Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

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

To: The Commission

JOINT REPLY COMMENTS OF THE STATE BROADCASTERS ASSOCIATIONS

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Table of Contents

Page

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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]

SUMMARY AND INTRODUCTION

The State Associations appreciate this opportunity to assist and inform the Commission's efforts to modernize where necessary the nation's alerting systems, especially with regard to the Emergency Alert System ("EAS"). As the many supportive comments in the record show, the EAS is perhaps one of the most successful public-private partnerships in existence, with near-universal consumer recognition and a long track record of effectively alerting Americans in times of emergency. Broadcasters have been and remain the backbone of public alerting through both their highly resilient, wide-reaching and heavily redundant facilities and through their participation in and leadership of the State Emergency Communications Committees (SECCs). Broadcast facilities remain operational when others do not and reach where others cannot. The

[1] *Modernization of the Nation's Alerting Systems*, Notice of Proposed Rulemaking, PS Docket No. 25-224, DA 25-50 (rel. August 8, 2025) (*hereinafter* "NPRM").

EAS has its own non-IP-dependent redundancy through the broadcast daisy chain that links stations together to bridge gaps where infrastructure and networks do not reach or are damaged. In addition, broadcasters are local and trusted by the public, helping the public to overcome the tendency to "mill" rather than act immediately on an alert.[2] Because of these facilities and capabilities that have grown and adapted over many years to meet the needs of the public, the EAS already meets the goals the NPRM sets out for it.

That is not to say that the EAS has reached its maximum usefulness, however. As the NPRM notes, technology is evolving. And the comments filed in this proceeding demonstrate that the broadcast industry is continuing to evolve its emergency communications capabilities along with it, perhaps in ways alert originators do not yet know or anticipate. These innovations have the potential to add pictorial or video content to broadcast EAS alerts and emergency messages, improve geotargeting, possibly wake sleeping wireless devices, and reinforce other alerting methodologies, amplifying the emergency message. This measured and voluntary approach—deploying new technologies when they are robust and proven enough to enhance rather than hinder public alerting—has been highly successful. For this reason, the State Associations support voluntary evolution through continued industry innovation rather than prescriptive rulemaking.

It is also important for all parties to recognize the difference between emergency *alerting* and providing supplemental information during an emergency. Maintaining a separation between these two very different types of messages assures that emergency systems do not stray

[2] "Milling" is a process that Professor Hamilton Bean describes as "searching for additional and confirming information before acting." *See Modernization of the Nation's Alerting Systems*, Comments of Professor Hamilton Bean, PS Docket No. 25-224 (August 22, 2025) at 2 (*hereinafter* "Bean Comments").

from the targeted goal of alerting the public, which would have the effect of taxing emergency networks and increasing the public's alert fatigue, potentially at great costs to EAS participants. Ultimately, any successful alerting ecosystem will need to balance the many priorities and proposals presented in this proceeding. If all of the proposals were adopted, the resulting alert fatigue could be staggering, undermining rather than enhancing the effectiveness of the alert system.

New communications platforms like video games and streaming, as well as new alerting methods such as local opt-in text messaging, are fracturing the audience for all alerting methods. In the end, there is no one perfect platform or alerting methodology. Public safety depends on multiple, redundant communication paths. That also means that alert originators need to be well trained in both determining which events are worthy of an emergency alert, and how best to engage with the various alerting systems to ensure that the portion of the public which is threatened is warned in time. The commenters in this proceeding are split on many issues, but they are united in focusing on the need to better and continuously train alert originators and improve coordination among the various agencies involved in public alerting. While the NPRM focuses heavily on potential technical advancements to the EAS or WEA, it is clear that the single most important action the FCC can take now to enhance public alerting is to facilitate better training of alert originators and improved coordination among alerting agencies.

I. The EAS Meets the Objectives for Which It Was Created and Those Set Out for It in the NPRM

In the NPRM, the Commission sets out three goals for alerting systems: (1) providing authorities with the ability to rapidly notify the public of emergencies that may put the public at risk; (2) delivering instructions that facilitate protection of life and property; and (3) providing

additional authoritative communications with the public before, during, and after an emergency.[3] As the NPRM notes, a core purpose of the EAS is to be able to transmit a Presidential alert in the event of a national emergency.[4] The 77 primarily AM radio stations that serve as the EAS's Primary Entry Point (PEP) stations alone reach approximately 90 percent of Americans.[5] The State Associations are on record, along with NAB, in support of the bipartisan *AM Radio for Every Vehicle Act of 2025* to help ensure that this powerful life-saving medium is available in all automobiles sold in the U.S.[6]

When an EAS alert is distributed, these PEP stations are joined by public television stations that serve roughly 97 percent of Americans,[7] public radio stations that serve about 99 percent,[8] and literally thousands of commercial radio and television stations, including religious, foreign language and tribal stations, serving every type and size of community in the country. As the Commission is aware, broadband and cellular coverage is far more limited, particularly in emergencies, where such facilities often fail or simply become overloaded by the added traffic generated by the emergency. In contrast, radio and television operate on a one-to-many basis,

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[3] NPRM at ¶ 7.

[4] NPRM at ¶ 9.

[5] *Modernization of the Nation's Alerting Systems*, Comments on Notice on Proposed Rulemaking of iHeartMedia, Inc., PS Docket No. 25-224 (September 25, 2025) at 15; *Modernization of the Nation's Alerting Systems*, Comments of the National Association of Broadcasters, PS Docket No. 25-224 (September 25, 2025) at 2 (*hereinafter* "NAB Comments").

[6] *See AM Radio for Every Vehicle Act of 2025,* S. 315, 119th Cong. (2025-26); *AM Radio for Every Vehicle Act of 2025,* H.R. 979, 119th Cong (2025-26).

[7] *Modernization of the Nation's Alerting Systems*, Comments of America's Public Television Stations and Public Broadcasting Service, PS Docket No. 25-224 (September 25, 2025) at 4 (*hereinafter* "PTV Comments").

[8] *Modernization of the Nation's Alerting Systems*, Comments of National Public Radio, Inc., PS Docket No. 25-224 (September 25, 2025) at 4 (*hereinafter* "NPR Comments").

making them impervious to most emergencies while achieving immense reach. And all this happens without putting pressure on other telecommunications networks and resources.

The EAS's ability to achieve a national footprint does not, however, mean it isn't just as capable for local and regional emergencies. Indeed, alerts and accompanying emergency information distributed via large regional stations can help address the problems of "threats in motion" identified by a number of commenters precisely because of broadcasters' ability to inform a larger area of the developing risk. And, as CISA notes in its *Ten Keys to Improving Emergency Alerts, Warnings & Notifications,*

> [it] is important to ensure that those not at risk do not receive inapplicable messages. With that said, AOs should be mindful that some hazards may impact locations of interest to these individuals, like the location of a family member or home, and might rapidly spread into unwarned areas. So, targeting should include people (and their devices), who are at risk from a hazard, or who care about people and property at risk from a hazard, and issued across areas where potential for the hazard to spread exists.[9]

Because of the flexibility created by EAS's incorporation of many thousands of local stations, emergency alerts can be distributed in as narrow or as broad of an area as desired, subject only to the coverage areas of the participating stations. Indeed, EAS has geotargeted since its inception. The fact that many EAS participants also provide supplemental information through newscasts, breaking news reports, and crawls has made the EAS partnership with broadcasters highly successful in getting alerts to the people that need to hear them, while making additional information available to the portion of the public that wants to hear more. For

[9] Cybersecurity and Infrastructure Security Agency, "*Public Safety Communications, Ten Keys to Improving Emergency Alerts, Warnings & Notifications*" at 12 (2019).

this reason, it is important that any reimagining of the EAS which might emerge from this proceeding not in any way interfere with broadcasters' ongoing coverage of emergency events.[10]

As broadcast stations' coverage areas vary in size, some full power AM and TV stations can meet regional alerting needs almost singlehandedly, while EAS's inclusion of LPTV and LPFM stations, which serve much smaller areas, allows emergency alerts to be distributed on a more granular basis. Further refining of the distribution area of an alert is made possible by the voluntary nature of broadcasters' carriage of non-Presidential alerts. This permits stations, familiar with the localized needs of their audiences, to distribute alerts affecting their listening or viewing area while avoiding those alerts that do not, minimizing alert fatigue. This two-layered system ensures that alerts reach the right people, and only the right people, even where the alert originator sent the alert to an overly broad area. In short, voluntary carriage of non-Presidential EAS alerts is a feature, not a bug, of the EAS,[11] and one which makes it a more intelligent and agile alerting system than most.

Importantly, broadcast stations deliver this reach even when other systems go down. Broadcast stations in general are equipped with backup power, generator fuel, and experienced local staff standing by to transmit emergency alerts and emergency information when disaster strikes. The 77 PEP stations are particularly hardened against the caprices of nature and man-made disasters to assure delivery of a Presidential message under any and all circumstances. The

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[10] *See, e.g.*, NAB Comments at 18 ("For more than two decades, local television stations have repeatedly described the disservice imposed on some television viewers who are automatically switched away from a broadcaster's live, detailed coverage of an emergency in favor of a cable operator's blue screen that carries only a bare-bones EAS message slide.").

[11] *See also Modernization of the Nation's Alerting Systems*, Comments of AWARN Alliance, PS Docket No. 25-224 (September 23, 2025) at 2 ("Requiring broadcasters to transmit every emergency alert would rapidly devalue the system and result in viewer 'alert fatigue.'") (*hereinafter* "AWARN Alliance Comments").

EAS has its own redundancy through the broadcast daisy chain, which should be recognized and preserved as an important built-in backup that remains functional even when IP-based transmission systems fail. All of this preparation for the worst of national emergencies benefits local alert originators and communities when instead local emergencies and weather crises arise. The comments filed in this proceeding cite numerous recent real-world examples of broadcasters remaining operational when other modes failed—from the Los Angeles wildfires (2025), Lahaina wildfire (2023), North Complex fires (2020) and Camp and Paradise Fires (2018) to Hurricanes Helene (2024), Ida (2021), and Florence (2018). These are not isolated anecdotes, but snapshots of the continuous record of broadcast reliability and resilience that no other technology can match.

Finally, it is worth noting that the EAS and broadcast stations deliver emergency alerts and emergency information free of charge to the public. Thus, the ultimate beneficiaries of public alerting, those who must take immediate action, do not need a subscription or have to buy expensive new equipment to benefit.

II. The Broadcast Industry Is Evolving Public Alerting Capabilities and Should Be Allowed to Continue to Do So on a Voluntary Basis

While the EAS and broadcasters have proven their value in times of emergency again and again, the industry is not standing still, as some commenters seem to assume. The comments reflect an industry that is using technological advances to enhance the delivery of alerts and supplemental emergency information in new, and in some cases, unexpected ways.

- Xperi Inc. explains that HD Radio and related technologies can carry enhanced text, images, and multilingual content to receivers and it is pursuing "wake-up" signaling, short video messaging and integration with smart-home devices.[12]

[12] *Modernization of the Nation's Alerting Systems*, Comments of Xperi, Inc., PS Docket No. 25-224 (September 24, 2025) at 5-6.

- NPR notes that its *MetaPub* metadata platform displays emergency information including images, text and links in real time on mobile devices, smart dashboards, HD Radio receivers, and online streams.[13]

- ATSC details a long list of capabilities built into the ATSC 3.0 Advanced Emergency Information ("AEI") standard. These include support for text, audio, video, sign language video, and multilingual alerts and information; the ability to send "update" and "cancel" messages; enhanced geotargeting; and compatibility with emerging platforms like smart TVs, connected vehicles and others. Pilot programs have validated the ability to deliver warnings with embedded video, evacuation notices containing maps, and multilingual alerts.[14]

- The AWARN Alliance highlights that the AEI standard can combat alert fatigue by providing a less intrusive and flexible environment to disseminate emergency information that complements but is distinguished from public alerting.[15]

- The PTV commenters explain that the PBS WARN system offers a redundant path for cellular WEA messages, ensuring delivery when other systems are down, and PBS datacasting supports the transmission of encrypted video, files, and other data for public-safety uses even without broadband capacity.[16]

Thus, in contrast to the technological "stagnation" the NPRM fears,[17] it is clear that the broadcast industry is as invested as the FCC and alert originators are in proactively anticipating the alerting and information needs of the public and are actively exploring new capabilities made possible by technological advances that support, rather than supplant, the existing EAS. Many of these innovations have the potential to bridge gaps in other alerting methodologies, unify and amplify alert originators' messages, and help overcome both technical failures and the human propensity to mill before taking action in an emergency.

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[13] NPR Comments at 7.

[14] *Modernization of the Nation's Alerting Systems*, Comments of ATSC, the Broadcast Standards Association, PS Docket No. 25-224 (September 25, 2025) at 2-3.

[15] AWARN Alliance Comments at 2.

[16] PTV Comments at 8, 12.

[17] NPRM at ¶ 5.

The FCC asks in particular whether the EAS should support video messages from the President.[18] Art Botterell, formerly of FEMA, cautions against "conflat[ing] the Presidential communication mission with public warning," and recommends that alerting systems "be used to announce an upcoming Presidential message to be delivered over broadcast networks, the Internet, and other routinely exercised capabilities," because "most actionable alerts will originate from State or local authorities regarding local conditions" anyway.[19] Digital Alert Systems similarly argues that "[v]ideo is better suited for *follow-on information*, not the initial alert message," and that while both alerts and follow-on information are needed, the EAS and WEA should not be stretched to fill the public information role.[20] Washington State's Emergency Management Division also considers video support of Presidential messages not to be a priority.[21]

Finally, the State Associations, having many broadcast members who are small operators, must acknowledge the concerns raised by commenters representing small operators regarding the costs of any mandated upgrades to enable new capabilities such as video. Taken together, the concerns raised by these commenters about blurring the line between emergency alerts and emergency information and the cost of meeting such mandates counsel that the rush to include more capabilities in the EAS be tempered by a concomitant concern about degrading the core functionality of the system and the cost-benefit balance, particularly given that EAS participation

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[18] NPRM at ¶ 9.

[19] *Modernization of the Nation's Alerting Systems*, Comments of Art Botterell, PS Docket No. 25-224 (August 22, 2025) at 3.

[20] *Modernization of the Nation's Alerting Systems*, Comments of Digital Alert Systems, PS Docket No. 25-224 (September 25, 2025) at 17, 28.

[21] *Modernization of the Nation's Alerting Systems*, Comments of Washington State Emergency Management Division, PS Docket No. 25-224 (September 24, 2025) at 4.

remains an unfunded mandate. The State Associations join with NAB in their support for innovation in the public alerting space, but such innovation should be allowed to occur organically and voluntarily. Innovations must be accomplished without sacrificing the core reliability of the EAS system, particularly where they begin to blur the line between an alert and post-alert informational messages.[22]

III. Public Safety Is Best Served when Multiple Modalities Are Used

Public safety requires that Americans have the opportunity to receive emergency alerts through multiple modalities. No single platform, device, or delivery path can reach everyone or function under all conditions.[23] Even technologies that may appear to some to be "old fashioned"—such as sirens, airhorns, or electronic highway signs—remain indispensable when other communications fail or the emergency is in an area they cannot reach. While CTIA claims that 90 percent of test alert recipients received recent WEA tests on their phones,[24] that is demonstrably not the case outside the ideal "fair weather" circumstances of a test, where real world disasters often terminate or hinder cell service early in an emergency. Nor would it be the case where, as USGS suggests, WEAs are suppressed to avoid distracted driving behaviors on

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[22] It should also be noted that representatives of WEA interests raised similar concerns. *See, e.g.*, *Modernization of the Nation's Alerting Systems*, Comments of CTIA, PS Docket No. 25-224 (September 25, 2025) at 2 ("Proposals to introduce features and services that are secondary to WEA's central bell-ringer function should be considered only to the extent that they are compatible with, and do not detract from, WEA's design.") (*hereinafter* "CTIA Comments").

[23] *See e.g.,* Botterell Comments at 1 ("In the United States there is a lingering misapprehension that some single alerting technology can be sufficient to achieve all the goals of warning and emergency public information. For both sociological and technological reasons, a coordinated concert of consistent warning messages over multiple channels must be implemented to achieve either reliability or effectiveness."); Bean Comments at 2 ("There is no singular, perfect alerting system. The challenges of public alert and warning are not merely technological but fundamentally human and communicative.").

[24] CTIA Comments at 4.

cellphones detected to be in moving vehicles.[25] Moreover, in the words of CISA, "people rarely act on a single message alone, so delivering messages through multiple channels increases public attention and audience reach, confirms message importance and authority, and encourages the taking of protective actions."[26] For these reasons, EAS, despite having roots in the Cold War, remains highly relevant as an important tool for alert originators.

Much is made in the comments of the need to alert consumers who choose to consume media via their smartphones and other devices. The State Associations note that accommodating consumers' choice to use such devices should not be allowed to impede their ability to also receive emergency alerts and information via broadcast. For example, consumers may well choose to listen to emergency alerts and information on a car radio while evacuating *precisely because* they are reserving their cell phones to help them navigate through unfamiliar areas or to call friends and families to check on them/receive the validation they need to stem milling behavior, or simply to preserve cell phone battery during uncertain times. Forced tuning to video messages and network congestion caused by attempted widespread transmission of long-form content-rich messages to many types of devices will not succeed if it interferes with consumers' ability to use their devices as they choose. Emphasizing WEA at the expense of EAS is not productive. All of these alerting systems serve a complementary purpose, particularly for that segment of the population that insists on hearing of an emergency from multiple sources before acting.

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[25] *Modernization of the Nation's Alerting Systems*, Comments of USGS, PS Docket No. 25-224 (September 15, 2025) at 11-12.

[26] Cybersecurity and Infrastructure Security Agency, "*Public Safety Communications, Ten Keys to Improving Emergency Alerts, Warnings & Notifications*" at 11 (2019) (*footnote omitted*).

Having said that, the State Associations also have first-hand experience with the sheer volume of alerts that can be issued by multiple alerting authorities over time. Allowing those alerts to be indiscriminately sent directly to consumer devices will vastly exacerbate alert fatigue. This is especially true if other proposals made in this proceeding, such as prohibiting consumers from opting out of alerts, making carriage of EAS alerts mandatory, and implementing the ability to awaken sleeping devices, all take effect. The resulting cacophony of devices clamoring for attention, waking consumers, and panicking the public as individuals struggle to assess why their devices are suddenly accosting them, will surely create consumer backlash. It will also result in something worse than alert fatigue—alert indifference. Thus, the more modalities alert originators have at their disposal, the more important it becomes to ensure adequate training and procedures that focus on the need for discretion and coordination in issuing alerts.

IV. Alerting Is a People Business, Making Improved Training and Coordination Essential

Alerting is, above all, a *people business.* Technology transmits messages, but humans decide whether circumstances warrant an alert in the first instance and what the content of the alert will be. Then human recipients of the alerts ultimately decide whether, how, and how quickly to act in response to the alert. Broadcasters are the trusted, familiar human voices who interpret, reiterate, and contextualize official warnings before, during, and after an emergency. Local stations perform this connective role every day—explaining what new information means, repeating instructions where needed, providing updates on conditions, and calming their communities during a stressful time.

That service begins long before any alert is issued. Broadcasters and State Association personnel devote untold uncompensated hours to State Emergency Communications Committees, crafting state EAS plans and coordinating with emergency officials and the FCC.

These relationships make broadcasters a natural human bridge between the government systems that issue alerts and the public that must respond. This is a role that few others are clamoring to take on and one that, like the role of alert originator and the FCC's own role, has not been supplanted by technology.

The NPRM, while focusing on technical innovation and capabilities, begins from a people-focused question—what serves the alert originators best? Nearly every governmental agency that has commented in this proceeding identified training as the nation's most urgent alerting need.

- The California Office of Emergency Services called for FEMA to create a national certification and recertification program for alert originators with regular cross-agency training.[27]
- The Oregon Office of Emergency Management reported that "regular training and exercises improve alert quality and consistency."[28]
- Professor Hamilton Bean noted that alerting systems must be grounded in evidence-based message design and training.[29]
- NAB called on the FCC to "consider additional funding and training that could increase the number of AOs that can use EAS accurately and promote more collaboration among AOs."[30]

Improved training, perhaps implemented in concert with the FCC and FEMA, would help alert originators understand EAS capabilities and the difference between formal EAS activations and emergency information, as well as to avoid highly publicized errors that have undermined public confidence in government alerts.

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[27] *Modernization of the Nation's Alerting Systems*, Comments of California Governor's Office of Emergency Services, PS Docket No. 25-224 (September 25, 2025) at 1.

[28] *Modernization of the Nation's Alerting Systems*, Comments of Oregon Department of Emergency Management, PS Docket No. 25-224 (September 24, 2025) at 5.

[29] Bean Comments at 3.

[30] NAB Comments at 3.

Finally, additional coordination among all parties is widely desired. As CISA noted in its *Ten Keys to Improving Emergency Alerts, Warnings & Notifications*, alert originators should coordinate with AM and FM radio, satellite radio, digital and analog TV, and other outlets to maximize reach. Proper coordination and understanding of existing tools will save far more lives than any new technical mandate. The FCC should therefore focus its efforts on alert originators, enhancing their knowledge and understanding of the alerting systems they will be called upon to intelligently deploy in an emergency.

In a similar vein, the State Associations agree with the New York State Division of Homeland Security and Emergency Services and other governmental commenters on the importance of collecting and sharing with relevant parties after-action data following alert activations or nationwide tests.[31] The State Associations are often in the best position to make improvements within their state, both with regard to modifying their state EAS Plan and proactively reaching out with training and assistance to any station that experienced difficulties relaying the test alert. However, the State Associations have previously asked the Commission to provide them with the post-test information it collects identifying system failures and stations that failed to successfully transmit the nationwide EAS test message and have been rebuffed. On a local level, it is always hardest to fix that which we don't know is broken.

But with regard to improving emergency alerting on a national level, rather than focus on the prospect of shiny new technologies, the lowest-hanging fruit is improving on the quality and proper quantity of messages going into the alert system. The FCC is well positioned to

[31] *Modernization of the Nation's Alerting Systems*, Comments of the New York State Division of Homeland Security and Emergency Services, PS Docket No. 25-224 (September 25, 2025) at 2.

spearhead an effort to facilitate improved training and coordination among alert originators and government agencies, and should pursue that objective before any other.

CONCLUSION

In seeking to improve emergency alerting, the State Broadcasters Associations urge the Commission to keep its focus on *people first.* A diverse, redundant, and trusted alerting ecosystem—including broadcast radio and television—saves lives precisely because it reaches Americans through multiple modalities, some of which are more trusted than others. The record confirms that broadcast EAS remains indispensable, that technical evolution has led to numerous improvements that will continue into the future, that any new government mandate on EAS would only impede these steady voluntary improvements, and that the most effective step the Commission can now take is to collaboratively strengthen training for alert originators and promote better coordination among the multiple parties in the alerting ecosystem.

Respectfully submitted,

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