

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

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| In the Matter of |) | |
| |) | |
| Wireless Emergency Alerts |) | PS Docket No. 15-91 |
| |) | |
| Amendments to Part 11 of the Commission's Rules |) | |
| Regarding the Emergency Alert System |) | PS Docket No. 15-94 |

COMMENTS OF NATIVE PUBLIC MEDIA

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EXECUTIVE SUMMARY

Native Public Media (“NPM”) strongly supports the Federal Communications Commission’s (“FCC” or “Commission”) efforts to establish a dedicated Emergency Alert System (“EAS”) event code for Missing and Endangered Persons (“MEP”). As a non-profit organization committed to serving American Indian and Alaska Native communities through media and communications, NPM believes this initiative is a critical step in addressing the crisis of missing and murdered indigenous persons, particularly women and girls.

NPM’s comments highlight five key areas: (i) the disproportionate impact of missing and murdered cases on indigenous communities, underscoring the urgent need for action; (ii) the necessity of a unique event code for endangered adults who are not adequately protected by the current AMBER or Silver Alert systems; (iii) the fragmented nature of the current alert infrastructure for adults and the need for a unified federal response through the Integrated Public Alert and Warning System (“IPAWS”); (iv) the crucial role the FCC’s Office of Native Affairs and Policy (“ONAP”) should play in engaging with tribal nations on a government-to-government level, encouraging them to become IPAWS Alerting Authorities, and ensuring they have the resources to do so; and (v) the importance of the Commission adopting a vision and values statement to ensure this rulemaking remains centered on the human lives at stake.

NPM strongly urges the Commission to move swiftly in implementing the MEP event code, emphasizing the need for comprehensive training, culturally sensitive outreach, and a holistic approach that respects tribal sovereignty. By harnessing the power of IPAWS and fostering strong government-to-government relationships with tribal nations, the Commission has a unique opportunity to build a system that can make a meaningful difference in the lives of indigenous

communities across the country. This opportunity is not merely a technical undertaking but a moral imperative that demands the FCC's fullest commitment and deepest compassion.

COMMENTS

Native Public Media ("NPM") respectfully submits these comments in response to the Federal Communications Commission's ("FCC" or "Commission") Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceedings regarding revising the Emergency Alert System ("EAS") rules to adopt a new EAS event code for Missing and Endangered Persons ("MEP").

NPM, a non-profit organization founded in 2004, has a mission to serve American Indian Tribes and Alaska Native Villages through media and communications. Its primary goal is to amplify Native voices, stories, and perspectives while supporting indigenous media organizations across the United States. NPM's Native Broadcast Network, which has sixty radio and three television stations, plays a crucial role in increasing Native American representation in media and providing a platform for indigenous voices to be heard. By advocating for policies that utilize broadcast assets and support tribal communities, NPM's vision is to reach geographically isolated communities with service area limitations. Fifty-nine stations in the NPM Native Broadcast Network are situated in tribal homelands.

NPM strongly endorses the goals outlined in the NPRM to enhance the reach and impact of missing person alerts, especially for missing persons from tribal communities.¹ Utilizing a

¹ NPM also concurs with the comments submitted by the Seattle Indian Health Board (SIHB) and Urban Indian Health Institute (UIHI) recommending that the name of the alert system should reflect a designated code specifically identifying American Indian and Alaska Native ("AI/AN") persons, rather than using a generic term like MEP. As SIHB and UIHI point out, failing to explicitly name the alert for indigenous individuals risks misalignment with the intended purpose of serving the AI/AN population and could lead to the system being used for other purposes. Adopting an AI/AN-specific name, as was done with alert systems in states like Washington and

dedicated EAS event code for missing person alerts can significantly improve communication, response, and recovery capabilities, improving outcomes for missing person cases and preserving lives. Tribal governments are acutely aware of the challenges inherent in missing person cases within their communities and recognize the potential benefits of the proposed MEP event code. By leveraging the existing broadcast infrastructure and the NPM Native Broadcast Network, the MEP event code can be actively deployed to reach remote and underserved tribal communities, ensuring swift and efficient dissemination of critical information.

NPM is dedicated to collaborating with the FCC and other stakeholders to ensure that the implementation of the MEP event code addresses the distinct needs and challenges of tribal communities. Leveraging knowledge in media and communications tailored to American Indian Tribes and Alaska Native Villages, NPM is uniquely positioned to offer valuable insights and recommendations optimizing the effectiveness of the MEP event code within tribal communities.

Through its expertise, NPM presents a comprehensive perspective on the MEP event code and its potential to address critical issues affecting tribal communities nationwide, structured in five parts. Part I addresses the pressing issue of the disproportionate number of missing and murdered indigenous women and girls, stressing the urgent need for action. Part II highlights the necessity of a unique event code for adults, as the current Amber and Silver Alert systems do not adequately protect them. Part III examines the fragmented alert infrastructure for adults currently in place and advocates for a uniform federal response. Part IV emphasizes the vital role of the FCC's Office of Native Affairs and Policy ("ONAP") in government-to-government relationships with tribal nations and meaningful engagement that encourages and supports them as Alerting

California, would help ensure the new code is responsive to the crisis of missing indigenous people.

Authorities within the Integrated Public Alert and Warning System (“IPAWS”). Part V underscores the significance of the Commission adopting a vision and values statement to ensure that this rulemaking remains centered on the human lives at stake rather than solely on technical or funding requirements.

Through these lenses, NPM contributes a holistic understanding of the MEP event code and its potential to impact indigenous communities nationwide positively.

I. The Disproportionate Number of Missing and Murdered Indigenous Women and Girls Tells a Grim Story.

The disproportionate number of missing and murdered indigenous women and girls tells a grim and gut-wrenching story that demands urgent action. For far too long, tribal communities have faced an epidemic of violence and disappearances that has gone largely unnoticed by the broader public. The data paints an alarming picture: Native Americans account for a staggering 2.5% of all missing person cases despite making up only 1.2% of the U.S. population, according to the National Crime Information Center.² Behind each of these statistics is a precious life—a mother, a daughter, a sister, a friend—ripped away from their loved ones and community. And these cases are likely underreported and misclassified. The causes behind this crisis are complex and rooted in a long history of marginalization, discrimination, and systemic failures. Lack of resources, jurisdictional challenges, and often apathetic responses from law enforcement have allowed perpetrators to act with impunity. Meanwhile, families are left to grapple with the unimaginable anguish of not knowing what happened to their loved ones.

² National Congress of American Indians (NCAI), *To Establish a National Federal Communications Commission Event Code for Missing and Endangered Persons*, Resolution #NO-23-001 (2023).

Take, for example, the harrowing story of 27-year-old Pepita Redhair (Navajo). On March 24, 2020, Pepita left her mother’s home in Crownpoint, New Mexico—a small town on the eastern edge of the Navajo Nation—to spend a few days with her boyfriend in Albuquerque.³ The first signs of trouble arose when Pepita’s mom, Anita King (Navajo), texted to check in and got no response—highly unusual for Pepita. King’s intuition told her something was wrong, so she reported Pepita missing. However, Albuquerque police failed to conduct critical interviews or a thorough investigation due to the COVID-19 pandemic. Local news stations refused to cover Pepita’s case without approval from the police department. The boyfriend, who had a history of violence toward Pepita, was never treated as a suspect. King was forced to post fliers and conduct searches herself. The boyfriend cut off contact when King tried to collect Pepita’s belongings. Four years later, King is still fighting for any scrap of information, even as she grieves the loss of her husband, who died without knowing what happened to their daughter. Pepita’s case shows how families of missing indigenous women are often left to search on their own, with authorities quick to dismiss their concerns.

Even more troubling is that New Mexico, the state from which Pepita vanished, has the grim distinction of having the highest number of missing and murdered indigenous women and girls (“MMIWG”) cases in the country.⁴ Recognizing the severity of the crisis, New Mexico’s Governor, Michelle Lujan Grisham, signed legislation in 2019 to create a task force dedicated to

³ Cecilia Nowell, *There’s an Epidemic of Missing Indigenous Women. One Mother Wants Answers About Her Daughter*, Washington Post, October 7, 2021, available at <https://www.washingtonpost.com/gender-identity/theres-an-epidemic-of-missing-indigenous-women-one-mother-wants-answers-about-her-daughter/>.

⁴ *New Mexico Missing and Murdered Indigenous Women and Relatives Task Force Report* (“Task Force Report”) (Dec. 14, 2020), available at <https://www.niwrc.org/resources/report/new-mexico-missing-and-murdered-indigenous-women-and-relatives-task-force-report>.

examining the issue and proposing solutions.⁵ The task force’s first report, released in December 2020, painted a troubling picture of the challenges in addressing MMIWG cases in New Mexico. It found that poor data collection practices and a lack of coordination between tribal, state, and federal law enforcement were significant obstacles to solving these crimes.⁶ Shockingly, out of 92 missing persons cases involving Native American individuals identified by the task force over a five-year period, only five had been solved.⁷ These findings underscore the urgent need for better systems and protocols to respond to and investigate MMIWG cases.

Also instructive is the story of Ella Mae Begay, a 62-year-old master weaver and beloved family matriarch from the Navajo Nation, who vanished from her home in the Sweetwater Chapter of the Navajo Nation on a June night in 2021.⁸ The night Ella Mae went missing, her daughter next door awoke to the sounds of an intruder breaking her door open. She hid in fear as the intruder rummaged through her home before leaving and heading in the direction of Ella Mae’s house. The daughter knew something was terribly wrong when she saw her mother’s truck speeding away shortly after and could not reach her by phone. Ella Mae would never drive that late at night. The daughter immediately called the police, but they did not respond. She called again, emphasizing the situation’s urgency, but it still took authorities about 20 minutes to arrive. This delay in response could have been critical—every minute counts when someone goes missing. A faster

⁵ New Mexico Indian Affairs Department, Missing & Murdered Indigenous Persons, <https://www.iad.nm.gov/programs-and-funding/missing-murdered-indigenous-persons/>.

⁶ Task Force Report at 8, 12, 36.

⁷ *Id.* at 20.

⁸ Colleen Sikora, FBI Offering \$5,000 Reward For Missing Navajo Woman, 12News, October 24, 2022, available at <https://www.12news.com/article/news/regional/native-america/fbi-offering-5000-reward-for-missing-navajo-woman/75-bdb9b328-9bc1-4d2e-afea-d76964142280>; see also Susan Montoya Bryan, US Judge Orders Man Held In Case Of Missing Navajo Woman, Associated Press April 7, 2023, available at <https://apnews.com/article/navajo-ella-mae-begay-disappearance-new-mexico-a774caa8709a5b2a6c580c3dd179ad91>.

reaction from law enforcement might have made a difference in the outcome of Ella Mae's case. However, like other tribal law enforcement, the Navajo Nation Police Department is severely under-resourced and understaffed, with only about 200 police officers covering 27,000 square miles.⁹

Desperate, Ella Mae's family mobilized search parties and implored authorities for aid, yet the investigation plodded forward. After nearly two years, federal prosecutors finally brought charges against Preston Henry Tolth, who confessed to assaulting Ella Mae and stealing her truck on the night she disappeared.

Ella Mae's case may have captured national attention, but it is not an isolated case. A comprehensive statewide study in Arizona found at least 160 indigenous women and girls were murdered between 1976 and 2018, and many more killings likely went unreported. For loved ones left behind the fight for justice is an uphill battle compounded by jurisdictional gaps, lack of resources, and the indifference of a system that has failed Native women for centuries.

Equally disturbing is the story of Melanie James, a 21-year-old Navajo woman from Farmington, New Mexico, who disappeared in the spring of 2014.¹⁰ Melanie was like a second mom to her younger sister, Melissa. When Melanie stopped responding to messages, Melissa and their mother, Lela Mailman, reported her missing to Farmington police. However, they felt the authorities did not take the case seriously, perhaps due to the family's Navajo heritage, their temporary homelessness, or Melanie's criminal record. The police investigation seemed

⁹ Paul Denetclaw, *New Navajo Nation Police Chief Wants to Hire More Officers*, Indian Country Today, January 11, 2022, available at <https://www.durangoherald.com/articles/new-navajo-nation-police-chief-wants-to-hire-more-officers/>.

¹⁰ Rachel Monroe, *Is There Hope for the Missing and Murdered Indigenous Women?*, The New Yorker, February 1, 2024, available at <https://www.newyorker.com/news/letter-from-the-southwest/is-there-hope-for-the-missing-and-murdered-indigenous-women>.

perfunctory—one report even got Melanie’s name wrong. It took three years for her to be entered into the national missing persons database. The local news refused to run a story, telling Mailman they were too busy, only to air a piece about a missing horse that evening. Despite potential leads from Melanie’s social media and around town, there was no progress. A decade later, her case remains unsolved. Mailman found solace in connecting at marches and rallies with other MMIWG families. She joined a protest for Ariel Begay, a Diné (Navajo) woman missing for three months before her body was discovered under a bridge in a still-unsolved case. The shared grief and purpose gave Mailman strength and a sense of community in the face of tragedy.

But even amidst this pain, there is hope. The proposed creation of a dedicated MEP event code represents a critical step forward. In many cases, the MEP event code could mean the difference between life and death by facilitating the rapid dissemination of information and galvanizing coordinated responses. For indigenous communities in particular, the MEP event code holds immense promise to help ensure that these cases are treated with the seriousness and urgency they deserve.

NPM strongly supports the Commission’s efforts and urges swift adoption of the MEP event code. At the same time, it is imperative that the rollout be coupled with comprehensive training for law enforcement and extensive community education and outreach to maximize its impact. Language barriers, cultural competency, and distrust born of historic mistreatment are issues to be considered. The shameful reality of missing and murdered indigenous persons is a stain on our collective conscience. Establishing the MEP event code, while not a panacea, would represent a powerful step towards honoring those we have lost with strong and meaningful action to protect those most vulnerable. NPM stands ready to work with the Commission, tribal

governments, other governments, and all stakeholders to address this crisis and build a future where every Native life is valued and safeguarded.

II. A Unique Event Code for Missing and Endangered Adults is Needed Because Neither the AMBER Nor Silver Alert Adequately Protects this Demographic.

The stark reality is that adults can and do go missing under dangerous circumstances every day. Whether due to cognitive impairments such as dementia or Alzheimer's, mental health crises, domestic violence, or other factors, these individuals are at grave risk of harm or exploitation. While the AMBER Alert has been instrumental in the safe recovery of numerous children, adult cases do not fit the strict criteria for AMBER Alerts. AMBER Alerts are limited to abducted children under the age of 18 and, therefore, fail to trigger any urgency or public attention for missing and endangered adults. The Silver Alert likewise fails to protect adults generally (and Native persons more specifically) because it is limited to missing older adults, usually over the age of sixty, with mental impairments. The assumption that younger adults without cognitive impairments have the capacity to protect themselves or remove themselves from dangerous situations is a dangerous fallacy. Age alone does not confer immunity from abuse, coercion, or the myriad of other threats that can lead to a person going missing against their will.

Moreover, the first hours and days after a disappearance are critical for a successful outcome. The longer a person remains missing, the more difficult it becomes to gather evidence and generate leads. Without an adequate emergency alert system, by the time a case garners significant attention, precious time has been lost. A dedicated EAS event code for endangered missing adults would help to activate the public and law enforcement in those crucial early stages. The proposed MEP event code would fill this critical gap, enabling the rapid dissemination of information and photos to media outlets, transportation hubs, and the public in a targeted geographic area. Like AMBER and Silver Alerts, these notifications could be pushed out via

television, radio, highway signs, cell phones, and other media, galvanizing entire communities to be on alert. The criteria for activating an MEP alert must require careful crafting to ensure the system is not overused or abused. Factors such as evidence of domestic violence, foul play, coercion, or other indications of acute risk could serve as guidelines. Support for tribal alerting authorities, training for law enforcement, and public education also will be critical to ensure the system's use is judicious and effective.

Fundamentally, this is about valuing the inherent dignity and worth of every human life, regardless of age, race, gender, or socio-economic status. A missing child rightly commands our collective concern and action, but a missing adult deserves no less. Their families and loved ones bear the same anguish, and the urgency to bring them to safety is no less profound. By establishing a unique EAS event code for missing and endangered adults, we send a powerful message as a society that these lives matter, and we are committed to leveraging every tool at our disposal to protect them. It is a recognition that vulnerability knows no age limit, and neither should our compassion nor resolve to act. The time has come to close this glaring gap in our public safety infrastructure.

The proposed creation of a unique EAS event code for missing and endangered adults, distinct from the existing frameworks for AMBER and Silver Alerts, is a necessary and overdue step to protect some of our most vulnerable citizens. While the AMBER and Silver Alerts have proven to be powerful tools in mobilizing responses to child abductions and missing elderly persons with cognitive impairments, they leave a significant gap when it comes to adults who find themselves in perilous situations. We urge the Commission to move swiftly to implement the MEP event code and give our missing and endangered adults the best possible chance to be found and brought home safely.

III. The Current Alert Infrastructure for Adults is a Quagmire that Demands a Uniform Federal Response.

The current patchwork of state-, tribal-, territorial-, regional-, and local-level alert systems for missing and endangered adults is a well-intended quagmire that demands the support of a uniform federal response. Disparate, uncoordinated approaches have created a landscape where the chances of a successful recovery often hinge on the happenstance of geography rather than the urgency of the case. The system fails the very people it is meant to protect, and it is time for a paradigm shift.

At the heart of the problem is the lack of a centralized, national framework for issuing and disseminating alerts for endangered adults. Unlike the AMBER and Silver Alert systems, which have been successfully deployed nationwide for missing children and the elderly, respectively, there is no equivalent infrastructure for adults who disappear under suspicious or dangerous circumstances. Instead, we have jurisdiction-by-jurisdiction systems, each with its own criteria, procedures, and limitations.

This unintended fragmentation has profound consequences. Foremost, the level of response and resources dedicated to a missing person's case can vary wildly depending on where the individual was last seen. Some jurisdictions have robust alert protocols in place, while others have barebones systems or none at all. This geographic lottery is a grave injustice to those whose lives are on the line and for their families. Moreover, the lack of uniformity makes sharing information and coordinating searches across jurisdictional lines extraordinarily complicated and challenging. Our public safety infrastructure must be equally agile in an era where people and threats can move seamlessly across jurisdictional boundaries. The current silos of information and resources are a severe hindrance to time-sensitive investigations.

Disparate systems also mean that reporting is inconsistent and incomplete. Without standardized criteria and protocols, crucial data points can be missed, delaying or derailing investigations. These voids hamper immediate search efforts and long-term trend analysis that could inform prevention strategies. The human costs of this dysfunction are incalculable. Every hour a search is delayed, every lead that falls through the cracks, every resource that isn't leveraged because of jurisdictional gaps or lack of intergovernmental cooperation—these are precious moments that can make the difference between saving a life and losing one. For families left to navigate this fractured landscape, the experience is often one of frustration, desperation, and a searing sense of abandonment by the very systems meant to serve them.

It does not have to be this way. IPAWS, which is already in place, can help address the fragmented and ineffective system of missing and endangered adult alerts across the country. Managed by the Federal Emergency Management Agency under the Department of Homeland Security, IPAWS is a modernized, integrated national alert and warning infrastructure designed to improve public safety by rapidly disseminating emergency messages to the widest possible audience through multiple communication channels.¹¹ By harnessing IPAWS, the same platform used for AMBER Alerts and other critical public safety notifications, the Commission can create a seamless network of communication and response.

IPAWS enables federal, state, tribal, territorial, and local authorities to alert their communities about serious emergencies from a single interface. In delivering critical information to the public, IPAWS leverages the Emergency Alert System, Wireless Emergency Alerts, the

¹¹ <https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system/public/myths-facts>.

National Oceanic and Atmospheric Administration Weather Radio, and other public alerting systems.

Under this paradigm, the MEP code established within EAS would provide a clear, consistent trigger for issuing alerts across all participating media outlets and platforms. Standardizing criteria for activation would be nationwide, ensuring a baseline level of urgency and response regardless of location. Critically, this system would be integrated with existing tribal, state, and local alert infrastructures, allowing for a cohesive, coordinated response. Rapid dissemination of information across jurisdictions also could efficiently pool and deploy resources. The Commission also could work with participating governments to develop best practices and training to ensure the use of IPAWS is effective and responsible. Over time, expanding this national framework to include a centralized database (to which tribes should be granted access) would provide a single point of reference for all missing adult cases. A database would be invaluable for active searches and retrospective analysis, allowing patterns and risk factors to be proactively identified and addressed.

The benefits of such a system would be profound. It would send a clear message that the safety and well-being of our missing and endangered adults—including MMIWG—is a national priority, not a regional afterthought. It would give families the assurance that every available resource is being brought to bear, regardless of where their loved one disappeared. And most importantly, it would save lives by ensuring that critical information reaches the right people at the right time. The current fragmented, ad hoc approach to missing adult alerts is a failure of our collective responsibility. It is time for bold, decisive action to bring our public safety infrastructure into the 21st century. By leveraging the power of IPAWS and establishing a dedicated MEP event

code, the Commission can lead this charge and build a system that truly leaves no one behind. The lives of our relatives—both indigenous and non-indigenous—hang in the balance.

IV. The Commission Should Encourage and Support Tribes to Become IPAWS Alerting Authorities.

The epidemic of missing and murdered indigenous persons, particularly women and girls, casts a collective trauma over tribal communities. Too often, these communities have felt powerless in the face of this crisis, grappling with jurisdictional gaps and complexities, resource constraints, failures of the federal trust responsibility,¹² lack of intergovernmental cooperation, a long history of violence and racism towards Native people, and a legacy of marginalization.

As sovereign nations, tribal governments hold the inherent right and responsibility to safeguard their citizens. NPM has seen the impact Tribes can have in instituting an adequate emergency alert system on their lands. When the Navajo Nation implemented its own AMBER Alert system, it took a bold step towards reclaiming control over the safety of its children.¹³ The Navajo Nation recognized that it could not rely on outside authorities to prioritize its needs, so it built its infrastructure to disseminate critical information within its communities rapidly. This is a model of empowerment the Commission should champion across all tribal nations.

To maximize the efficacy of the MEP event code, the Commission should delegate to its Office of Native Affairs and Policy (“ONAP”) the role of reaching out to tribes, encouraging them to assume the role of an IPAWS Alerting Authority for their respective jurisdictions, and providing the support they may need to do so. This Tribal engagement, grounded in a profound respect for

¹² Reaffirmation of the Federal Trust Responsibility to Federally Recognized Indian Tribes and Individual Indian Beneficiaries (August 20, 2014), *available at* <https://www.doi.gov/sites/doi.gov/files/migrated/news/pressreleases/upload/Signed-SO-3335.pdf>.

¹³ <https://www.amberadvocate.org/indian-country/navajo-nation-gets-amber-alert/>.

tribal sovereignty and self-determination, is about disseminating information and cultivating strong, respectful government-to-government relationships. By collaborating with tribal leaders, ONAP can understand their unique needs and concerns and help tailor the MEP event code to serve their communities best. The goal is not to impose a one-size-fits-all solution but to encourage tribes to embrace ownership of the MEP event code and adapt it to their unique needs and distinct requirements. Tribal engagement may include working with tribes to develop culturally appropriate alert criteria, providing training and resources for tribal law enforcement and emergency management personnel, and helping tribes and neighboring jurisdictions negotiate protocols for intergovernmental cooperation.

As the Commission's primary liaison to tribal governments, ONAP is uniquely positioned to lead this charge. ONAP has the relationships, the cultural competency, and the trust to engage with tribal communities effectively. ONAP's outreach should be integrated into a holistic strategy, utilizing the Commission's resources and partnerships to support tribes comprehensively. Ultimately, the efficacy of the MEP event code in Indian country hinges on the strength of the relationships and the depth of the trust between the Commission and tribal nations. Empowering ONAP to lead proactive, culturally responsive outreach sends a powerful message of federal commitment, affirming the Commission's unwavering support for Native communities in their efforts to save lives and prevent future disappearances and murders.

In implementing the proposed MEP event code, the Commission should task ONAP with a comprehensive outreach and education campaign to inform tribal governments about the opportunity to become IPAWS Alerting Authorities. This campaign should include clear, accessible guidance on becoming an alerting authority and technical assistance to help tribes navigate logistical or infrastructural challenges. Becoming an IPAWS Alerting Authority is just

one facet of addressing the urgent crisis of missing and murdered indigenous persons. Tribes require comprehensive support across multiple domains—from enhanced law enforcement training to expanded victim services and robust community education initiatives.

One powerful tool tribes can wield in this fight to save lives is the ability to originate their own emergency alerts through IPAWS. And the Commission should do all it can to facilitate and encourage this.

V. **The Commission Should Adopt a Vision and Values Statement to Underscore that the Rulemaking is Fundamentally About Human Beings, Not Just Technical Requirements.**

As part of the rulemaking process, it is essential that the Commission adopt a clear vision and values statement that underscores its unwavering commitment to the human beings at the center of this crisis. Accordingly, the Texas EquuSearch search and recovery vision and values statements provide an excellent model to build upon.¹⁴ Its unwavering dedication to returning the missing to their loved ones, its commitment to acting with integrity and compassion, and its emphasis on innovation and responsible stewardship—are the same principles that should guide the Commission as it takes on this critical work.

While some may argue that adopting a vision and values statement falls outside the FCC’s traditional scope, jurisdiction, or mandate, NPM believes that the gravity of the crisis demands a more expansive and holistic approach. The issue of missing and murdered indigenous persons is not merely a matter of technical requirements or regulatory oversight; it is a profound human tragedy that requires a response commensurate with its scale and urgency. This is not a matter of overreach but a recognition that the Commission’s work on this issue will have life-altering

¹⁴ <https://texasequusearch.org/about-us/>.

consequences for missing individuals and their families. In this context, anchoring the rulemaking process in a strong ethical and moral framework is not just appropriate but necessary.

Moreover, by adopting a vision and values statement, the Commission can help ensure that all governments and stakeholders involved in implementing the MEP event code—from broadcasters to law enforcement—operate from a shared set of principles and priorities. This can foster greater coordination, accountability, and effectiveness across the board, ultimately enhancing the system’s ability to save lives.

At its core, the Commission’s vision must be simple and unwavering: to bring every missing person home safely and to provide every family with the closure and solace they deserve. This is not a goal to be pursued halfheartedly or with caveats. It must be the unequivocal north star that guides every action and decision. To achieve this vision, the Commission must embrace a set of values that reflect the gravity and the urgency of this mission. Foremost among these is a fierce determination to never give up, to exhaust every lead, to leave no stone unturned until every missing person is accounted for. This will require resilience and tenacity that matches the relentless hope of the families who wait for word of their loved ones.

The Commission, state and tribal governments, law enforcement, and broadcasters, including NPM, must act with the utmost integrity, recognizing the trust placed in us by those we serve. This means being transparent in processes, accountable in actions, and unwavering commitment to the ethical and responsible use of the powerful tools at our disposal. It means treating every case with the respect and urgency it deserves, regardless of the circumstances.

Compassion must be at the heart of everything we do. For the families of the missing, the agony of not knowing is a weight that most can scarcely imagine. We must approach every interaction with these families with profound empathy and understanding, recognizing that our

work has the power to either deepen their anguish or provide a glimmer of hope. Our every action must be grounded in a deep sensitivity to their needs and pain.

As we build out the technical infrastructure of the MEP event code, we must commit to being on the cutting edge of innovation, harnessing the most advanced technologies and effective methodologies, and the most comprehensive training. These, combined, give every missing person the best possible chance of being found. It means being open to new ideas, new approaches, and new collaborations that can help us work smarter and faster.

Finally, we must recognize that this work is a sacred trust. The resources devoted to this mission—whether funds from donors, time from volunteers, or bandwidth from broadcasters—are a precious commodity we must steward with the utmost care and responsibility. We must be diligent and disciplined in our operations, always mindful of the faith that has been placed in us.

Adopting a vision and values statement along these lines would send a powerful message to all those involved in implementing the MEP event code—and, more importantly, to the families and communities depending on us. It would make clear that this is not just another bureaucratic exercise but a moral imperative that demands our fullest commitment and our deepest compassion.

Ultimately, the success of the MEP event code will be measured in the technical efficiency of MEP alerts and in the lives saved, the families reunited, and the communities made whole. By adopting a vision and values statement that places these human considerations at the forefront, we can ensure that every decision and action we take is in service of this higher calling. This is a moment for the Commission to lead—with its technical expertise and moral clarity. By enshrining our commitment to the missing and their families in a clear vision and values statement, the Commission can set the tone for a system that is not just efficient but truly compassionate. In doing so, we can help build a future where no one is left to wonder, to wait, or to grieve alone—a future

where every missing person has an entire nation behind them, working tirelessly to bring them home.

This statement should serve as a guiding light for all stakeholders involved in implementing the MEP code—from the Commission itself to the broadcasters, law enforcement agencies, and community organizations on the frontlines of this fight.

Even as the Commission navigates the technical complexities of this undertaking, it must never lose sight of the fundamental truth at the heart of this issue: this is about human beings, not just bureaucratic requirements. Every missing person is a story of heartbreak and uncertainty. Every family left to wonder and to wait is a testament to the unyielding power of love in the face of unimaginable adversity. These are not abstractions or statistics; they are mothers and fathers, daughters and sons, sisters and brothers, friends and neighbors. They are the fabric of our communities, and their absence leaves a void that can never be filled.

The Commission can set a powerful precedent and lead by example by stepping slightly outside its usual lane to adopt a clear statement of purpose and principles.

CONCLUSION

For the foregoing reasons, NPM urges the Commission to act swiftly in implementing an MEP event code.

Respectfully submitted,

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