

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

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

Comments of Alfred S. Kenyon, III

The following comments in support of the establishment of a Missing and Endangered Person (MEP) EAS Event Code do not reflect the opinion or guidance of any of my employers past or present. I offer these comments exclusively as a private citizen with considerable experience in broadcast engineering and through many years of volunteer work with EBS and EAS committees at various levels from local to national.

My past broadcast related emergency alerting experience over the last 50 years includes:

- Charter Member and Co-Chair, Kansas City Area Emergency Communications Committee
- Charter Member, Missouri State Emergency Communications Committee

- Supported the National Weather Service’s initial development and field testing of NOAA WRSAME system.
- Member, Cincinnati Area Tri-state Emergency Communications Committee
- Member, Ohio State Emergency Communications Committee
- Charter Member, and President, Primary Entry Point Advisory Committee
 - Served as an Advisor to the Board of Directors
- Vice Chair and Chairman, FCC EAS National Advisory Committee
- Served on the FCC Media Security and Reliability Advisory Committee and the FCC Commercial Mobile Service Alert Advisory Committee

As discussed in paragraphs 13-15 of the NPRM we are witness to an increasing number of public alerts issued by alerting authorities requesting public assistance leading to the successful, safe recovery of missing and endangered persons. In situations that do not meet established AMBER Alert criteria alerting authorities must select from the “Local Area Emergency (LAE)”, “Law Enforcement Warning (LEW)”, or “Civil Emergency Message (CEM)” Event Code for the message. None of these Event Codes are applicable to a missing and endangered person situation. Adoption of a Missing and Endangered Person (MEP) Event Code will relieve alerting authorities of confusion and concern over Event Code selection when faced with a situation where such public notification can make a positive difference.

When EAS alerts for missing and endangered persons are presented to the public via visual media the use of the proposed Missing and Endangered Person Event Code will support a cohesive message which will better support public comprehension and response. The current work-around using LAE, LEW, or CEM results in self-contradiction within the resulting EAS message which serves to decrease public understanding and response.

By providing a clear distinction between Missing and Endangered Person alerts and LAE, LEW, or CEM alerts, EAS Participants will be allowed to adjust the filters in their EAS devices to provide the level of action and response to incoming EAS messages that they deem appropriate for each situation based the needs of their community.

In paragraph 18, the Commission asks if additional content-rich data as may be available to support MEP messages via IPAWS message origination might be useful and of value to broadcasters and the public. It is important for all parts of the alert and warning system to continue to be forward-looking and include the capability to support rich media from origination to public facing delivery. We are on the brink of the rollout of next generation alerting capabilities supported by ATSC 3 television. Similar advances which support content-rich information may be available via HD Radio if reliable sources of rich media are available. We should not limit the future to what has been historically available.

The NPRM correctly acknowledges that Native communities have been disproportionately affected by missing person cases. Adoption of the dedicated MEP Even Code will benefit Native communities by providing an avenue for clear, cohesive messaging in missing person situations. As proposed, an MEP Event Code could properly support the over 50 different missing person situations that have been established by various jurisdictions across the country. I fail to see a benefit from fragmentation of that role by establishing one or more separate Event Codes reserved to support individual groups. Further I am concerned that establishment of a separate MEP Event Code may have an overall negative effect on EAS message distribution to the public by effectively enabling racial bias through EAS device filter setting. That would be a very sad situation indeed. Let's not make that possible.

In paragraph 30, the Commission asks about Wireless Emergency Alerts (WEA) and a Missing and Endangered Persons Event Code. Many of these questions may be addressed by the wireless service provider industry. Establishment of an MEP Event Code for EAS will drive alert origination software providers to accommodate MEP in their software and FEMA to add MEP to the list of supported Event Codes processed through IPAWS-OPEN. The Commission correctly noted that WEA does not directly recognize or use Event Codes. Wireless handset actions are determined by WEA message handling codes. Establishing an

MEP Event Code lays the groundwork for the wireless industry and the National Ashanti Alert Network Stakeholder Working Group to develop and recommend policy for how handsets might respond to a WEA message originated using an MEP Event Code.

Finally, I wish to join Chairwoman Rosenworcel in thanking Native Public Media, and especially Loris Taylor of Native Public Media, for spearheading this effort to establish a Missing and Endangered Person Event Code. Establishing the MEP and using MEP will help to address the missing persons crisis in Indian Country and across the rest of the nation.