Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

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

PS Docket No. 25-224
PS Docket No. 22-329
PS Docket No. 15-91
PS Docket No. 15-94

COMMENTS OF THE LPTV BROADCASTERS ASSOCIATION IN STRONG SUPPORT OF APPROVING THE USE OF EAS SOFTWARE AND RELATED MODERNIZATION PROPOSALS

The LPTV Broadcasters Association (LPTVBA) respectfully submits these comments focusing on the proposals beginning at paragraph 88 of the Further Notice of Proposed Rulemaking (FNPRM) through the end of the item. LPTVBA is the national association representing Low Power Television (LPTV), Class A, translator, and independent full-power television stations—facilities that form the majority of licensed television stations in the United States and that deliver essential local emergency information to communities, especially in rural and underserved areas.

LPTVBA has a longstanding record of constructive engagement with the Commission on Emergency Alert System (EAS) issues affecting low-power stations. In recent proceedings, including the Commission's comprehensive review of LPTV rules, LPTVBA filed comments addressing the clarification of EAS obligations for LPTV and translator stations, emphasizing the need for practical rules that ensure reliable alert dissemination without imposing unnecessary equipment or operational burdens on smaller operators. Consistent with that history, LPTVBA has also advocated for technology-neutral approaches that allow LPTV stations to adopt modern transmission methods, including 5G Broadcast, capable of delivering emergency alerts with ultra-low latency even when cellular networks are congested or unavailable. This filing continues that constructive tradition.

LPTVBA commends the Commission for its clear-eyed leadership and foresight in launching this comprehensive modernization of the nation's alerting systems. By recognizing the limitations of legacy hardware, prioritizing cybersecurity resilience, and opening the door to software-based solutions and modern IP architectures, the Commission is taking precisely the kind of forward-looking action that will strengthen public safety for years to come. We

particularly applaud the Commission's decision to grant the National Association of Broadcasters' (NAB) Petition for Rulemaking and to propose rules that permit, but do not require, EAS Participants to adopt software-based EAS encoder/decoder technology. This balanced, practical approach reflects the best traditions of the Commission's public-interest stewardship.

LPTVBA **strongly supports the NAB** and urges the Commission to act quickly to finalize these rules so that the benefits of modernization can reach the public without unnecessary delay.

Support for Software-Based EAS (Paragraphs 88–117)

The Commission's recognition that the current hardware-centric regime has become outdated is both accurate and timely. As the FNPRM correctly observes (paras. 88–90, 100), the industry has already shifted toward IP-centric architectures; dedicated EAS boxes increasingly sit outside modern signal-processing chains; supply-chain challenges have reduced the number of viable hardware vendors; and lengthy repair cycles for physical devices create operational gaps precisely when the public most needs reliable alerts. By proposing to authorize software solutions running on certified hardware platforms located at the local facility, the Commission demonstrates commendable foresight and a practical understanding of how modern technology can better serve the public interest.

Software-based EAS will deliver several concrete public-safety and operational benefits:

- Rapid security patches, performance updates, and compliance changes without shipping devices or taking systems offline;
- Immediate fail-over to redundant instances, enhancing resiliency during evacuations or infrastructure damage;
- Lower long-term costs for smaller operators, including LPTV stations that currently bear recurring fees for aging hardware;
- Closer integration into modern IP-based air chains while preserving full compatibility with both legacy EAS codes and CAP-formatted alerts from IPAWS.

LPTVBA fully supports the carefully crafted safeguards the Commission has proposed: requiring the software to reside at the participant's local facility, rigorous certification or approval (paras. 104–110), cybersecurity demonstrations as part of the authorization process (paras. 111–113), and a shortened 72-hour operational-readiness repair window (para. 114). These measures show the Commission's thoughtful balance between innovation and the reliability the public rightly expects.

We likewise applaud the related proposal to retire the 90-character-maximum WEA message requirement (paras. 118–120). This outdated obligation forces dual messaging, creates inconsistency, and consumes valuable time during emergencies. Removing it is a simple, high-impact improvement that reflects the Commission's practical, results-oriented approach.

More Reliable IP-Based Pathways and 3GPP Capabilities

LPTVBA strongly encourages the Commission to continue its forward-looking emphasis on reliable IP-based delivery. 3GPP standards already embed robust Public Warning System (PWS)

functionality for cellular networks and for 5G Broadcasting. These standards support reception and dissemination of emergency alerts originating from IPAWS or formatted in the Common Alerting Protocol (CAP).

In particular, 3GPP Technical Specification **TS 22.268** *(Public Warning System (PWS) requirements*) establishes the core stage-1 requirements for PWS across GSM, UMTS, LTE, and 5G. Section 6 of TS 22.268 sets forth CMAS-specific requirements (also known as Wireless Emergency Alerts), defining the relevant classes of Warning Notifications—Presidential, Imminent Threat, Public Safety, Child Abduction Emergency, and State/Local WEA Test—and aligning with the framework established by FCC orders governing Commercial Mobile Alert System / Wireless Emergency Alerts. This specification, together with related 3GPP and ATIS standards, ensures that cell broadcast and 5G Broadcast systems can reliably receive and deliver IPAWS- or CAP-sourced alerts.

5G Broadcast, operating in receive-only mode, can deliver alerts with extremely low latency even when unicast cellular networks are congested—providing a complementary, highly resilient pathway fully consistent with the Commission's goals of rapid notification, delivery of protective instructions, and continued authoritative communications during and after emergencies. The Commission's willingness to look beyond legacy architectures toward these modern, standards-based solutions is exactly the kind of visionary leadership the public-safety community needs.

LPTV stations, operating under secondary status, stand ready to innovate and deploy such IP- and 5G Broadcast-based solutions on a voluntary basis, expanding reach to mobile devices and strengthening overall system resiliency without imposing new mandates.

Costs, Benefits, Compliance Timeframes, and Call for Prompt Action

The Commission's careful cost-benefit analysis (paras. 121–136) correctly concludes that the public-safety benefits of software-based EAS, improved authentication, better geotargeting, reduced duplicates, and retirement of the 90-character limit far outweigh the estimated one-time costs. Because software is permissive, stations for which costs exceed benefits need not adopt it—another example of the Commission's balanced, pragmatic approach. The proposed compliance timeframes (paras. 137–141)—30 days for retiring 90-character WEA messages, 12 months for EAS software authorization and related CAP authentication/location-code updates, and 36 months for remaining WEA enhancements—strike a reasonable and achievable balance between urgency and practical implementation.

LPTVBA therefore urges the Commission to adopt final rules promptly authorizing software-based EAS, retiring the 90-character WEA requirement, and advancing the other modernization measures in this FNPRM. Doing so will reduce unnecessary burdens on smaller operators, improve operational readiness and security, leverage modern IP and 3GPP technologies (including the PWS framework of TS 22.268), and better ensure that emergency alerts reach the public when lives and property are at stake.

We have every confidence that the Commission will continue to exercise the same foresight and decisive leadership that has characterized this proceeding, and we look forward to working with

the Commission, NAB, and all stakeholders to implement these important improvements for the benefit of the American people.

Respectfully submitted,

_/Frank Copsidas/____
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