

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Modernization of the Nation’s Alerting) PS Docket No. 25-224
Systems)

To: The Commission

**REPLY COMMENTS OF
BIG CITY EMERGENCY MANAGERS (BCEM), INTERNATIONAL ASSOCIATION OF
EMERGENCY MANAGERS (IAEM), AND THE NATIONAL ASSOCIATION OF
EMERGENCY MANAGEMENT (NEMA)**

Pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, the BIG CITY EMERGENCY MANAGERS (BCEM), INTERNATIONAL ASSOCIATION OF EMERGENCY MANAGERS (IAEM), AND THE NATIONAL ASSOCIATION OF EMERGENCY MANAGEMENT (NEMA) (“BCEM, IAEM, and NEMA”) hereby submit Reply Comments in response to Comments in the above-captioned Notice of Proposed Rulemaking (“NPRM”) regarding modernization of the nation’s alerting systems.¹ We are grateful for the Commission’s effort to analyze the nation’s emergency alerting system. In evaluating how new technologies can improve emergency alerting, we urge the commission to not overlook the value of the existing emergency alerting technologies. In particular, public broadcasters, which are effective, efficient, and essential in emergency alerting, especially to rural communities that lack commercial alternatives or more modern connectivity.

Emergency managers rely on public broadcasters, including public radio stations, to send life-saving emergency alerts to residents in rural, suburban, and metropolitan areas. Hurricanes, tornadoes, wildfires, floods, and blizzards. Amber Alerts and Silver Alerts. The interconnected public broadcasting system reaches 99% of the country and is the only system capable of broadcasting these alerts to every corner of our nation. At the county and state levels we rely upon it frequently throughout the year.

Examples of public broadcasting’s emergency response are numerous. For example, in Alaska, KUCB in Unalaska was twice called upon in July 2025 to keep residents informed about a potential tsunami danger. For the July 29 tsunami caused by an 8.8-magnitude earthquake off the coast of Russia, KUCB worked with local emergency responders to correct an erroneous text message community members had received and to provide up-to-date and accurate information.

¹ *Modernization of the Nation’s Alerting System*, Notice of Proposed Rulemaking, PS Docket No. 25-224, FCC 25-50 (Aug. 8, 2025) (the “Notice”).

In Florida, all public media stations partner in the Florida Public Radio Emergency Network (FPREN), that provides comprehensive, multi-platform statewide storm coverage and emergency alerts enabling communities to track the paths of hurricanes with geotargeted information. In Michigan during a recent ice storm, WCMU in Mount Pleasant continued broadcasting even as eight counties in its 46-county coverage area lost power to 90% of homes and businesses. A commercial station lost a tower, but WCMU kept broadcasting. It took three weeks for crews to restore power to all customers. Meanwhile, WCMU was able to provide information to affected residents about warming centers, food distribution, and oxygen distribution for people who rely on oxygen-generating electronics. When wildfires struck large swaths of Oklahoma, KOSU in Stillwater and Oklahoma City broadcast 52 fire and evacuation warnings across a 10-county area.

Public radio stations are particularly vital to our emergency alerting infrastructure because (1) they reach into communities no one else does, (2) they closely partner with state and local emergency managers, and (3) they often sit at the top of the funnel, the primary entry point that receives the alert from emergency managers and then passes it on to commercial radio broadcasters, television broadcasters, and cable operators. And on top of that radio is a resilient and hardened communications technology. When the power goes out, and cell networks or the internet go down, there often is no way to reach community members other than over the radio. That's why when the FEMA National Advisory Council issued a report on Modernizing the Nation's Public Alert and Warning System in 2019, the advisory council encouraged FEMA to make "use of public broadcast capabilities to expand alert, warning, and interoperable communications capabilities to fill gaps in rural and underserved areas."

Because public media broadcasters are an essential emergency response partner for our members, we urge the Commission to continue to recognize the value that public broadcasters provide our nation's emergency alerting systems and to ensure that efforts to advance public safety through new technologies do not overlook, or worse yet harm, the effectiveness and efficiency of current emergency alerting partners, like public radio stations.