

News from the Beltway

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1. FEMA IPAWS Conformance Testing Update

FEMA has restarted conformance testing of CAP EAS units, and has amended some of their test parameters, and expanded others. By March 2011, FEMA hopes to have a public list of vendors that “conform” to the FEMA IPAWS requirements. So what does this mean for broadcasters?

- All EAS/CAP units intended to connect to FEMA’s CAP-based IPAWS system must undergo this conformance testing, or go through it again if they went through the earlier process. This effectively means all CAP/EAS units. Most importantly, if an EAS/CAP unit does not “conform”, it will not be allowed to connect to the FEMA IPAWS system.
- FEMA’s conformance testing include both the IPAWS CAP profile and the EAS-CAP Industry Implementation Guidelines. FEMA has confirmed that they will be testing CAP-to-EAS conversion strictly to the requirements specified in both the IPAWS profile and ECIG Guidelines. This will likely present a major hurdle for both so-called CAP converter boxes and EAS units relying on outside devices for CAP processing.

Digital Alert Systems is happy to report the DASDEC™ is moving through this expanded second round of IPAWS testing and are looking forward to announcing the results soon.

2. FCC Works On Video Accessibility for Emergency Alerts

In response to legislation passed by Congress in 2010 (the “Twenty-First Century Communications and Video Accessibility Act”), we’re expecting the Commission to issue several orders -- in 2012-2013 -- to make communications, video programming and emergency alerts more accessible to people who are blind and visually impaired. The FCC created two new advisory committees: **The FCC Emergency Access Advisory Committee** and the **FCC Video Programming and Emergency Access Advisory Committee**. Their work will likely impact television broadcasters, cable operations and IPTV systems.

The Video Programming and Emergency Access Advisory Committee (VPEAAC) will develop recommendations - by April 2012 -- on "closed captioning of Internet programming previously captioned on television; the compatibility between video programming delivered using Internet protocol and devices capable of receiving and displaying such programming in order to facilitate access to captioning, video description and emergency information; video description and accessible emergency information on television programming delivered using Internet protocol or digital broadcast television; accessible user interfaces on video programming devices; and accessible programming guides and menus."

3. Propogating EAS Error Issues

A number of our customers and partners are asking us our views operational and regulatory issues, and it seems that some old issues are popping up again. One such example is the question of the responsibilities of EAS participants if a state relay or Local Primary station issues an alert with a wrong date and/or time. It seems there are still encoder-decoders out there from another vendor that are issuing alerts with incorrect dates and/or times. In discussions with FCC staff, the point was emphatically made to us that it is the responsibility of all EAS participants to maintain their EAS equipment in working order.

Allowing EAS equipment to send out improperly formatted messages, whether knowingly or unknowingly, may be viewed as a violation by the FCC. Unfortunately for the broadcaster, the violation is theirs, not the vendor providing the improperly configured equipment. If stations are receiving improperly formatted alerts, RMTs or RWTs, we suggest they contact the source of those messages to correct the situation. We will be posting additional findings and commentary in upcoming bulletins.

4. CAP “converter” boxes - solution or just more problems?

A number of radio and television stations are still pondering CAP “converter boxes”. Some are thinking that a CAP converter box is an easy and cheap way to check off the box for CAP compliance. However, we believe there is increasing reason for broadcasters to be wary of CAP “converter boxes”.

1. CAP converters will very likely require FCC certification. The fact that none of these devices have such certification, it is improbable they would be able to attain FCC certification by the September 2011 CAP compliance deadline. Moreover, the FCC advisory council (the Communications, Security, Reliability and Interoperability Council or “CSRIC”) advised that these CAP converters should be FCC certified and The National Association of Broadcasters, Society of Broadcast Engineers as well as other broadcast and cable organizations also filed comments with the FCC supporting these recommendations. Broadcasters using CAP converters need to understand that they may be putting themselves in a risky position of using uncertified gear to perform a core EAS activity.
2. CAP converters may not be able to attain full FEMA IPAWS conformance, meaning they may not be authorized to connect with the IPAWS network to receive national or other EAS messages from that source. Among other issues, conformance testing is likely to reveal that it is very difficult – if not impossible – for a CAP converter box to carry the new mandatory governor’s alert. This is a very large problem that CAP converters are not able to address, and could leave stations at risk of non-compliance.
3. Broadcasters should be very wary the true total cost of these CAP converter boxes. At a minimum, if the legacy EAS unit it is attached to needs repair or replacement, you may well have to buy a different CAP encoder-decoder anyway -- basically spending twice for the same result. Also, broadcasters must verify if they will need any additional hardware, such as satellite or wireless receivers. Broadcasters could end up spending hundreds, if not thousands, of extra dollars to accommodate what is basically a band-aid approach.

5. Repeat of National Emergency Alert System Test In Alaska

FEMA and local Alaska authorities are doing a repeat of a statewide test of the national-level Emergency Alert System (EAS) in Alaska on Wednesday, January 26, 2011, at 10 a.m. local time (2 p.m. EST). As with the 2010 test, Federal authorities will activate an EAN event code in Alaska, to evaluate performance of the system. We'll follow up next time with the results.