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## Appendix IV

### Primary Entry Point Advisory Committee

April 3, 2003

Ms. Ann Arnold  
MSRC Government to Media Subcommittee  
C/o Texas Association of Broadcasters  
502 East 11th Street, Suite 200  
Austin, Texas 78701

Dear Ms. Arnold:

The PEPAC board would like to submit comments for your review in hopes that you may include some or all of them in your report on EAS.

We found the EAS survey conducted by the MSRC sub-committee chaired by Ann Arnold to be very informative. We believe this is the first EAS related survey of the individual states. We are grateful to Ms. Arnold and her staff for this monumental effort. While we were not surprised by many of the comments we are concerned by the uninformed and ambiguous answers from some of the states, in particular to last question of the series, which was specific to reception of a PEP station at the respective state EOC's.

The focus of our advisory group is on the PEP portion of the EAS and unfortunately has not included any involvement with planning on the state level. Currently, PEPAC does not have the resources, funding or mandate to do so. However, the PEPAC board recognizes that the PEP program depends very heavily on properly designed and operating state plans in order to deliver an EAN to the population. From the survey, it is clear that there are a few issues, which need to be addressed.

#### **The PEP Program**

The Primary Entry Point program was a successor to the BSPP program and was intended *only* as a last resort method for the President of The United States to communicate with the population in a national emergency. It was not intended to replace the then in-place wired network for national level EBS alerts. Thirty-three radio broadcast stations were chosen based on their coverage, distance from known nuclear targets, and cooperation of station management. The current PEP stations will cover the entire country during nighttime hours, presuming almost all other radio stations are off the air.

The reliability of the PEP system has been demonstrated by regular closed circuit testing conducted by FEMA. Failed links are discovered by the test and corrective action is taken promptly. PEPAC has specifically made the recommendation that FEMA should modify its testing procedures to include actual on-air testing. To date, the Agency has been reluctant to adapt the "all inclusive" system testing.

The PEP advisory committee has repeatedly attempted to secure approval to increase the number of PEP stations and the additional funding that would be required. However, the federal government has been unwilling to approve or fund expansion of the system. Even if the program is expanded, it is not intended to cover the entire country. It would be designed to provide sufficient coverage so that a PEP station could be received in at least one major city in each state. Currently this is not the case.

Limited by the inability to expand the current system, PEPAC developed a relationship with National Public Radio (NPR) to increase coverage into states where no PEP station can be received. NPR agreed to place an

EAS decoder/encoder on their satellite cue channel. As a result, states that are unable to directly monitor a PEP station, can make arrangements with their local NPR affiliated radio station(s) to forward PEP messages received on their NPR satellite downlink. PEPAC's intent is to utilize NPR as an alternative source and not as a substitution for the PEP station. PEPAC encourages all states to use the NPR station link in addition to a PEP radio station.

### **State Plans**

The PEP program depends heavily on well designed and operating state plans. Under the FCC rules, each state was to develop its own EAS plan and submit those plans to the FCC for approval. Unfortunately, little or no direction was given to the states and the Commission's staff accepted the plans apparently with out any significant or detailed review. Many state plans date back to the obsolete EBS program and were not redesigned to take advantage of the improved technology of the EAS. In many cases, the monitoring assignments are not redundant and do not take advantage of the web structure of the EAS protocol. Thus, a single station failure can cripple distribution of an alert through the state.

### **Conclusion**

The PEPAC board believes that if a reasonable effort were made, the majority of states would have reliable PEP alert distribution. This would include the use of quality, roof mounted AM loop antennas, and the adjustment of broadcast station monitoring assignments to include NPR as a source where necessary.

We would be happy to work with any state authority that desires to improve PEP operation in their state.

Sincerely,

Mark Manuelian  
President  
PEPAC