

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

Washington, DC 20554

In the Matter of	)	
	)	
Modernization of the Nation's Alerting Systems	)	PS Docket No. 25-224
	)	
Protecting the Nation's Communications Systems from Cybersecurity Threats	)	PS Docket No. 22-329
	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91
	)	
Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System	)	PS Docket No. 15-94
	)	

To: The Commission

**JOINT REPLY COMMENTS OF THE
STATE BROADCASTERS ASSOCIATIONS**

The Alabama Broadcasters Association, Alaska Broadcasters Association, Arizona Media Association, Arkansas Broadcasters Association, California Broadcasters Association, Colorado Broadcasters Association, Connecticut Broadcasters Association, Florida Association of Broadcasters, Georgia Association of Broadcasters, Hawaii Association of Broadcasters, Idaho State Broadcasters Association, Illinois Broadcasters Association, Indiana Broadcasters Association, Iowa Broadcasters Association, Kansas Association of Broadcasters, Kentucky Broadcasters Association, Louisiana Association of Broadcasters, Maine Association of Broadcasters, MD/DC/DE Broadcasters Association, Massachusetts Broadcasters Association, Michigan Association of Broadcasters, Minnesota Broadcasters Association, Mississippi

Association of Broadcasters, Missouri Broadcasters Association, Montana Broadcasters Association, Nebraska Broadcasters Association, Nevada Broadcasters Association, New Hampshire Association of Broadcasters, New Jersey Broadcasters Association, New Mexico Broadcasters Association, The New York State Broadcasters Association, Inc., North Carolina Association of Broadcasters, North Dakota Broadcasters Association, Ohio Association of Broadcasters, Oklahoma Association of Broadcasters, Oregon Association of Broadcasters, Pennsylvania Association of Broadcasters, Radio Broadcasters Association of Puerto Rico, Rhode Island Broadcasters Association, South Carolina Broadcasters Association, South Dakota Broadcasters Association, Tennessee Association of Broadcasters, Texas Association of Broadcasters, Vermont Association of Broadcasters, Virginia Association of Broadcasters, Washington State Association of Broadcasters, West Virginia Broadcasters Association, Wisconsin Broadcasters Association, and Wyoming Association of Broadcasters (collectively, the “State Associations”), by their attorneys in this matter, hereby file these Joint Reply Comments in the above-captioned proceeding.¹

The State Associations appreciate this opportunity to continue their dialogue with the Commission as it considers further modernization of the nation’s alerting systems, particularly the Emergency Alert System (“EAS”). As the State Associations have previously noted, the EAS is a highly successful public-private partnership, and broadcasters are essential partners in its operation and continued development. Broadcasters maintain the facilities and monitoring assignments through which alerts are relayed, participate in and, in many cases, lead State

¹ *Modernization of the Nation’s Alerting Systems; Protecting the Nation’s Communications Systems from Cybersecurity Threats; Wireless Emergency Alerts; Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System*, Report and Order in PS Docket Nos. 25-224 and 22-329 and Further Notice of Proposed Rulemaking in PS Docket Nos. 25-224, 15-94, and 15-91, FCC 26-38 (rel. June 29, 2026) (“Further Notice”).

Emergency Communications Committees, help develop State EAS Plans, coordinate with emergency officials, and invest in technologies that can improve emergency communications. Their operational experience should therefore inform changes to the system.²

The State Associations accordingly support a flexible approach to modernization that preserves established EAS workflows while allowing broadcasters to adopt useful new capabilities voluntarily. New technical standards should be developed in consultation with the manufacturers and standards bodies whose work will be essential to their implementation, account for the capabilities of equipment already in service, and be introduced through measured implementation processes that protect the prompt and reliable receipt and relay of alerts by EAS Participants.

I. The Commission Should Authorize Software-Based EAS as an Additional, Voluntary Option

Broadcasters operate facilities with widely varying technical architectures, staffing, and operational needs. A solution suitable for a large television group may be impractical for a single-station radio operator, and vice versa. The Commission therefore should allow each EAS Participant to choose the certified hardware- or software-based solution that best fits its operations.

In its comments, the National Association of Broadcasters (“NAB”) identifies benefits that software-based systems may offer broadcasters, including faster remote updates, easier integration with modern broadcast systems, flexible backup arrangements, and reduced dependence on purpose-built hardware.³ The State Associations support allowing broadcasters

² See Joint Reply Comments of the State Broadcasters Associations, PS Docket No. 25-224, at 3, 8-11, 13 (filed Nov. 18, 2025) (“State Associations 2025 Reply Comments”).

³ See Comments of the National Association of Broadcasters, PS Docket Nos. 25-224, 22-329, 15-91, and 15-94, at 3–7 (filed Aug. 29, 2026) (“NAB Comments”).

to realize those benefits where software-based systems fit their operations, without requiring any station to replace or discontinue use of a functioning hardware-based system.⁴

The State Associations also support the Commission’s tentative conclusion that software-based EAS should satisfy performance, security, and reliability requirements before it is marketed or used. In developing those requirements and the certification process, the Commission should draw on manufacturers’ expertise, allow reasonable latitude in designing compliant products to promote innovation, and permit routine maintenance, security patches, and other updates without recertification when they do not degrade certified performance.⁵

Lastly, the Commission should apply the existing 60-day period for repairing or replacing defective EAS equipment to software-based EAS implementations, rather than impose a 72-hour deadline that would merely discourage use of such systems. NAB and Sage Alerting Systems, Inc. (“Sage”) explain in their comments that diagnosis may require coordination among station personnel, software providers, equipment vendors, and outside engineers.⁶ The Commission might later revisit the issue with the benefit of deployment experience, but should not assume that every software-related problem can be diagnosed and corrected within 72 hours.

II. Message Authentication Should Be Improved Through a Measured Implementation Process

The Commission notes that alerts formatted using the Common Alerting Protocol (“CAP”) and distributed through the Federal Emergency Management Agency’s (“FEMA”)

⁴ See NAB Comments at 4, 8.

⁵ See Further Notice at ¶¶ 104–110; NAB Comments at 8–11; Comments of Sage Alerting Systems, Inc., PS Docket Nos. 25-224, 15-91, and 15-94, at 2–3, 9–14 (filed Aug. 31, 2026) (“Sage Comments”); Comments on Further Notice of Proposed Rulemaking of iHeartMedia, Inc., PS Docket Nos. 25-224, 15-94, and 15-91, at 5–7 (filed Aug. 31, 2026).

⁶ See Further Notice at ¶ 114; NAB Comments at 14–16; Sage Comments at 15–16.

Integrated Public Alert and Warning System (“IPAWS”) are digitally signed, while its rules permit EAS Participants to transmit unsigned CAP alerts.⁷ The State Associations agree that closing this gap can strengthen CAP alert authentication. However, the Commission should implement any new CAP digital-signature requirement through a measured process that provides clear standards and adequate implementation time, minimizes the risks of delayed relay and erroneous rejection of valid EAS messages, and ensures that an affected EAS Participant receives useful information when authentication fails.⁸ The Commission should develop those standards and procedures in close consultation with manufacturers and other technically knowledgeable parties whose practical expertise will be essential to ensuring reliable implementation.

As numerous parties explain, applying digital-signature authentication to legacy messages transmitted using the Specific Area Message Encoding (“SAME”) protocol presents questions distinct from those raised by unsigned CAP messages. The National Weather Service (“NWS”)—the source of the vast majority of EAS alerts—does not currently use digital signatures to authenticate its legacy EAS transmissions. The technical issues identified in the record, together with commenters’ differing views about the appropriate sequence and timing for addressing them, highlight the care needed to develop a workable transition for legacy-message

⁷ See Further Notice at ¶¶ 41–44; NAB Comments at 16–17; Sage Comments at 3–4; Comments of the AWARN Alliance, PS Docket Nos. 25-224, 15-94, and 15-91, at 2 (filed Aug. 28, 2026) (“AWARN Comments”).

⁸ See NAB Comments at 17 (recommending phased implementation, clear FCC or FEMA/IPAWS guidance, and actionable operator alerts and log entries when signature validation fails); Sage Comments at 3–4 (addressing the elements of a valid signature, chains of trust, and local availability of the information required to validate signatures).

authentication.⁹ Any implementation schedule should account for the NWS's current transmission practices and the capabilities of equipment already in service, and should provide manufacturers and standards bodies sufficient time to develop and test solutions. The resulting mechanism should not delay or reject valid alerts or disrupt automated relay. It also should not require broadcasters to replace functioning equipment.

The State Associations do not propose a particular protocol or timetable. Those technical judgments should be made in consultation with the NWS, FEMA, manufacturers, and standards bodies, and any resulting requirement should be tested for interoperability and operational reliability before becoming mandatory.

III. A Universal EAS Alert Identifier Requires Further Development

The Commission proposes a universal alert message ID for Wireless Emergency Alerts and asks whether an identifier also should be used in the EAS to detect and suppress duplicates.¹⁰ Commenters differ over both the extent of EAS duplication and the appropriate response.¹¹ The Commission should therefore work with FEMA, the NWS, manufacturers, and

⁹ See NAB Comments at 17–18 (noting the limited capacity of the legacy protocol, the potential for added processing to delay alerts, the capabilities of installed equipment, and the limited benefit of requiring equipment upgrades before the NWS can authenticate its legacy alerts); Sage Comments at 4–6 (describing a possible technical approach while identifying added complexity, delay, the risk of rejection if a signature frame is not received correctly, NWR interoperability concerns, and installed-equipment compatibility); AWARN Comments at 2 (supporting development of a legacy-authentication mechanism while recommending a phased transition that accounts for the NWS's continued reliance on NOAA Weather Radio and the NWR-originated SAME/EAS pathway).

¹⁰ See Further Notice at ¶¶ 51, 55.

¹¹ See NAB Comments at 18–19 (reporting that duplicate EAS alerts are not a significant problem and arise only in limited circumstances; explaining that any suppression mechanism must distinguish genuine duplicates from updates, corrections, cancellations, extensions, and other material changes; and recommending an approach driven by FEMA/IPAWS that does not create new station-side workflow or equipment complexity); Sage Comments at 6–7 (identifying

standards bodies to determine whether an identifier is needed, how it would operate across CAP and legacy paths, and how to avoid suppressing legitimate emergency updates. If it adopts an EAS identifier, the State Associations agree with NAB that FEMA/IPAWS should generate it upstream; broadcasters should not be required to generate or manage identifiers or assume new workflow or equipment complexity, which would only serve to delay the relay of alerts.

IV. Geotargeting Changes Should Preserve the Broad Reach and Simplicity of the EAS

The Commission should permit, but not require, EAS Participants to use CAP circles and polygons when assessing the geographic relevance of state and local alerts. Those coordinates can help broadcasters connect an emergency to their signal coverage, local geography, and other emergency information they are providing. They do not alter the valuable broad reach of conventional EAS, through which a single broadcast transmission can promptly reach population centers as well as rural and outlying communities throughout a station's coverage area.¹² Because their members help develop and implement State EAS Plans, the State Associations note Sage's concern that mandatory polygon-based filtering could disrupt established monitoring

a source of duplicate NWR SAME messages, explaining why an NWS CAP message may not match the corresponding legacy message, and discussing an alternative involving consistent construction and ordering of SAME location codes that would require no changes to the EAS/SAME protocols but greater effort by the NWS).

¹² See Further Notice at ¶¶ 70–71; NAB Comments at 19–21 (supporting optional consideration of CAP circles and polygons while emphasizing the broad reach of broadcast signals and conventional EAS).

assignments by preventing an alert from reaching a downstream station.¹³ CAP geographic data should therefore remain an optional tool for informed local judgment.¹⁴

The Commission also proposes the adoption of new legacy EAS location codes where existing county and partial-county descriptions are inadequate. Before adopting additional codes, the Commission should resolve the concerns identified by NAB and Sage, including those relating to complexity and alert overlap, limitations of the legacy location field, coordination with the NWS, and compatibility with installed equipment.¹⁵ CAP circles and polygons can provide optional geographic information without adding complexity to the legacy EAS location field.

V. Alert Symbols Should Remain Voluntary and Flexible in Their Presentation

The record reflects substantial agreement that alert symbols may be useful as a voluntary enhancement but should not become mandatory, particularly because radio and television

¹³ See Sage Comments at 7–8 (advocating for permitting, but not requiring, use of CAP polygons and explaining that polygon-based relay decisions may affect downstream stations relying on established monitoring assignments).

¹⁴ The Commission also asks whether CAP circles and polygons could improve targeting by television stations using ATSC 3.0. See Further Notice at ¶ 72. The State Associations previously registered their support for voluntary use of ATSC 3.0 advanced emergency-information capabilities. See State Associations 2025 Reply Comments at 8–11. Accord AWRN Comments at 1, 3–4 (explaining that voluntary ATSC 3.0 Advanced Emergency Information can supplement, but not replace, conventional EAS and that broadcasters do not have uniform facilities and capabilities); Comments of Sinclair, Inc., PS Docket Nos. 25-224, 22-329, 15-91, and 15-94, at 2–6 (filed Aug. 31, 2026) (“Sinclair Comments”) (describing how ATSC 3.0 can provide geographically tailored and supplemental emergency information to compatible receivers and recommending that advanced features develop without a mandate).

¹⁵ See Further Notice at ¶¶ 73–75; NAB Comments at 20–21 (explaining that additional fixed geographic segments could increase complexity and alert overlap without making legacy EAS location-aware and that locally understood areas may not map cleanly to standardized legacy codes); Sage Comments at 8 (identifying questions involving the legacy location field, assignment and description of additional codes, coordination with the NWS, and compatibility with equipment that validates existing numeric location codes).

stations, EAS equipment, and consumer receivers do not have uniform capabilities.¹⁶ The State Associations agree with NAB that stations should remain free to decide whether and how to display any common symbol set endorsed by the Commission. Before endorsing a symbol set, the Commission should ensure that it has been tested for clarity and comprehensibility and should consult broadcasters and equipment manufacturers regarding its implementation.¹⁷

VI. Any New Requirements Should Be Accompanied by Coordinated Guidance and Training

As the State Associations have previously noted, technical changes alone cannot ensure effective alerting.¹⁸ New requirements involving authentication, identifiers, geographic information, location codes, or presentation will require coordinated implementation throughout the alerting ecosystem. The Commission therefore should work with FEMA/IPAWS to provide centralized guidance and training before compliance becomes mandatory, explaining participants' responsibilities and the effects of the new requirements on CAP and legacy pathways, State EAS Plans, and monitoring assignments. Such guidance is particularly

¹⁶ See Further Notice at ¶¶ 77–82; NAB Comments at 21–23; Sage Comments at 8; AWARN Comments at 3–4; Sinclair Comments at 4–6.

¹⁷ See NAB Comments at 22–23 (discussing the costs and receiver limitations associated with radio implementation and recommending that television stations retain control over the placement, size, transparency, and duration of any symbols they elect to display); Sage Comments at 8 (explaining that requiring icons could significantly raise the cost of getting alert crawls on the air for smaller stations); AWARN Comments at 3–4 (recommending voluntary use of a clear and readily understandable common symbology set).

¹⁸ See State Associations 2025 Reply Comments at 13–15 (explaining that technical capabilities cannot substitute for alert-originator training and interagency coordination and urging the Commission, in cooperation with FEMA, to facilitate centralized training and coordination); *see also* Sage Comments at 7 (explaining that the effectiveness of broadcast geocoding depends on local geography, FIPS-code coverage, State EAS Plans, and alert-originator training that aligns expectations with broadcast EAS operations).

important for smaller, resource-constrained alerting authorities that cannot independently develop expertise on every technical change.

CONCLUSION

The State Associations respectfully urge the Commission to authorize software-based EAS as a voluntary option; apply the existing 60-day repair-or-replace period to software-based EAS; improve authentication through a measured, technically informed process; undertake further work before requiring a universal identifier or additional fixed legacy location codes; keep CAP geographic data, ATSC 3.0 enhancements, and alert symbols voluntary; and provide coordinated guidance and training for any new requirements. This approach will allow useful innovation while preserving the reliable, automated, and broadly deployed system on which the public relies.

Respectfully submitted,

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