

183 ST03

Carl Huie

From: James Burtle
Sent: Monday, June 16, 2003 10:13 AM
To: Robert Bromery; Charles Iseman; Carl Huie
Subject: FW: Safety Cast

-----Original Message-----

E-mail
From: Richard Rudman - Dial [mailto:rar01@earthlink.net]
Sent: Friday, June 13, 2003 4:39 PM
To: James Burtle
Subject: Safety Cast

Jim:

I sent the message below to Bonnie Gay and Joe Casey. Thought you should see it too.

Regards,

Richard

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As much as I hate to dump cold water on innovation, the concerns expressed in various emails to the FCC about the WB9XXT experimental effort are valid. I happened to meet and talk to the developer last month when I was in Virginia. They are convinced the impact will be minimal. Their claim is partially based on the short duration of interruptions they would cause.

The developers are former first responders with the absolute best of motives but who may have an imperfect understanding of AM and FM propagation, or that radio broadcasters are very concerned about any technology that would cause a loss of any audience for any length of time.

We now have a growing number of broadcast engineers with excellent technical and EAS credentials are questioning their claims now that their experimental phase has begin. It is really not their fault that the Experimental Branch did not flag their license application in time to look at the pros and cons in a better and less highly charged environment.

That having been said, I would suggest that the burden of proof should rest on the developer of this technology to now prove to the satisfaction of the FCC as well as to the broadcast industry that their technology will not interfere in a harmful way with on-air programming, especially emergency information including Part 11 operations.

The other point goes to concerns that about the huge investment in time and effort on the part of the broadcast industry to build the EAS. To those people, this experimental technology is being perceived as a slap in the face. If there is a flaw to be fixed in the EAS, it is that we need to find new ways to support those of us who are still dedicated to make it work, and begin work to plan for the next generation of warning technology.

With a draft strategy now on the table thanks to PPW, and solid recommendations from the MSRC, I would hope the mission and the path to better warnings under all conditions will become more clear.

Richard Rudman
(not speaking for PPW or anyone else)

From: Mike McCarthy <towers@mre.com>
Reply-To: sbe-eas@sbe.org
Date: Thu, 12 Jun 2003 17:51:40 -0500

To: sbe-eas@sbe.org
Subject: [SBE-EAS] Re: [SBE-Freq-Coords] Fw: [Pubtech] EAS Jammer WB9XTT

Again...reposted to the EAS list.

MM

At 04:36 PM 6/12/2003 -0600, you wrote:

>I thought this might be of interest

>

>Doug Drader

>Western Montana Frequency Coordinator

>----- Original Message -----

>From: "William Fawcett" <fawcetwd@jmu.edu>

>To: <pubtech@lists.wduq.org>

>Sent: Thursday, June 12, 2003 12:41 PM

>Subject: [Pubtech] EAS Jammer WB9XTT

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> >

> > Bonnie Gay

> > FCC EAS Office

> > Washington, D.C.

> >

> > Dear Bonnie,

> >

> > This is a follow-up to our phone call today. As the engineer of an

> > EAS-LP station, I am very concerned about the Safety Cast

> > (www.safetycast.com) system that was issued an Experimental STA

> > (#0183-EX-ST-2003) by the FCC

>on

> > June 11.

> >

> >

>https://gullfoss2.fcc.gov/cgi-bin/ws.exe/prod/oet/els/forms/sta/STA_For
>m.hts

> > ?mode=print&form_type=current&application_seq=25127

> >

> > The system basically overrides all FM radios within 1000 feet of an

> > emergency vehicle (sirens on). Our studios, and EAS receivers, are

> > located 100 feet from a major highway, 1 block from a regional

> > hospital and 5

>blocks

> > from a fire station. We have sirens pass our studios perhaps 30

> > times a week.

> >

> > If these units have Safety Cast enabled, they will interfere with

> > our EAS receivers. I currently monitor 4 FM stations in our role as

> > LP station.

>ANY

> > ALERT COMING IN when a safety cast broadcast takes place will be

> > effectively jammed.

> >

> > 1. If the jamming takes place during the data header (3 long breeps)

> > the Alert will not be forwarded.

> >

> > 2. If the jamming takes place during the audio message, the audio

> > message will be compromised.

> >

> > 3. If the jamming takes place during the closing breeps, there is

> > the possibility that it will hang up the system, causing rebroadcast

> > of

>another

> > stations commercials on my non-commercial station.

> >

> > In the last year there has been a major emphasis on emergency

>preparedness.

> > Part of that preparedness is the anticipation of potential SNAFU's,
> > and devising methods to mitigate those problems.

> >

> > There is NO DOUBT that at the very time that the EAS is required (a
> > major
> > disaster) that this will be the same times that emergency vehicles will be
> > rushing up and down the highways. This is not a theory, it is a fact. NO
> > amount of testing in Jacksonville or anywhere else is going to demonstrate
> > this fully- the problem will actually occur when the consequences will be
> > the most critical.

> >

> >

> > Furthermore, the Safety Cast approach to AMBER negates all the hard
> > work that broadcasters have placed into incorporating AMBER into the
> > EAS in the last two years. Safety Cast states that they can bypass
> > the time delays (i.e. safeguards) that are inherent in the AMBER
> > system. Here in Virginia, all localities must clear the AMBER
> > activation with State Police. Safety Cast AMBER allows local
> > agencies to bypass the STATE AMBER PLAN, and intentionally jam FM
> > broadcasters.

> >

> > Again, the potential for interference to a real broadcast AMBER
> > (CAE)

>alert

> > is very high.

> >

> > The STA for this jamming devices states "Licensee should be aware
> > that

>other

> > stations may be licensed on these frequencies and if any
> > interference occurs, the licensee of this authorization will be
> > subject to immediate

>shut

> > down.

> >

> > Irony isn't it, that Safety Cast will be testing a unit designed to
> > jam broadcast stations, and by this permit, as soon as they have a
> > successful test, they must terminate the tests. Think that will
> > happen?

> >

> > This ill-advised system must be nipped-in-the-bud before it gets
> > into the hands of local agencies who will prefer to ignore the FCC
> > rules if it

>suits

> > their purposes. I urge you to discuss this STA with Jim Burtle at
> > OET immediately and put an end to this nonsense once and for all.

> >

> > I seriously doubt if OET has thought through the ramifications
> > concerning EAS. This needs to be addressed now.

> >

> >

> > Sincerely,

> >

> > -Bill

> >

> > William D. Fawcett
> > Chairman, Shenandoah Valley Emergency Alert System
> > Member, Virginia S.E.C.C.

> >

> > cc: James Burtle, FCC OET
> > cc: Dale Bickle, FCC Media Bureau
> > cc: Ed DeLaHunt, FCC Media Bureau
> > cc: Mark Foss, CEO Safety Cast Corporation

> >

> > *****
> > Shenandoah Valley Emergency Alert System - SV LECC

