

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

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

REPLY COMMENTS OF XPERI INC.

Xperi Inc. (“Xperi”) appreciates the opportunity to provide additional comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking (“NPRM”) exploring opportunities for improving the nation’s emergency alerting systems.¹ We support the Commission’s efforts to strengthen and modernize emergency communications and continue to advocate for the benefits of Xperi’s HD Radio™, In-Band, On-Channel (“IBOC”) digital broadcast technology and its value in enhancing emergency alerting capabilities, particularly with respect to the Emergency Alert System (“EAS”). In addition to technology upgrades, Xperi urges the Commission to consider the broader infrastructure vulnerabilities that may impact the reliability and reach of the nation’s emergency alerting systems, particularly in rural and Tribal communities.

I. RADIO BROADCASTING REMAINS A KEY LIFELINE FOR RURAL AND TRIBAL COMMUNITIES

Broadcasting remains a key component of the nation’s emergency alerting architecture, as Xperi and many other commenters emphasized in the opening comment round.²

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

² See Comments of National Public Radio, Inc. at 3 (“NPR Comments”); Comments of the National Association of Broadcasters at 2 (“NAB Comments”); Comments of iHeartMedia, Inc. at 3-4 (“iHeart Comments”). Unless otherwise noted, all filings cited herein were filed in PS Docket No. 25-224 on Sept. 25, 2025.

Commenters emphasized that broadcasting provides a more resilient format for emergency alerting, with the capability of providing significant coverage, “particularly to sparsely populated areas.”³ This ability to reach sparsely populated areas is critically important to our nation’s rural and Tribal communities, who often live in areas where AM and FM radio remain the only reliable source of emergency alerting capabilities and information. NPR notes as much in its comments, pointing out that public radio stations “reach nearly 99% of the U.S. population over the air... including areas with no other local information sources.”⁴ Other commenters also highlighted that AM and FM radio broadcasting is able to operate independently of broadband or cellular networks and continue functioning during power outages and natural disasters,⁵ key requirements for a resilient emergency alerting framework that has appropriate redundancies in place to ensure emergency alerts are received by vulnerable communities.

The importance of these characteristics to rural and Tribal communities has been proven time and again in real-life emergency scenarios, including:

- In 2023, in Wrangell, Alaska, following a deadly landslide that cut off electricity, internet, and phone service, public radio station KSTK-FM was the only source of emergency information that locals could rely on.⁶

³ Comments of Sinclair Inc. at 3 (“Sinclair Comments”).

⁴ NPR Comments at 3.

⁵ See iHeart Comments at 17; Sinclair Comments at 2; NAB Comments at 11-12; NPR Comments at 1-2.

⁶ Corporation for Public Broadcasting, *Emergency Journalism Coverage: KSTK Wrangell Landslide* (2024), available at <https://cpb.org/programs/Emergency-Journalism-Coverage-KSTK-Wrangell-Landslide>.

- In 2024, in Sitka, Alaska, after an internet and cellular outage lasting over two weeks, public radio station KCAW-FM expanded its emergency capacity to keep residents informed.⁷
- In 2010, during a two-day power outage, FM station KUYI-Hopi Radio, a public radio station serving the Tribal communities of northern Arizona, broadcast evacuation updates to its many listeners spread across the expansive Native American reservations of northern Arizona and the Four Corners area, many of which had access to no other source of emergency information.⁸

The emergencies above are just a few of the countless examples of rural and tribal communities relying on AM and FM broadcast radio to receive critical emergency information; in fact, the record is replete with examples of the critical role AM and FM broadcast stations can play in serving their communities during emergencies.⁹ These examples underscore a key reality the Commission should recognize as it moves forward with this proceeding—broadcast radio is not just a legacy medium; it is a critical public safety tool.

II. THE COMMISSION SHOULD TAKE NOTE OF NEW RISKS IN THE EMERGENCY ALERTING ECOSYSTEM

In light of the critical importance of AM and FM broadcasting to ensuring a resilient, redundant, and wide-reaching emergency alerting system, the Commission should recognize that

⁷ Alliance of Rural Public Media, *In a Town Cut Off, Raven Radio Tuned In to Keep Sitka Together* (Dec. 20, 2024), available at <https://ruralpublic.org/blog-and-news/blog/in-a-town-cut-off-raven-radio-tuned-in-to-keep-sitka-together/>.

⁸ Kennedy Satterfield and Morgan Grey, *Public Radio at Risk: What's at Stake for Tribal and Rural Communities* (July 10, 2025), available at <https://aipi.asu.edu/blog/2025/07/public-radio-risk-whats-stake-tribal-and-rural-communities>.

⁹ See iHeart Comments at 8-9; NPR Comments at 4-5; NAB Comments at 13.

recent shifts in federal funding and agency operations have introduced new potential vulnerabilities in the alerting ecosystem. In particular, Xperi highlights that:

- The Public Radio Satellite System (“PRSS”), which distributes IPAWS alerts to community radio stations, faces increased uncertainty due to changes in CPB funding and operational oversight.
- Budget reductions to the Federal Emergency Management Agency (“FEMA”), the National Oceanic and Atmospheric Administration (“NOAA”), and the National Weather Service may impact the origination and coordination of alerts, particularly in remote areas.
- Community radio stations, many of which serve as Primary Entry Points, are experiencing increasing financial strain that could affect their ability to maintain alerting capabilities.

The Commission should recognize that modernizing and enhancing the nation’s public alerting capabilities requires not only technological innovation, but also maintenance and stewardship of the key pillars of the nation’s existing alerting infrastructure. Other commenters also made note of the importance of the continued funding of key infrastructure points in the EAS alerting ecosystem.¹⁰ These challenges threaten the redundancy and reliability of emergency alert delivery, especially in areas where radio is the last line of communication. To best address these vulnerabilities and enhance the nation’s alerting infrastructure, Xperi respectfully provides several recommendations for the FCC to consider.

¹⁰ See iHeart Comments at 18; NAB Comments at 4-5.

First, the FCC should consider how best to ensure infrastructure continuity for the distribution of Integrated Public Alert & Warning System (“IPAWS”) alerts, particularly through public media systems that serve hard-to-reach populations.

Second, the Commission should support redundancy and reliability in alert delivery mechanisms, including analog and digital radio pathways. Commenters agree that radio broadcasting is a key component of a redundant and resilient alerting system.¹¹

Third, the FCC should engage with community broadcasters, Tribal entities, and rural stakeholders to understand the localized needs and constraints of communities that may impact the efficacy and reach of emergency alerting systems.

Fourth, the Commission should promote sustainable investment in the systems and partnerships that underpin the broader emergency alerting ecosystem, recognizing that investment in more than just technology upgrades is an equally important component of meaningfully enhancing, modernizing, and expanding the nation’s emergency alerting capabilities.

¹¹ See NAB Comments at 11; iHeart Comments at 4; NPR Comments at 9; Sinclair Comments at 2.

III. CONCLUSION

Xperi appreciates the opportunity to submit further comments in this proceeding. Xperi remains committed to advancing technologies like HD Radio that are poised to improve public safety and communications. We also encourage the Commission to recognize that a robust EAS must not only embrace innovation but also protect the foundational infrastructure that ensures no community is left behind in times of crisis. We thank the Commission for its continued leadership in improving the nation's emergency alerting capabilities.

Respectfully submitted,

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