

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

In the Matter of	)	
	)	
Modernization of the Nation’s Alerting Systems	)	PS Docket No. 25-224
	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91
	)	
Amendment of Part 11 of the Commission’s	)	PS Docket No. 15-94
Rules Regarding the Emergency Alert System	)	

To: The Commission

**COMMENTS OF
NATIONAL PUBLIC RADIO, INC.**

Pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, National Public Radio, Inc. (“NPR”) hereby submits Comments in response to the above-captioned Further Notice of Proposed Rulemaking (“*Further Notice*”) in which the Commission seeks comment on how to modernize the nation’s alerting systems, including the Emergency Alert System (the “EAS”), and proposes amendments to the EAS rules.¹

NPR supports the Commission’s efforts to improve the EAS and remove outdated rules and appreciates the Commission’s thoughtfulness in this proceeding. Thus far, the Commission has properly considered whether particular proposals to update the EAS rules would truly serve the public interest, and NPR encourages the Commission to continue to adopt rules that will save lives

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 Dockets 25-224 and 22-329, and Further Notice of Proposed Rulemaking in PS Dockets 25-224, 14-94, and 15-91, FCC 26-38, (June 25, 2026).

while being mindful of regulatory burdens.² In doing so, however, we continue to urge the Commission to not overlook the strength of the existing EAS. Radio, including public radio, remains the most resilient and effective way to widely disseminate public information in emergency situations, and radio should remain an integral underpinning of any new emergency alerting program.

Among related matters, the *Further Notice* seeks comment on: (1) requiring the authentication of all alerts before transmission; (2) establishing a universal alert identification number to reduce duplicate messages; (3) expanding geotargeting options for EAS; and (4) removing outdated and unnecessary requirements by allowing implementation of EAS via software.³ As NPR has done in the past, NPR supports removing outdated rules to permit EAS implementation via software.⁴ On the new proposed requirements, we urge the Commission to adopt a policy of encouraging EAS participants to adopt new practices rather than mandating new requirements. Moreover, for any new policies or requirements adopted, the Commission must fully account for the costs any new requirements would impose on EAS participants such as radio stations, especially as many radio stations (both commercial and noncommercial) are facing extreme financial pressures even as their financial survival is vital to emergency alerting in rural and remote areas.

² For example, in the *Report and Order*, the Commission agreed with NPR's concerns that the Commission had underestimated the costs to individual EAS participants of creating (and implementing) a cybersecurity risk management plan and concluded that "addressing the most immediate threats to EAS Participants by adopting narrowly targeted security requirements to be more cost-effective than adopting the Commission's broad and burdensome proposal." *Report and Order* at para. 35.

³ *Further Notice* at para 2.

⁴ See, e.g., Comments of National Public Radio, Inc., PS Docket No. 15-94 at 7 (filed April 8, 2024).

I. PUBLIC RADIO REMAINS VITAL TO EMERGENCY ALERTING AT ALL LEVELS.

NPR is a non-profit membership corporation that produces, acquires, and distributes programming to approximately 1,100 noncommercial public radio stations nationwide. NPR also distributes content directly to its audiences through its website NPR.org, the NPR smartphone app, smart speakers, NPR podcasts, and natively on many social media platforms. NPR provides a variety of digital services to its Members and also represents public radio's collective interests in public policy matters.

NPR and the independent and locally operated NPR Member stations play a vital role in disseminating emergency information to the public. They are part of the essential backbone of the EAS and consider their public safety obligations part of their mission. At the national level, NPR operates the Public Radio Satellite System[®] ("PRSS"), which distributes programming to nearly 400 interconnected public radio stations serving almost 1,300 local NPR Member and non-member stations across the country. The PRSS receives the Presidential-level Emergency Alert System feed (officially known as Emergency Action Notifications) directly from the Federal Emergency Management Agency ("FEMA") and then transmits the alerts nationally to its interconnected stations, reaching 99 percent of all Americans. This large national infrastructure supports secure, reliable communications during emergencies without relying on the internet or wireless emergency alerts, which may be offline or become unreliable, particularly during power outages. NPR/PRSS has been named as a resource in at least 20 states' emergency plans,⁵ and many of the public radio stations in these twenty states serve as a Local Primary ("LP") station for the EAS.⁶

⁵ See *Alliance of Rural Public Media, Connecting America: The Essential Service of Rural Public Radio* at 23 n.20 (Oct. 2022) (citing State EAS Plans and State Emergency Communications Committee (SECC) Chairs, FCC (archived Feb. 27, 2021)), <https://ruralpublic.org/policy-and-research/report/>.

⁶ LP stations are primary sources for local area EAS alerts, and, in some states, they also relay these alerts to all stations in their operating area.

At the local level, NPR Members and other public radio stations are independently owned, noncommercial organizations dedicated to providing important public services for their communities, including life-saving public safety and emergency alerting along with noncommercial educational news, information, and cultural programming. Public radio stations reach nearly 99 percent of the U.S. population over the air, broadcasting news and information to urban, rural, and underserved areas of the country, including areas with no other local information sources.⁷ As EAS participants, public radio stations are required to broadcast Presidential alerts, and they participate in broadcasting state and local EAS alerts on a voluntary basis.

In addition to transmitting emergency alerts, public radio broadcasters routinely go above and beyond to make sure their local communities have the news and emergency information they need. Indeed, the efforts of public broadcasters to inform and keep their communities safe are well documented,⁸ such as the heroic work done by Blue Ridge Public Radio in Asheville, NC, during Hurricane Helene.⁹ Other examples include the public broadcasters in Oklahoma that were essential

⁷ In a Rural Public Media Survey, respondents from certain counties of Alaska, Idaho, New Mexico, and South Dakota stated that public radio is their only weekly or daily news source. See Tim Franklin et al., *The State of Local News Report 2025* at 24-25, MEDILL LOC. NEWS INIT., NORTHWESTERN UNIV., (Oct. 20, 2025), available at <https://localnewsinitiative.northwestern.edu/projects/state-of-local-news/2025/>.

⁸ The U.S Senate Committee on Commerce, Science and Transportation released a study highlighting how public broadcasters play a critical role in providing warnings and alerts during weather emergencies across the country. See U.S. Senate Committee on Commerce, Science and Transportation, *Public Broadcasting Snapshot: NPR and PBS Are More Than “Tiny Desk” and “Daniel Tiger”; They Are Critical to Public Safety* (June 2025), https://www.commerce.senate.gov/index.cfm?a=files.serve&File_id=94559A4E-B293-4B21-87A7-0AC31DB13E45.

⁹ During Hurricane Helene, the Blue Ridge Public Radio news team recognized that their radio station was one of the only forms of communication that could provide live emergency updates to the community. Laura Lee, Blue Ridge Public Radio’s News Director, explained that in order to keep the community informed they would “hold air and stay on the radio upwards of 12 hours a day to make sure that people were getting the information that they needed, because the information was so critical to daily living.” The news team even ensured broader language access for key emergency updates. Jose Sandoval, a reporter for Blue Ridge Public Radio, rigorously worked to

in responding to wildfires in March 2025, as they were the primary alert system for the community.¹⁰ Similarly, when a tornado cut a catastrophic swath across western Kentucky in 2021, the public radio station in the area was often the only source of emergency alerts because of power and communication outages.¹¹ And, after a severe earthquake in Russia led to a tsunami threat in Hawaii, the news team at Hawaii Public Radio delivered critical messages to the community, even when other persons fled the area.¹² As the Commission has recognized, radio broadcasters play a

translate their broadcast and Hurricane Helene updates into Spanish. See Mason Adams, *How a Western North Carolina Public Radio Station Covered Helene*, *WV Public* (Dec. 11, 2024), <https://wvpublic.org/story/arts-culture/how-a-western-north-carolina-public-radio-station-covered-helene/>. Jose provided details on various survivor and food assistance programs, in addition to which programs also offered Spanish translation services. See Rolando Arrieta, *Asheville Reporter Covers Helene's Impact in Spanish for Latino Communities*, *NPR* (Nov. 7, 2024), <https://www.npr.org/2024/11/07/nx-s1-5171072/asheville-reporter-covers-helenes-impact-in-spanish-for-latino-communities>.

¹⁰ *Supra* note 7 at 5. Another example from Oklahoma: In June 2025, thousands of visitors were in Oklahoma City for the NBA Finals and the College Softball World Series when tornado warnings needed to be issued during the evening commute. The national weather system supporting distribution of radio warnings began malfunctioning resulting in misses of tornado warnings. A local public radio station went on the air to report on the tornados and warnings and stayed on the air for hours giving people mile markers to avoid, helping them find safety. It wasn't a simple retransmission of a warning: It was an activation of the entire newsroom.

¹¹ U.S. Senator Maria Cantwell, Ranking Member of the Committee, stated that, “Public television and radio aren’t just for quality children’s television and unique radio content. For millions of Americans, these stations are often their only source of emergency information during weather disasters.” See U.S. Senate Committee on Commerce, Science and Transportation, *Cantwell Report Highlights Vital Role PBS and NPR Play in Warning Public During Weather Emergencies* (July 9, 2025), <https://www.commerce.senate.gov/2025/7/cantwell-report-highlights-vital-role-pbs-and-npr-play-in-warning-public-during-weather-emergencies>.

¹² Commissioner Gomez commended this essential work during a weather emergency and stated that, “Despite enormous personal risk, the journalists at Hawaii Public Radio stayed put while everybody else fled. In the end, it was public media who helped get the message out that there were other alternatives to leaving the area.” See Dak Dillon, *FCC Launches Fundamental Review of Emergency Alert System*, *NewscastStudio* (Aug. 8, 2025), <https://www.newscaststudio.com/2025/08/08/fcc-launches-fundamental-review-of-emergency-alert-system/>.

critical role in keeping Americans safe by relaying vital information on “evacuation orders, real-time guidance from public safety organizations, and the availability of other public services.”¹³

Radio is a vital, and at times the only, means for delivering life-saving emergency alerts and updates.¹⁴ For example, Colorado Public Radio maintains and operates a mountain-top tower, sometimes accessible only by snowshoe, to serve the 900-person town of Ouray. Public radio broadcasters are often the sole service in rural and more remote communities, and they also voluntarily alert audiences through numerous other means. And television and cable systems rely on radio broadcasters as the primary entry point for alerts¹⁵ – changes to radio’s role could easily upend a large part of the EAS system.

Public radio also provides emergency information to populations unserved by other news sources, such as the public radio stations that provide programming and public safety information in non-English languages.¹⁶ For example, primarily English-broadcasting KYUK in Bethel, AK, translated emergency alerts into the Yup’ik language, which is spoken by fewer than 10,000 people and is the most prominently spoken Native language in the state; WOJB-FM in Hayward, WI,

¹³ *Resilient Networks: Amendments to Part 4 of the Commission’s Rules Concerning Disruptions to Communications; New Part 4 of the Commission’s Rules Concerning Disruption to Communications*, Second Report and Order and Second Further Notice of Proposed Rulemaking, 39 FCC Rcd 623 at para. 42 (rel. Jan. 26, 2024).

¹⁴ *See supra* note 7.

¹⁵ *See* FEMA, Broadcasters and Wireless Providers, <https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system/broadcasters-wireless> (“The National Public Warning System (NPWS), also known as Primary Entry Point (PEP) stations, are radio broadcast stations that work with FEMA to provide emergency alert and warning information to the public before, during and after incidents and disasters. The FEMA NPWS also serves as the primary source of initial broadcast for a national alert.”).

¹⁶ *See Public Media in a Multilingual America*, CORP. FOR PUB. BROAD., (Oct. 26, 2022), (archived Jan. 6, 2026) <https://web.archive.org/web/20260106211812/https://cpb.org/spotlight/Public-Media-Multilingual-America>.

offered a variety of Ojibwe language segments and has translated public service announcements for help with taxes and pharmaceuticals; KFAI-FM in Minneapolis provided programming in Filipino, French, Somali, Spanish, Oromo, Tigrinya, and Vietnamese; and several stations, including WKAR in Lansing, MI, provided real-time Spanish-language translations of top news stories and during emergencies.

When disaster strikes a community and essential services like electricity, telephone and internet go out, radio is often the only communications link still available.¹⁷ As the Commission evaluates new rules for EAS, it is important that new requirements not hamper the ability of local public radio stations to deliver on the public safety mission that they are ready to serve so well.

II. ADOPTING UNFUNDED MANDATES WOULD NOT SERVE THE PUBLIC INTEREST.

NPR supports the Commission's efforts to improve the EAS by increasing safeguards and removing outdated rules. In doing so, however, the Commission should not adopt new requirements that impose unfunded mandates on EAS participants. This is particularly important for smaller broadcasters, including public radio broadcasters, with limited resources. The Commission must be mindful about the costs and resources required to implement new mandates, which are uniquely felt by smaller radio outlets.

¹⁷ Radio is so essential during emergencies that Congress is working on bipartisan legislation to mandate that electronic vehicles include AM radio technology, under the proposed AM Radio for Every Vehicle Act, H.R. 979, 119th Congress (2025). The National Association of Broadcaster's President, Curtis LeGeyt, underscored the importance of this bill, stating that, "AM radio remains essential to public safety, and every American deserves access to it in their car." Congressional representatives across the aisle have emphasized how critical AM radio is to their constituencies. The House of Representative's Commerce Committee has recently agreed to a compromise to push the bill forward to a floor vote, and the Senate Commerce Committee's version of the bill has already cleared the Committee. *See House Panel Advances AM Radio Bill With Compromise, Inside Radio* (Sept. 17, 2025), https://www.insideradio.com/free/house-panel-advances-am-radio-bill-with-compromise/article_b04077fa-d02e-47e9-8301-8cc453701417.html.

With regard to requiring authentication before transmitting alerts and establishing a universal alert identification number,¹⁸ this could be a low-cost requirement for EAS participants if the updates can be handled within the EAS unit or software. But if that cannot be done through something like a firmware update, it would be a substantial burden, especially with automated stations, and could delay emergency alert transmission to the public. The Commission should, therefore, confirm the technical and financial feasibility of how these proposed new requirements would be implemented before making them mandatory for all stations.

NPR also supports the Commission's proposal to amend outdated rules to allow stations to use software-based EAS units.¹⁹ Indeed, as we stated in reply comments filed in January 2023:

Permitting software-based EAS units would enable stations covering a large geographic area to better tailor alerts to those who really need them, thereby guarding against EAS-alert fatigue, while still being able to widely distribute alerts when needed. And, unlike the current dispersed approach, stations that chose to use software-based EAS units could better tailor alerts without the significant additional costs.²⁰

NPR also joins the Commission in its interest in enhancing geotargeting for EAS.²¹ On geotargeting, we agree with the Commission's proposal to encourage participation from EAS stations rather than mandate it.²² NPR continues to believe that amending outdated rules would benefit both stations and the public interest, given that allowing software-based EAS could increase the potential for geotargeting by reducing the amount of equipment necessary while also increasing the capabilities of remaining equipment. However, instead of mandating new requirements,

¹⁸ *Further Notice* at paras. 41-55.

¹⁹ *Further Notice* at para. 94.

²⁰ Reply Comments of National Public Radio, Inc., PS Docket Nos. 15-94, 15-91, and 22-329, at 5 (filed Jan. 23, 2023).

²¹ *Further Notice* at para. 70.

²² *Id.*

encouraging EAS participants to make the changes would minimize burdens on stations with limited resources that may not be able to transition immediately.²³

III. CONCLUSION.

NPR appreciates the Commission's efforts to modernize the nation's alerting system and its recognition of radio's robust and resilient legacy in pushing emergency alerts to the public. NPR agrees with the Commission's view that any changes must minimize burdens on stakeholders.²⁴ NPR therefore urges the Commission not to adopt additional requirements that could potentially impose huge burdens on public radio stations even as it recognizes the important role public radio plays in the EAS today.

Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

/s/

Elizabeth A. Allen
Chief Legal Officer, General Counsel and
Secretary

Albert Jung
Senior Assistant General Counsel

Marta McLellan Ross
Chief of Staff and Senior Vice President,
Government & External Affairs

Brad Greenberg
Legislative Counsel
1111 North Capitol Street, NE
Washington, DC 20002

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²³ NPR also urges the Commission to recognize technical limitations of the current system when proposing any rules related to geotargeting. For example, a radio station cannot geotarget an area smaller than its transmitter's coverage area.

²⁴ *Further Notice* at paras. 6, 19, 87.