -</p> <p><input type="checkbox"/> At this facility, the operator on duty is required to perform the following steps to relay a received RMT:</p> <ul style="list-style-type: none">• Step 1: <input type="text"/>.	<p>FILL-IN-THE-BLANK CHOICES</p> <p>If you check-marked the first box on the left, then fill in location of instructions here.</p> <p>If you check-marked the first box on the left indicating Automatic mode is used, then these steps are left blank.</p> <p>If you check-marked the second box on the left indicating operator action is necessary, then fill in the required steps here.</p>
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Instructions for EAS Operating Handbook – Pages 8&9 – RMT (continued)

CHECKBOX CHOICES

(There are no checkbox choices on this page.)

- Step 2:
- Step 3:
- Test will finish by itself.

At this facility, the Required Monthly Test shall be run within minutes of being received by the EAS equipment.

🔊 What does the RMT sound like?

The RMT includes three long EAS data bursts, an 8-second attention signal, an audio message, and three short EAS data bursts. It has a built-in two minute time limit.

? What if I am the operator on duty and have a problem?

If the RMT test does not run, do not try to originate one yourself. Instead, note in detail what happened and report the issue to the individual responsible for EAS operations at this facility.

For guidance on resolving problems, see the section on Recovery Procedures at the back of this Handbook.

Continue steps from previous page.

Fill in the amount of delay that is policy of this facility, but in no case more than 60 minutes.

FILL-IN-THE-
BLANK
CHOICES

Information to Consider in Completing the Blanks for EAS Operating Handbook – Page 10 - RWT

- FCC rule 11.61(a)(2)(i) requires that EAS Participants must send an RWT “at least once a week at random days and times”, with the following exceptions:
 - See FCC rule 11.61(a) for circumstances when the RWT need not be originated.
 - DBS Providers, and Class D NCE FM, LPFM, and LPTV stations, see Page 5 of these Instructions for exceptions.
- FCC rule 11.51(m) states, “When transmitting the required weekly test, EAS Participants shall use the event code RWT. The location codes are the state and county for the broadcast station city of license or system community or city. Other location codes may be included upon approval of station or system management.”
- FCC rule 11.61(a)(2)(iv) states that, “EAS Participants are not required to transmit a video message when transmitting the required weekly test.”
- The RWT test may be transmitted automatically or manually.
- The transmitted RWT may have an announcement before or after the test, but it is not required.

See instructions on next page for completing the blank sections of this page.

Instructions for EAS Operating Handbook – Page 10 - RWT

CHECKBOX CHOICES	WEEKLY EAS TEST	FILL-IN-THE-BLANK CHOICES
<p>Decoder-only facility, check this box. DBS facility might check this box. See Page 5 of these Instructions.</p> <p>If this facility originates the RWT in Automatic mode, then check-mark the first box.</p> <p>- OR -</p> <p>If this facility requires the operator on duty to perform steps to originate the RWT test, then check-mark the second box.</p>	<p>EAS Event Code: Required Weekly Test (RWT)</p> <p><input type="checkbox"/> If this box is checked, our facility is exempt from originating the Required Weekly Test and all information below can be disregarded by the operator.</p> <p>If the box above is not checked, all information below applies to our facility...</p> <p>The EAS Required Weekly Test is originated by the EAS unit at our facility. RWT tests received from outside our facility are never relayed.</p> <p><u>What do I need to do if I am the operator on duty?</u></p> <p><input type="checkbox"/> At this facility, RWT tests are originated automatically, with no operator intervention.</p> <p>- OR -</p> <p><input type="checkbox"/> At this facility, the operator on duty is required to perform the following steps to originate an RWT:</p> <ul style="list-style-type: none">• Step 1: <input type="text"/>• Step 2: <input type="text"/>	<p>If you check-marked the first box on the left indicating Automatic mode is used, then the following steps are left blank.</p> <p>If you check-marked the second box on the left indicating operator action is necessary, then fill in the required steps here.</p>

Information to Consider in Completing the Blanks for EAS Operating Handbook – Page 12 – State and Local EAS Alerts

- You may need to consult information found in your State or Local EAS Plan for guidance in completing the blanks in this section of this Handbook.
- All State and Local alerts are at the EAS Participant's discretion. See FCC rule 11.52 for details.
- However, if an EAS Participant chooses to carry those alerts then FCC rules state that the procedures in the State or Local EAS Plan must be followed. See FCC rule 11.55 for details.
- State or Local EAS alerts can be relayed in the Automatic or Manual mode.

See instructions on next page for completing the blank sections of this page.

Instructions for EAS Operating Handbook – Page 12 – State and Local EAS Alerts

CHECKBOX CHOICES

(There are
no checkbox
choices on
this page.)

STATE AND LOCAL EAS ALERTS

EAS Event Code: These alerts use all event codes
other than those on the preceding pages.

Refer to your facility's State and Local alerting guidance.

Facility Notes:



FILL-IN-THE- BLANK CHOICES

Fill in the
location of
your
facility's
State and
Local
alerting
guidance, or
a statement
on your
facility
policy, or
other
instructions
for your
operator on
duty.



Information to Consider in Completing the Blanks for EAS Operating Handbook – Page 13 – Recovery Procedures

Each of the four alerts and tests covered in this Handbook ends with a section entitled “What if I am the operator on duty and have a problem?” The last response in each of these sections is, “For guidance on resolving problems, see the section on Recovery Procedures at the back of this Handbook.”

Thus, the following section is your opportunity to provide your operators with the precise steps you want them to follow in resolving any issues.

See instructions on next page for completing the blank sections of this page.

Instructions for EAS Operating Handbook – Page 13 – Recovery Procedures

CHECKBOX CHOICES

(There are no checkbox choices on this page.)

RECOVERY PROCEDURES

To resolve problems with any EAS event covered in this Handbook, consult the Recovery Procedures below.

At the conclusion of any EAS test or alert, if normal programming does not return or if you hear programming from another source, follow these steps: .

For issues other than the one described above, follow this procedure in the order listed:

- Step 1: .
- Step 2: .
- Step 3: .
- Step 4: .
- Step 5: .
- Step 6: .

Note in detail what happened and immediately report the issue to the individual responsible for EAS operations at this facility.

FILL-IN-THE-BLANK CHOICES

Fill in the steps you want your operators to follow if an alert or test ends abnormally.

Fill in the steps you want your operators to follow if the above guidance does not resolve the situation.

C. Appendix C: Suggested Content of an EAS Participant Guide

Acknowledging that the EAS Operating Handbook is specifically written to the operator on duty to determine the steps necessary to relay or originate the alerts required in the EAS rules, our Project Team felt that an additional document aimed at the designated individual responsible for EAS operations and compliance at each EAS Participant facility may be of benefit for the Commission to highlight EAS details needed by this EAS responsible individual but not needed by the operator on duty in the EAS Operating Handbook. We suggest the title EAS Participant Guide, and in this Appendix C present in outline form a list of the proposed topics for this Guide.

Notes:

- WG3 feels that this Guide is likely to be a “book” when considering the depth of its content. As such, we felt that creating an entire book goes beyond our expertise, and should be left to a “tech writer” at the FCC. Thus we limited our deliverable to an outline of the topics we see as beneficial in this Guide, leaving the actual layout and composition to a professional tech writer at the FCC.
- While we outline a section addressing the required entry of data into the ETRS, further details will likely arise as the FCC more fully develops the ETRS entry fields. We trust that the Commission will supplement that section with whatever pertinent details come to light as ETRS is rolled out.
- Although we noted the FCC Broadcast Self-Inspection Checklists as a resource in this Guide, we note that FCC needs to update these Checklists, as they date from 2008-2010.
- The FCC may need to revise this Guide if any changes are made to the EAS rules as a result of the issues we raise in our Appendix D, such as but not limited to, how decoder-only stations are to handle received EANs and NPTs (in §11.54), and if the required RWT can be relayed or must be originated (in §11.61).
- WG3 suggests that this EAS Participant Guide would be useful to Alternative Broadcast Inspection Program (ABIP) inspectors.

EAS Participant Guide - Topic List

A deliverable of the CSRIC V – WG3, EAS Handbook Project Team

Audience:

This Guide is aimed at the designated individual responsible for EAS operations and compliance at all EAS Participant facilities. (As opposed to the posted EAS Operating Handbook, which is aimed at the operator on duty solely to determine the steps necessary to relay or originate the alerts required in the EAS rules.)

Purpose:

To highlight the more pertinent details of the EAS rules, particularly regarding required actions and items associated with the EAN, NPT, RMT, RWT, and State/Local alerting topics only dealt with at the operator level in the EAS Operating Handbook.

Format:

This Guide is intended as a single version, for use by all EAS Participants.

Suggested Topic Areas:

EAS Participant Facility-Specific Details:

- Blank lines to fill in the EAS Monitoring Assignments required in the State EAS Plan.
 - (blank checkbox) This facility has a waiver to monitor the sources above.
 - Blank lines to fill in Waiver Issue Date, and Waiver Issued By, if applicable.
- Blank lines to fill in any additional, voluntary EAS sources monitored.
- Blank lines to fill in facility management decisions on what alerts to carry and relay timing.
- Blank lines to fill in other Waivers this facility has been granted (i.e., EAS Internet access waiver).

EAS Responsible Individual:

- Broadcasters are required by FCC rules to designate a station Chief Operator, whose duties include EAS operations and compliance. (See FCC rules §73.1870 and §73.1820)
- Cable, Satellite, DBS, and Wireline: Although not required in FCC rules, if a “designated individual responsible for EAS operations and compliance” hasn’t been identified, best practices suggest that each EAS Participant facility appoint one.

EAS Security Best Practices:

A checklist of EAS security best practices for EAS Participants was recommended in a May 2014 Report by the CSRIC IV - WG3, EAS Security Subcommittee. See the Resources section of this Guide for a URL to the full report.

Electronic Test Reporting System (ETRS)

- Following an NPT test, all EAS Participants must enter their test results into the FCC Electronic Test Reporting System (ETRS). Day of Test information must be entered within 24 hours of the test, and Detailed Post-Test Data must be entered within 45 days of the test. (See FCC rule §11.61(a)(3))
- The FCC will need to update this document with the requirements for entering initial ETRS data, once those requirements are established by the Commission.

EAS Participant-Specific EAS Rules:

The following broadcast stations are not required to comply with the Part 11 EAS rules. See FCC EAS rule §11.11(b) for specifics:

- LPTV Translator Stations
- FM Broadcast Booster Stations
- FM Translator Stations
- Satellite or Repeater Broadcast Stations

The following broadcast stations are exempt from EAS encoding requirements. They must have an EAS Decoder, and may have an EAS Encoder, if desired. See FCC EAS rules §11.11(b) and §11.51(e) for specifics:

- Class D non-commercial educational FM Stations
- LPFM Stations
- LPTV Stations

Class D NCE FM Stations, LPFM Stations, and LPTV Stations are exempt from certain EAS test procedures:

- These stations are not required to transmit the Required Weekly Test (RWT). See FCC rule §11.61(a)(2)(ii).
- When receiving a Required Monthly Test (RMT), these stations are only required to rebroadcast the script of the RMT. See FCC rule §11.11(a)(1)(i).

DBS Providers are exempt from the following EAS test procedure:

- These facilities are not required to transmit the Required Weekly Test (RWT). See FCC rule §11.61(a)(2)(ii).

There are separate FCC Self-Inspection Checklists for some of these EAS Participant categories. See the Resources section of this Guide for the URL to these Self-Inspection Checklists.

Resources:

- CSRIC IV – WG3, EAS Security Subcommittee, May 2014 Initial Report on EAS Security Best Practices (https://transition.fcc.gov/pshs/advisory/csric4/CSRIC_IV_WG3-EAS_SECURITY_INITIAL_REPORT_062014.pdf)
- FCC State EAS Plans and State EAS Chairs webpage (<https://www.fcc.gov/public-safety-and-homeland-security/policy-and-licensing-division/alerting/general/state-eas-plans>)
- FCC EAS Operating Handbook (found on FCC EAS homepage: <https://www.fcc.gov/general/emergency-alert-system-eas>)
- FCC Broadcast Self-Inspection Checklist webpage (<https://www.fcc.gov/general/broadcast-self-inspection-checklists>)
 - There are separate booklets for: AM, FM, TV, Class A TV, FM Translator, LPFM, and LPTV/TV Translator/TV Booster.
 - NOTE TO FCC: The FCC needs to update these Self-Inspection Checklists...
 - They are old (2008-2010) and do not reference NPT, DTV, etc.
 - They are broadcast-only, and do not address cable TV or other EAS Participants.
- FEMA EAS Best Practices Guide webpage (http://www.fema.gov/media-library-data/20130726-1839-25045-9302/eas_best_practices_guide.pdf)

- Has EAS background, Installation and Configuration Checklist and best practices, sample installation and configuration diagrams, Glossary of Terms, and device-specific programming. (33 pages)

Programming EAS Unit:

- Your EAS unit should be programmed to immediately relay an Emergency Action Notification (EAN) containing the National location code (000000), and other location codes as required.
- Your EAS unit should be programmed to immediately relay a National Periodic Test (NPT) containing the National location code (000000), and other location codes as required.
- Your EAS unit should be programmed to react to the Required Monthly Test (RMT) location codes as set forth in applicable State EAS Plans.
- When programming your EAS unit to transmit the Required Weekly Test (RWT), the location codes to include are the state and county for the broadcast station city of license or system community or city. Other location codes may be included upon approval of station or system management.
- See guidance on your EAS equipment manufacturer's website for additional information on programming and operating your EAS unit.

Further Guidance on Alerts Addressed in EAS Operating Handbook:

EAN:

- The EAN must be relayed immediately.
- The EAN can be relayed in either Automatic or Manual mode operation.
- If a facility does not program its EAS unit for automatic relay of the EAN, those facilities are advised to ensure they have a process to relay an EAN without delay.
- The EAN must be documented in the EAS Participant's EAS Log or records according to facility policy.
- If an EAN is not received or relayed, EAS Participants must document in the EAS Log or records the cause of the failure and any remedies to correct the problem.

NPT:

- The NPT must be relayed immediately.
- The NPT can be relayed in either Automatic or Manual mode operation.
- If a facility does not program its EAS unit for automatic relay of the NPT, those facilities are advised to ensure they have a process to relay an NPT without delay.
- The NPT must be documented in the EAS Participant's EAS Log or records according to facility policy.
- If an NPT is not received or relayed, EAS Participants must document in the EAS Log or records the cause of the failure and any remedies to correct the problem.
- Following any NPT, the FCC requires that each EAS Participant's test results be entered into the ETRS. See section above for details on ETRS reporting requirements.

RMT:

- The RMT originator and schedule should be listed in the applicable State EAS Plan.
- The RMT must be relayed within 60 minutes of being received by the EAS equipment, with the following exceptions:

- FCC rule 11.61(a)(3)(ii) states, “A national test shall replace the required weekly and monthly tests for all EAS Participants... in the week and month in which it occurs.”
- FCC rule 11.61(a)(4) states, “The EAS may be activated for emergencies or special tests at the State or Local Area level by an EAS Participant instead of the monthly or weekly tests required in this section. To substitute for the monthly test, activation must include transmission of the EAS header codes, Attention Signal, emergency message and EOM code.”
- Class D NCE FM Stations, LPFM Stations, and LPTV Stations are only required to rebroadcast the script of the RMT. See FCC rule §11.11(a)(1)(i).
- The RMT can be relayed in either Automatic or Manual mode operation.
- The EAS equipment can be set to automatically rebroadcast the RMT as soon as it is received, rebroadcast it after a delay to allow it to run in a natural break in programming or it can be manually rebroadcast by the operator on duty.
- Local Primary (LP) sources should not wait the full 60 minutes, to give downstream stations time to relay the RMT.
- The RMT must be documented in the EAS Participant’s EAS Log or records according to facility policy.
- If an RMT is not received or relayed, EAS Participants must document in the EAS Log or records the cause of the failure and any remedies to correct the problem.

RWT:

- FCC rule 11.61(a)(2)(i) requires that EAS Participants must send an RWT “at least once a week at random days and times”, with the following exceptions:
 - FCC rule 11.61(a)(2)(iii) states, “The EAS weekly test is not required during the week that a monthly test is conducted.”
 - FCC rule 11.61(a)(3)(ii) states, “A national test shall replace the required weekly and monthly tests for all EAS Participants... in the week and month in which it occurs.”
 - FCC rule 11.61(a)(4) states, “The EAS may be activated for emergencies or special tests at the State or Local Area level by an EAS Participant instead of the monthly or weekly tests required in this section. To substitute for the weekly test... activation must include transmission of the EAS header and EOM codes.”
 - DBS Providers, and Class D NCE FM, LPFM, and LPTV stations are not required to transmit the Required Weekly Test (RWT). See FCC rule §11.61(a)(2)(ii).
- FCC rule 11.51(m) states, “When transmitting the required weekly test, EAS Participants shall use the event code RWT. The location codes are the state and county for the broadcast station city of license or system community or city. Other location codes may be included upon approval of station or system management.”
- FCC rule 11.61(a)(2)(iv) states that, “EAS Participants are not required to transmit a video message when transmitting the required weekly test.”
- The RWT can be transmitted automatically or manually.
- The transmitted RWT may have an announcement before or after the test, but it is not required.
- EAS Participants must receive an RWT each week from each of their two monitoring assignments shown in the State EAS Plan.
- The received and transmitted RWTs must be documented in the EAS Participant’s EAS Log or records according to facility policy.
- If an RWT is not received or the required RWT is not initiated, EAS Participants must document in the EAS Log or records the cause of the failure and any remedies to correct the problem.

- Received RWTs are not relayed, they are only documented in the EAS Log.
 - NOTE TO FCC: WG3 believes the above statement to be true, but is aware that some EAS Participants relay a received RWT rather than originate their own RWT each week. The FCC needs to clarify in the rules whether it is acceptable for an EAS Participant to relay an RWT to fulfill the weekly RWT rule, or if an RWT must be originated by the EAS Participant's own EAS Encoder.

State and Local EAS Alerts:

- All State and Local alerts are at the EAS Participant's discretion. FCC rule 11.52(d)(5) states, "The management of EAS Participants shall determine which header codes will automatically interrupt their programming for State and Local Area emergency situations affecting their audiences."
- However, if an EAS Participant chooses to carry those alerts then FCC rules state that the procedures in the State or Local EAS Plan must be followed. FCC rule 11.55(d)(1) states, "EAS Participants participating in the State or Local Area EAS must follow the procedures for processing such messages in the State and Local Area Plans."
- State or Local EAS alerts can be relayed in the Automatic or Manual mode.
- The transmission times of State and Local alerts must be documented in the EAS Participant's EAS Log or records according to facility policy.
- The individual responsible for EAS operations and compliance, in consultation with facility management, should develop guidance for the operator on duty to follow regarding state and local alerting. You should consult information found in the applicable State or Local EAS Plans to develop this guidance. It should then be displayed prominently at all EAS operator positions, and its location noted in the State and Local Alerts section of the EAS Operating Handbook.

WG3 further recommendations to FCC on this document:

Terminology:

- Keep terms generic:
 - Don't use broadcaster-specific terms such as Chief Engineer or Chief Operator.
 - When referring to EAS Participants, use "facility" rather than "station".
 - When referring to EAS monitoring, use "source" rather than "station".

D. Appendix D: EAS Rules Identified as Needing Update

This appendix is a list of issues in the EAS rules discovered while drafting the updated EAS Operating Handbook. We recommend that the FCC consider updating these rules to remove obsolete concepts and clear up ambiguities.

We tried to carefully match our recommendations for the Handbook and Instructions documents to the underlying Part 11 rules. While doing so, we encountered some portions of the rules that:

- Need clarification, for example, to reconcile immediate relay of a nationwide test when a local emergency message is already in progress
- Are missing guidance, such as actions to be taken by decoder-only stations during an EAN
- Contain concepts that are no longer relevant, such as manual message authentication
- Need minor clean up, such as a remaining reference to the EAT event code

We have listed all of these items in this document. We recommend the FCC review these items and make appropriate changes to Part 11 to remove rules no longer needed and to add clarity where needed to other rules.

Notes:

- It is WG3's intent in this section to merely highlight the rules we feel need Commission attention and likely revision, but in most cases we did not endeavor to draft proposed alternate language. A notes column is included in the table to explain the issue we identified with the indicated rule.
- Any changes made to the EAS rules as a result of the issues we raise in this Appendix D, such as but not limited to, how decoder-only stations are to handle received EANs and NPTs (in §11.54), and if the required RWT can be relayed or must be originated (in §11.61), will likely result in changes needed in the other deliverables of this CSRIC Report.

EAS Rules Identified as Needing Update

A deliverable of the CSRIC V – WG3, EAS Handbook Project Team

The following is a list of issues in the EAS rules discovered while drafting the updated EAS Operating Handbook. We recommend that the FCC consider updating these rules to remove obsolete concepts and clear up some ambiguities.

This Report does not address the rule amendments or any other issues proposed in the Notice of Proposed Rulemaking in PS Docket Nos. 15-94 and 15-91 (released on 1/29/2016). The observations below strictly apply to the EAS rules effective as of the Sixth EAS Report & Order, released on 6/3/2015.

EAS Part	The Current Rule:	Discussion
11.15 EAS Operating Handbook	<p>The current rule is shown in quotes. WG3’s suggested edits are shown with strikethrough text.</p> <p>“The EAS Operating Handbook states in summary form the actions to be taken by personnel at EAS Participant facilities upon receipt of an EAN, an EAT, tests, or State and Local Area alerts. It is issued by the FCC and contains instructions for the above situations. A copy of the Handbook must be located at normal duty positions or EAS equipment locations. when an operator is required to be on duty and be immediately available to staff responsible for authenticating messages and initiating actions.”</p>	<p>Drop “an EAT”. FCC eliminated event code EAT.</p> <p>WG3 recommends dropping the last half of the last sentence (see strikethrough text at left), because EAS Participant facilities are often unattended, therefore we recommend dropping the assumption that there is an operator on duty.</p> <p>Also, regarding “authenticating messages”... The line reads “staff responsible for authenticating messages”, but staff no longer manually authenticates messages as with the old red envelope.</p>
11.21 State and Local Area Plans and FCC Mapbook	In section (a), the rule refers to the “ <u>EAS</u> Test Reporting System”	All NPRMs and other references use “ <u>Electronic</u> Test Reporting System” regarding ETRS. Only the actual rules call it <u>EAS</u> Test Reporting System. FCC needs to normalize its ETRS definition.
11.61 Tests of EAS Procedures	In section (a)(3)(iv), the rule refers to the “ <u>EAS</u> Test Reporting System”.	
11.31 EAS Protocol	In section (c), the rules state, “transmission of 8 to 25 seconds of Attention Signal”.	This section should read “transmission of 8 seconds of Attention Signal”, as stated in 11.32 (a)(9)(iv).
11.31 EAS Protocol	In section (f), the table of location codes lists “All U.S.” as “00”.	“All U.S.” should be listed as “000000”. The FCC agreed in Footnote 38 of the EAS Sixth R&O, but the change was not reflected in the Federal Register version so is not in the rules.

EAS Part	The Current Rule:	Discussion
11.31 EAS Protocol	(there is no current rule)	<p>The FCC should provide a new section limiting the use of the 000000 Location Code, such as 000000 should be used only with NPT or EAN, and only in conjunction with the PEP Originator Code.</p> <p>Only a national level originator, such as FEMA, is permitted to originate alerts with the 000000 Location Code. Other EAS Participants must not originate messages with the 000000 Location Code.</p> <p>Only a national level originator, such as FEMA, is permitted to originate alerts with the EAN or NPT Event Codes. Other EAS Participants must not originate messages with those Event Codes.</p>
11.51 EAS code and Attention Signal Transmission requirements [2 instances]	In section (m)(2) and in section (n), the rules state, “or the NPT Event code in the case of a nationwide test of the EAS, must be transmitted immediately”.	In all four of these sections, there are two issues:
11.52 EAS code and Attention Signal Monitoring requirements	In section (e)(2), the rules state, “or the NPT Event code in the case of a nationwide test of the EAS, must be transmitted immediately”.	First, an NPT is not always a nationwide test. This rule should be rewritten to accommodate regional use.
11.54 EAS operation during a National Level emergency	In section (a), the rules state, “Immediately upon receipt of an EAN message, or the NPT Event code in the case of a nationwide test of the EAS”.	Second, FCC needs to clarify if “immediately” means that an NPT should abort an in-progress alert (i.e. a Tornado Warning).

EAS Part	The Current Rule:	Discussion
11.52 EAS code and Attention Signal Monitoring requirements	<p>In section (e), the rules state, “EAS Participants are required to interrupt normal programming either automatically or manually when they receive an EAS message in which the header code contains the Event codes for EAN, NPT, or RMT for their State or State/county location.”</p> <p>In section (e)(2), the rules state, “Decoders must be programmed for the EAN Event header code and the RMT and RWT Event header codes (for required monthly and weekly tests), with the appropriate accompanying State and State/county location codes.”</p>	These rules need to clarify and expand to reflect use of the National Location Code and NPT Event Code.
11.54 EAS operation during a National Level emergency [Also 11.52(m)(2) and (n), and 11.52(e)(2), in the “immediately” issue above.]	In section (a), the rules state, “Immediately upon receipt of an EAN message, or the NPT Event code..., EAS Participants must comply with the following requirements”.	Nothing in the rules state what decoder-only stations (Class D NCE FM, LPFM, & LPTV) are to do when receiving an EAN or an NPT.
11.54 EAS operation during a National Level emergency	In section (a)(1), the rules state, “Analog and digital broadcast stations may transmit their call letters and analog cable systems, digital cable systems and wireless cable systems may transmit the names of the communities they serve <u>during an EAS activation</u> . State and Local Area identifications must be given as provided in State and Local Area EAS Plans.”	<p>EAS Participants can’t transmit call letters and location “during an EAS activation”, as the EAS unit is on the air. This harkens back to manually-relayed alerts.</p> <p>This rule should be dropped.</p>

EAS Part	The Current Rule:	Discussion
11.55 EAS operation during a State or Local Area emergency	This current rule states, “(c) Immediately upon receipt of a State or Local Area EAS message that has been formatted in the EAS Protocol, EAS Participants participating in the State or Local Area EAS must do the following: (1) State Relay (SR) sources monitor the State Relay Network or follow the State EAS plan for instructions from the State Primary (SP) source. (2) Local Primary (LP) sources monitor the Local Area SR sources or follow the State EAS plan for instructions. (3) Participating National (PN) sources monitor the Local Area LP sources for instructions.”	(1), (2), and (3) here refer to the old manual monitoring of upstream stations, which is no longer the case. Assigned EAS monitoring is now done 24/7. In addition, not all states precisely follow the SP-SR-LP-PN model described in this rule. This rule should be dropped, and instead retain only the statement, “follow the State EAS Plan for instructions”.
11.55 EAS operation during a State or Local Area emergency	In section (c)(5), the rules state, “Upon completion of the State or Local Area EAS transmission procedures, resume normal programming until receipt of the cue from the SR or LP sources in your Local Area. At that time begin transmitting the common emergency message received from the above sources.”	This section refers to the old method of manually monitoring upstream stations and manually putting them on the air. All alerts are now self-contained using the “message-by-message processing” methodology. This rule should be dropped.
11.55 EAS operation during a State or Local Area emergency	In section (c)(6) regarding messages formatted in the EAS protocol, the rule states, “Resume normal operations upon conclusion of the message.”	This refers to the old manual interrupt method. The EAS EOM now returns the facility to normal operations. This rule should be dropped.
11.55 EAS operation during a State or Local Area emergency	In section (d)(3) regarding messages formatted in the CAP protocol, the rule states, “Resume normal operations upon conclusion of the message.”	This refers to the old manual interrupt method. The EAS EOM now returns the facility to normal operations. This rule should be dropped.

EAS Part	The Current Rule:	Discussion
11.61 Tests of EAS Procedures	In rule 11.61(a)(2)(i), sections (A), (B), (C), and (D) regarding the Required Weekly Test, the rules state that EAS Participants "...must conduct tests of the EAS header and EOM codes at least once a week at random days and times."	The FCC needs to clarify if the RWT must be originated on the EAS Participant's own EAS encoder, or whether a received RWT can simply be relayed to comply with this rule. WG3 is aware that some EAS Participants relay rather than originate RWTs as their interpretation of complying with this rule.
Not an FCC rule, but this issue was also discovered.	EB Broadcast Self-Inspection Checklists	The FCC needs to update not only the EAS section but the entire booklets for the EB Broadcast Self-Inspection Checklists.