

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

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

COMMENTS ON FURTHER NOTICE OF PROPOSED RULEMAKING

iHeartMedia, Inc. (“iHeartMedia”) submits these Comments on the Commission’s *Further Notice of Proposed Rulemaking* proposing certain steps to improve the nation’s Emergency Alert System (“EAS”).¹ iHeartMedia focuses its Comments here on its support of the *FNPRM*’s proposal to permit, but not require, EAS Participants, including radio broadcasters, to employ software-based EAS technology.

I. INTRODUCTION AND SUMMARY

iHeartMedia is a leading global media and entertainment company specializing in broadcast radio, podcasting, digital, mobile, social, live events and on-demand entertainment. iHeartMedia is the licensee, via subsidiaries, of 868 local AM and FM stations. iHeartMedia also disseminates content via streaming, subscription, podcasting and other digital platforms.

All iHeartMedia broadcast radio stations are “EAS Participants” under the Commission’s rules. Operating radio stations of varying sizes in urban, suburban, and rural

¹ See *Modernization of the Nation’s Alerting Systems, Protecting the Nation’s Communications Systems from Cybersecurity Threats, Wireless Emergency Alerts, and 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, 15-94, and 15-91, FCC 26-38* (rel. Jun. 29, 2026) (“*FNPRM*” or, as applicable, “*R&O*”).

markets gives iHeartMedia substantial practical experience with emergency alert systems and a valuable perspective on the Commission’s proposals to improve EAS reliability and flexibility as technology evolves. iHeartMedia strongly supports the Commission’s tentative conclusion to allow EAS Participants to use EAS software on an optional basis because software-based EAS can enhance the flexibility and resiliency of radio’s emergency alerting capabilities, further strengthening broadcast radio’s role as one of the nation’s most resilient communications platforms. Software-based implementations will enable deployment of modern, locally controlled and hardened infrastructure that can support both traditional over-the-air EAS monitoring and IP-based alert delivery methods, including the Common Alerting Protocol (“CAP”). By expanding implementation options, while maintaining compliance with EAS requirements, software-based EAS can help broadcasters improve operational resilience and long-term sustainability, helping to ensure that broadcast radio remains a trusted and reliable source of emergency information for local communities, particularly during times when other communications systems are impaired.

II. ADOPTION OF SOFTWARE-BASED EAS SOLUTIONS WILL ADVANCE THE COMMISSION’S PUBLIC INTEREST GOALS

In the *FNPRM*, the Commission granted the petition of the National Association of Broadcasters (“NAB”) for the initiation of a rulemaking to permit the use of software for EAS alert processing as an alternative to the requirement to use dedicated hardware.² The Commission found: “We agree with the majority of commenters that granting NAB’s petition will provide an opportunity to align the EAS rules with modern technologies and potentially reduce unnecessary burdens on EAS Participants.”³ The Commission also agrees “with commenters like CMG that

² *FNPRM* at ¶ 88.

³ *Id.* at ¶ 89.

argue that the Commission should explore the technical and operational benefits that may arise from the use of EAS software, ‘includ[ing] streamlined operations, improved remote maintenance and control, and increased security of EAS equipment.’”⁴

As noted in the *FNPRM*, commenters document “broad support for the concept of using software to perform EAS functions in place of dedicated EAS equipment.”⁵ Consequently, via the *FNPRM*, the Commission “propose[s] to permit, but not require, EAS Participants to use software-based EAS encoder/decoder technology instead of a dedicated EAS hardware device to process EAS alerts.”⁶

A. iHeartMedia Strongly Supports the Commission’s Proposal to Permit Software-Based EAS Encoder/Decoder Solutions as an Optional Alternative to Dedicated Hardware Platforms.

As a radio broadcaster with a nationwide footprint, iHeartMedia speaks from the standpoint of an experienced operator in the real world in support of the proposed option to employ software-based EAS encoder/decoder technology as an alternative to dedicated EAS hardware platforms. That option will promote the public interest by fostering opportunities for technological advances to maintain and improve the responsiveness, security and reliability of the EAS system.

As noted above, the record already developed before the Commission “demonstrates broad support for the concept of using software to perform EAS functions in place of dedicated EAS equipment.”⁷ iHeartMedia concurs with the Commission’s expectation “that allowing use of software-based EAS would enable expeditious repairs, security updates, and compliance upgrades to an EAS Participant’s provision of EAS alerting, as well as more easily

⁴ *Id.* at ¶ 90 (quoting NAB Petition Comments of CMG Media Corporation (“CMG”)).

⁵ *Id.* at ¶ 94.

⁶ *Id.*

⁷ *Id.*

enabling backup EAS coverage when the primary software-based EAS source becomes unavailable....”⁸ In fact, software-based EAS protocol reflects how modern broadcast facilities are designed, operated and maintained today. Consequently, the *FNPRM* EAS software proposal will modernize Part 11 requirements without reducing system reliability or resiliency.

B. Permitting Software-Based EAS Technology For Broadcasters Is Consistent With and Complimentary to the Broadcast Industry’s Migration to Virtualized Infrastructure.

Overall, the broadcast industry has successfully adopted virtualized and software-defined architectures across automation, audio processing, monitoring, networking, routing, and content distribution. Software-based EAS is a natural extension of these existing broadcast technology trends. As recognized by the Commission, “[w]e also anticipate that our approach may spur innovation in EAS alert capabilities by RF transmission system ... equipment providers who integrate encoder/decoder software into their self-contained transmitter/signal processing systems.”⁹ From our viewpoint as a broadcast systems operator, iHeartMedia agrees that permitting software-based EAS technology as proposed in the *FNPRM* will encourage EAS modernization to evolve alongside established industry technology practices.

C. The Commission’s *FNPRM* Software-Based EAS Proposal Should Lower the Cost of EAS Compliance for Broadcasters, Lessening the Financial Burden of Providing Service to the Public.

Voluntary implementation of software-based EAS should reduce unnecessary capital expenditures associated with hardware refresh cycles for EAS Participants. Other commenters have emphasized “that the existing hardware-based EAS poses significant repair delays and reliability challenges, while a software-based approach could streamline maintenance

⁸ *Id.*

⁹ *Id.* at ¶ 94.

and improve overall system performance.”¹⁰ Other commenters observe that software-based EAS could “improve the [EAS] system’s effectiveness: for instance, by enabling systems to be repaired and updated much more efficiently through a software update or remote fix rather than factory repair of a physical device; by eliminating single points of failure through multiple instances of EAS software in diverse locations; and by facilitating the routing and targeting.”¹¹ iHeartMedia agrees with these commenters that software-based EAS should be more efficient and less costly than maintaining hardware EAS systems. As the Commission noted in the *FNPRM*, “enabling flexibility in EAS software deployment may make compliance with EAS obligations easier to manage, and reduce costs for those EAS Participants that elect to use EAS software.”¹²

In turn, lower EAS implementation costs via software systems will encourage broader adoption of modernized EAS functionality while preserving public safety objectives. Moreover, budget expenditures formerly dedicated to system maintenance can better be directed by broadcasters to programming serving the public interest and in meeting the other challenges of broadcasting in the current environment.

D. iHeartMedia Supports the *FNPRM*’s Certification Proposals for Software-Based EAS Systems.

The Commission stated in the *FNPRM* that “we tentatively agree with commenters that EAS software must be subject to a rigorous certification or other approval process before it can be allowed to be marketed and used.”¹³ Specifically, the Commission tentatively concluded that it should require “EAS software to be certified under a conformity

¹⁰ *Id.* at ¶ 90.

¹¹ *Id.*

¹² *Id.* at ¶ 96.

¹³ *Id.* at ¶ 104.

assessment scheme that is architecturally similar or identical to that under which EAS equipment is certified today ... i.e., EAS software would be submitted to an approved entity for testing and then to a certification body for approval.”¹⁴

iHeartMedia supports the Commission’s tentative conclusion that software-based EAS solutions should be subject to a rigorous certification and conformity-assessment process before deployment. Software implementations should meet the same functional, operational, and performance requirements currently applied to certified EAS hardware. Importantly, certification should focus on functional performance rather than prescribing specific hardware architectures.

E. Properly Certified Software-Based EAS Solutions Should Provide Cybersecurity Protections Equivalent To, Or Better Than, Dedicated EAS Hardware.

Noting cybersecurity concerns, the Commission proposes “before EAS software can be marketed or used, the responsible party seeking its certification should be required to demonstrate to the Commission that it has taken appropriate steps to secure the software.”¹⁵ iHeartMedia concurs, and is confident that properly certified software-based EAS programs will be able to provide cybersecurity protections equivalent to, or better than, dedicated EAS hardware.¹⁶ Specifically, software-based EAS should be subject to the same cybersecurity requirements and expectations adopted by the Commission in the Report and Order portion of FCC 26-38.¹⁷

As to one commenter’s questioning of the readiness of EAS Participants to successfully use and maintain EAS software,¹⁸ it is noteworthy that broadcasters increasingly

¹⁴ *Id.* at ¶ 106.

¹⁵ *Id.* at ¶ 112.

¹⁶ *Accord* CMG NAB Petition Comments, *cited at FNPRM* at ¶ 90.

¹⁷ *See R&O* at ¶ 13 (adopting specific cybersecurity requirements for EAS Participants).

¹⁸ *See FNPRM* at ¶ 96.

operate mission-critical systems using enterprise cybersecurity controls, including network segmentation, authentication controls, monitoring, patch management, and vulnerability remediation. Cybersecurity protocols are thus not novel concepts to broadcasting EAS Participants, particularly those selecting the option to transition to software-based EAS solutions.

F. The Commission’s *FNPRM* Properly Preserves Broadcast EAS Participants’ Flexibility in Meeting EAS Obligations.

In proposing to authorize software-based EAS systems for EAS Participants, the Commission states that “[f]lexibility is an important part of our proposal.”¹⁹ Accordingly, in the *FNPRM*, the Commission proposes “to permit, but not require, EAS Participants to use software-based EAS encoder/decoder technology instead of a dedicated EAS hardware device to process EAS alerts.”²⁰ Appropriately then, the *FNPRM* creates an optional path towards software systems for EAS Participants rather than mandating a hard technology transition.

Preserving the flexibility to utilize existing certified infrastructure when deploying EAS functions is critical to foster the evolution of EAS software and industry-wide adoption of beneficial technological developments. As the Commission stated in the *FNPRM*, “we believe that enabling flexibility in EAS software deployment may make compliance with EAS obligations easier to manage, and reduce costs for those EAS Participants that elect to use EAS software. We also anticipate that our approach may spur innovation in EAS alert capabilities....”²¹

The Commission’s highlighting the importance of flexibility while the industry begins to move into the software-based EAS ecosystem means that the Commission should

¹⁹ *Id.* at ¶ 113.

²⁰ *Id.* at ¶ 94.

²¹ *Id.* at ¶ 96.

remain committed to allowing broadcasters to determine whether hardware-based or software-based EAS solutions best meet their operational requirements.

VI. CONCLUSION

iHeartMedia, as a radio broadcaster and EAS Participant, welcomes the Commission's efforts to modernize and fortify the nation's emergency alert systems. Adoption of the Commission's proposal in its *FNPRM* to permit, but not mandate, EAS Participants to employ software-based EAS solutions will be a significant step to modernize and strengthen the nation's EAS protocols. The *FNPRM* proposal to permit software-based EAS protocols is: consistent with the broadcast industry's migration to virtualized infrastructure; with certification requirements will enhance cybersecurity; will lower the cost of EAS compliance; and, as an optional choice, will preserve broadcast EAS Participants' flexibility to adopt the technology that makes the most sense for their operations. iHeartMedia urges the Commission to promptly authorize optional software-based EAS encoder/decoder solutions for EAS Participants.

Respectfully submitted,

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