



Modernization of EAS operations

**National Association of Broadcasters
Washington, DC
July 1, 2025**



Emergency Alert System (EAS) Modernization



- NAB Petition for Rulemaking (filed March 31, 2025) requests rule changes to allow voluntary use of software-based encoder/decoders
- Comments demonstrate broad support for petition
 - Radio, television, and cable/MVPD sectors
- Proposal is ripe for an FCC NPRM
 - Marketplace urgency
 - Software is more efficient and flexible
 - Public safety benefits

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

PETITION FOR RULEMAKING

Pursuant to Section 1.401 of the Commission's rules,¹ the National Association of Broadcasters (NAB)² hereby requests certain clarifications or amendments of the Commission's rules, as necessary, to allow, but not require, Emergency Alert System (EAS) participants to use software-based EAS encoder/decoder (endec) technology instead of a legacy physical hardware device to process EAS messages. As discussed below, modernizing the EAS rules to permit this voluntary approach would enhance the reliability and security of EAS, without compromising the system's effectiveness.

I. BACKGROUND

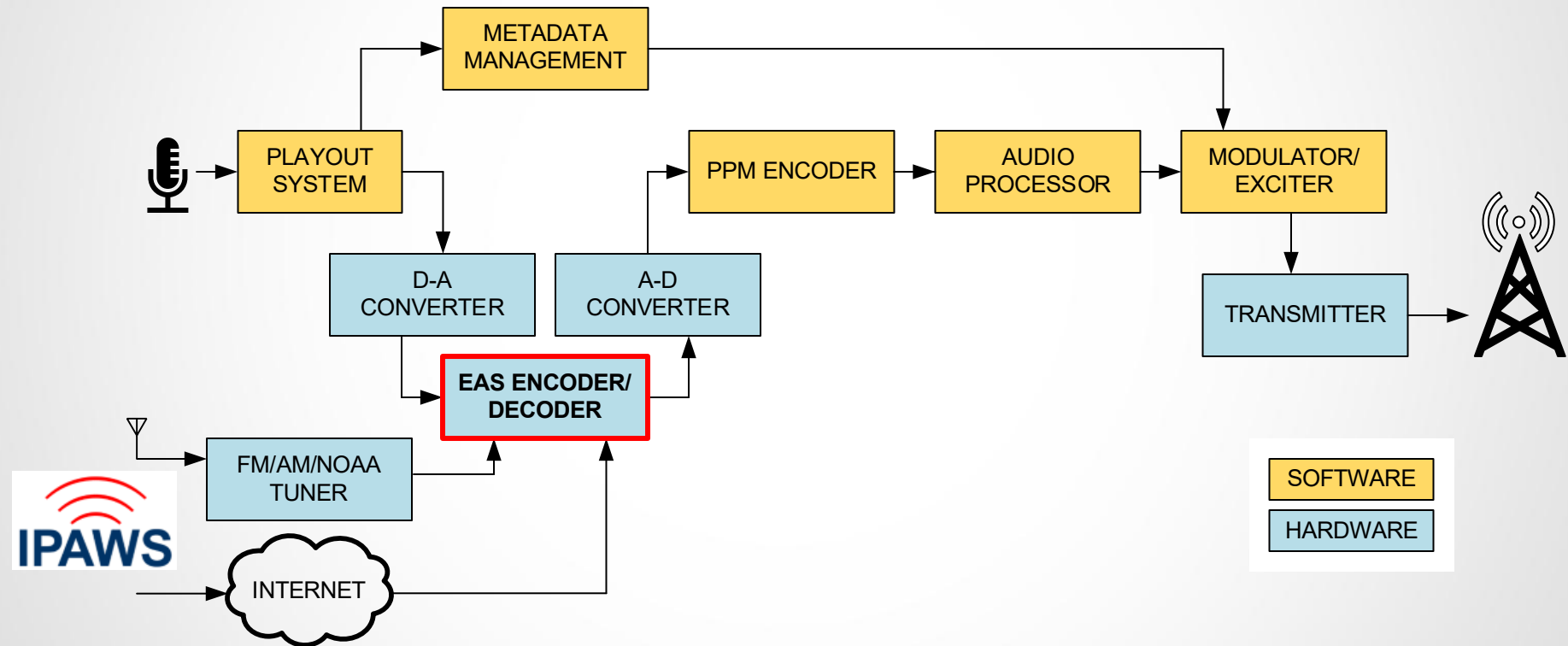
NAB developed this proposal with the advice of chief technology officers and senior engineers from many of the nation's leading radio and television groups, as well as small and medium-sized broadcast companies, and noncommercial broadcasters. We first proposed this EAS option in December 2022 in comments on a Notice of Proposed

¹ 47 C.F.R. § 1.401.

² The National Association of Broadcasters (NAB) is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

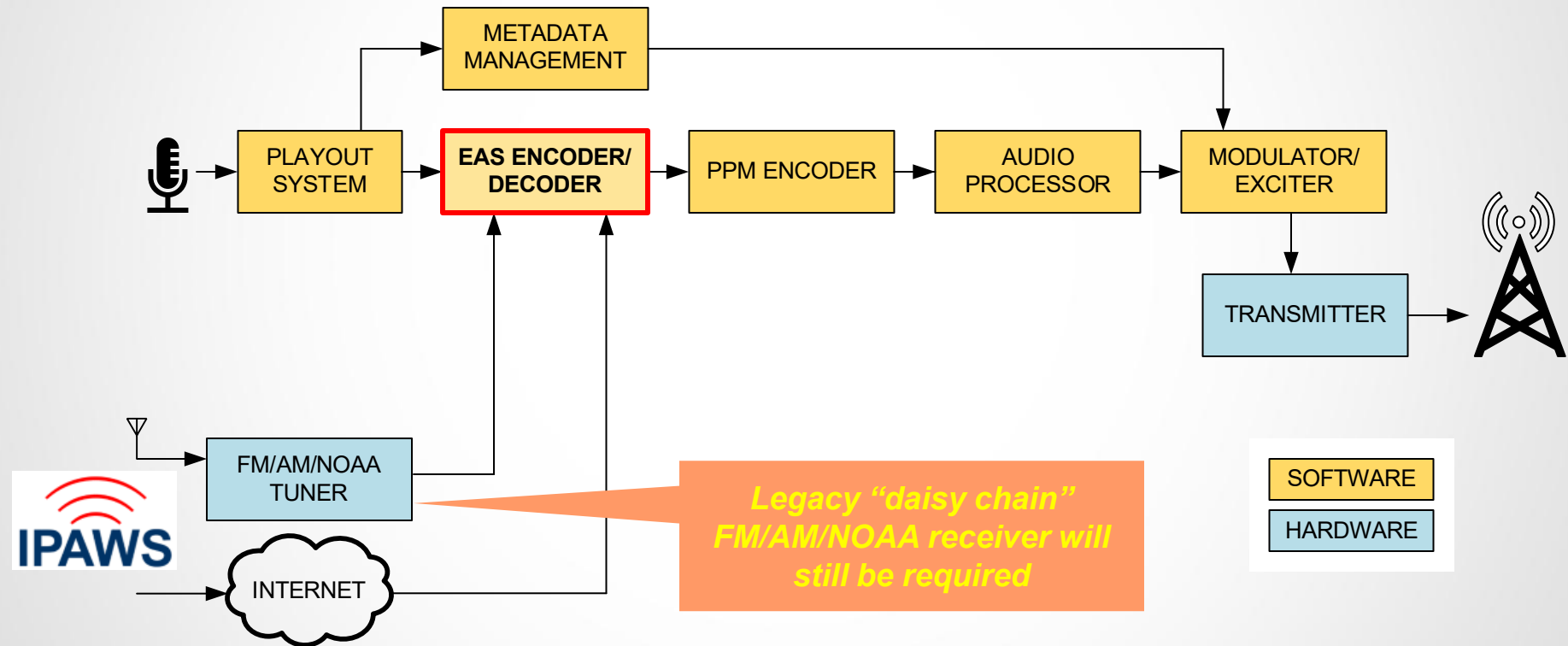


EXISTING





PROPOSED





Guiding principles of NAB's Proposal

- Voluntary: EAS Participants' option whether to adopt software-based approach
- Seamless Functionality: software-based model must be backward and forward compatible with existing EAS system
- Security: implementation must not reduce EAS security



Benefits of allowing software-based EAS solutions

- Streamline radio/television broadcast and cable architectures
 - Align EAS with remaining broadcast systems that already run on software
- Help avoid supply-chain problems
 - Sage Alerting Systems recently announced discontinuation of new hardware devices
 - Sage serves 90% of radio industry, all PEP stations, and many TV stations and MVPDs
 - NAB's proposal would invite alternative software models not dependent on supply chain
- Facilitate EAS upgrades and enhancements (e.g., multilingual alerts)



Benefits of allowing software-based EAS solutions

- Greatly improve EAS resiliency and operational readiness
 - Eliminate down-time to repair malfunctioning equipment
 - Reduce time to implement security-related patches
 - Enable immediate fail-over to redundant system in diverse geographic locations in case of disaster
- Enhance near-real time automated system monitoring
- Increase ability to manage and route messages to different broadcast audio and video streams (e.g., analog AM/FM, HD Radio main and multicast channels)



NAB's Proposal Furthers Goals of “Delete, Delete, Delete” Proceeding

- FCC EAS rules have not been significantly updated since 1994
- NAB's approach would “*alleviate unnecessary regulatory burdens*” on EAS Participants currently forced to use hardware devices
- “*Marketplace and technological changes*” have rendered certain EAS rules “*unnecessary or inappropriate*”
- “*Experience demonstrate[s]*” that existing mandate to use hardware EAS device “*no longer is needed going forward*”
- *Allowing software-based EAS model “would facilitate and encourage American firms’ investment in modernizing their networks . . . and offering innovative and advanced capabilities”*



Conclusion

- NAB's proposal is appropriate for prompt FCC consideration
- A voluntary software-based model will benefit the public, FCC, and EAS Participants
- The EAS community (FCC, FEMA, EAS Participants, and EAS manufacturers) can work together to resolve any outstanding issues



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