

## Annual Broadcast Employment Report Reinstated

The FCC has reinstated the requirement for broadcasters to file an annual employment report on Form 395-B in its *Fourth Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking* (FCC 24-18) in Docket 98-204. Form 395-B collects data from broadcast stations about the race, ethnicity, and gender of station employees within specified job categories. The requirement to submit Form 395-B was suspended in 2001 in the wake of two rulings from the U.S. Court of Appeals for the D.C. Circuit that called into question some of the FCC's practices about how the information collected on Form 395-B was used.

In its 1998 decision in *Lutheran Church-Missouri Synod v. FCC*, the court ruled that the FCC's EEO outreach regulations were unconstitutional. These rules had required comparison of the race and gender of a station's full-time employees

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## FCC Finds Illegal Transfer of Control at WPIX

The FCC has determined that Mission Broadcasting, Inc. and Nexstar Media Group, Inc., have engaged in the unauthorized transfer of control of WPIX(TV), New York, a station licensed to Mission, proposed the statutorily maximum forfeiture against each of them, and ordered them to take remedial steps to bring the station into compliance with the Commission's Rules. The Commission determined that Nexstar exercised de facto control of the station through a Local Programming and Marketing Agreement ("LPMA") between the two companies. As a result of this relationship, Nexstar acquired an attributable interest in WPIX and thereby exceeded the National Ownership Cap for the maximum national household reach that one entity can achieve. The Commission's findings are the product of investigations it undertook upon receiving complaints and responses it received from the parties to the agency's letters of inquiry. The Commission's basis for its decision is narrated in a *Notice*

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## Multilingual Alerting Proposed for EAS

In a *Notice of Proposed Rulemaking* (FCC 24-23) in Docket 15-94, the FCC has solicited public comment on its proposal to make the Emergency Alert System ("EAS") more accessible for people whose primary language is other than English. The Commission says that tens of thousands of messages are distributed via the EAS every year to alert the public to severe weather, natural disasters, and law enforcement warnings. Almost all of these alerts are released in English. According to Census Bureau data, there are over 26 million people in the United States who do not speak English very well or at all. The Commission states that implementation of this proposal would help realize its long-term priority to expand accessibility to EAS messages, including to those whose primary language is not English.

The FCC proposes to establish systems and processes for the distribution of EAS messages in 13 languages in addition to English, including Arabic, Chinese, French, German, Haitian Creole, Hindi, Italian, Korean, Portuguese, Russian, Spanish, Tagalog, and Vietnamese. If an EAS

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# Media Bureau To Clarify Digital FM Proposal

The FCC's Media Bureau has invited public comment on a Petition for Clarification concerning the Commission's proposal to change the methodology used by digital FM stations to determine whether they can increase FM digital power, and to allow asymmetric sideband operations. In a Public Notice (DA 24-154) in Docket 22-405, the Bureau explained that the National Association of Broadcasters ("NAB") and Xperi, Inc. had jointly filed a Petition for Rulemaking Addendum – Request for Clarification following the Commission's release of an *Order and Notice of Proposed Rulemaking* (FCC 23-61) last August.

The *Notice of Proposed Rulemaking* and the Commission's prior discussions about digital FM power levels have considered only the power level for the digital FM carriers of the primary HD Radio MP1 hybrid service mode of operation. The Commission has considered the total integrated power level for all digital carriers of the primary HD Radio MP1 hybrid service mode of operation. The petitioners note, however, that the HD Radio service is not limited to the MP1 mode standard hybrid service. The Commission has authorized extended hybrid modes of operation, which increase the number of digital subcarriers. The petitioners observed that the optimal operation of the extended hybrid modes requires an increase in the total integrated power above that of the MP1 mode so that all the digital carriers individually operate at the intended power. Otherwise, individual carriers would have to operate with less than the intended power level so as to prevent the total integrated power from exceeding the intended level. For this reason, the petitioners propose to clarify the maximum

digital FM power levels permitted for hybrid and extended hybrid service modes. They request clarifying language in the *Notice of Proposed Rulemaking* and textual modification of the proposed new Section 73.404(e) of the Commission's Rules.

The Media Bureau noted that the Petition does not refer to any technical studies of the impact of extended hybrid modes with a total integrated digital power level more than -10 dBc. The Bureau asks commenters to address the question of whether additional technical studies are needed to determine whether to adopt the petitioners' proposal. The Bureau seeks to learn the potential for interference to first-adjacent-channel analog FM stations, to the host analog station, or to other users of FM spectrum.

NAB and Xperi also asked the FCC to incorporate a reference in the rules to the National Radio Systems Committee's NRSC-5 standard as an appropriate means to implement the proposed change. The Bureau observes that incorporating standards from outside the agency into the Commission's rules is unusual. Therefore, it asks commenters to offer alternative means to incorporate the proposed clarification directly into the rules.

The Media Bureau requests additional comment on these questions in order to develop a complete record. To help determine the scope of this issue, commenters are encouraged to provide data about the number of stations operating in the extended hybrid modes, including whether those stations operate with a power level greater than -14 dBc.

April 1 is the deadline for filing comments. Reply comments will be due by April 15.

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## FM Channels Declared Vacant

The FCC's Media Bureau has issued an *Order* (DA 24-241) declaring vacant certain FM channels shown below that were previously occupied by authorizations that have been cancelled or long-form applications that have been dismissed. These channels have been returned to the FM Table of Allotments. They will be available for applications for new stations in one or more future proceedings.

COMMUNITY	CHANNEL	MHZ
North English, Iowa	246A	97.1
Colfax, Louisiana	267A	101.3
Calhoun City, Mississippi	272A	102.3
Battle Mountain, Nevada	253C2	98.5
Independence, Oregon	274C0	102.7
Huntington, Oregon	294C1	106.7
Monument, Oregon	280C3	103.9
Murdo, South Dakota	265A	100.9
Selmer, Tennessee	288A	105.5
Camp Wood, Texas	251C3	98.1
Cotulla, Texas	289A	105.7
Los Ybanez, Texas	253C2	98.5
Ozona, Texas	275A	102.9
Stamford, Texas	233A	94.5

# New EAS Event Code Proposed

The FCC has initiated a rulemaking proceeding to propose adoption of a new Emergency Alert System (“EAS”) event code – “MEP” – for Missing and Endangered Persons. This proposal was published in a *Notice of Proposed Rulemaking* (FCC 24-30) in Docket 15-94.

The EAS provides the vehicle to deliver thousands of emergency messages each year. EAS alerts are configured under the EAS Protocol, which uses fixed codes to identify the elements of the alert message so that each message can deliver accurate, secure and geographically targeted alert messages to the public. One of the elements of the code system is a three-character “event code.” The list of active event codes is found in Section 11.31(e) of the FCC’s Rules. This feature of the code describes the nature of the alert, whether about severe weather, a natural disaster, or a law enforcement warning, such as “CAE,” which stands for Child Abduction Emergency, otherwise known as an AMBER Alert (which is an acronym for “America’s Missing Broadcast Emergency Response”).

According to the National Crime Information Center, in 2022, approximately 187,000 adults who fall outside of the criteria for AMBER Alerts went missing in the United States. The new event code would bring the rapid notice capabilities of EAS to bear on the problems associated with finding missing persons. It would help to implement the objectives of the Federal government encoded in the Ashanti Alert Act. The Commission proposes to call alerts with the MEP event code “Ashanti Alerts.”

The Ashanti Alert Act was enacted in 2018 and named in honor of Ashanti Billie, a 19-year-old woman who was abducted in Virginia and found dead in North Carolina in 2017. The Act required a National Coordinator at the Department of Justice to establish a national communications network to provide assistance to regional and local search efforts for missing adults through the initiation, facilitation, and promotion of local elements of a network in coordination with states, tribes, units of local government, law enforcement agencies and other entities with expertise in providing services to adults. These efforts are directed toward finding missing adults who may suffer from physical or mental disability, who may be in physical danger, or whose disappearance may not have been voluntary.

On January 29, 2024, the National Ashanti Alert Network Stakeholder Working Group and the Pilot Project Participants Working Group noted that there was no current “one size fits all” approach to missing and endangered person alerts for adults. They asked the FCC to establish a dedicated alerting system event code for missing and endangered persons, i.e. “MEP.” This proceeding addresses that request.

The Ashanti Alert Act required the Department of Justice to designate a National Ashanti Alert Coordinator – the Bureau of Justice Assistance – to work with states and tribes to develop Ashanti Alert Network plans, establish voluntary guidelines for states and tribes, and to promote compatible and integrated Ashanti Alerts throughout the nation. The current system of Ashanti Alerts can provide for dissemination of information to law enforcement agencies, media, and the public about missing adults and suspects. However, these alerts are currently transmitted through a patchwork of notification systems subject to local laws that vary in each jurisdiction. This can result in delay of the dissemination of the information. The Commission anticipates that an EAS alert message with a MEP event code for missing and endangered persons would create uniformity in the alert process, and thereby assist the efforts to promptly locate missing individuals.

The Commission invites comment about whether EAS could accommodate missing and endangered persons alerts as effectively as it does other types of alerts. The agency asks whether there are constraints that would complicate or impede the ability of EAS to contain the necessary information for this type of alert. Among such constraints might be the two-minute limit on the length of the EAS message.

If this proposal is adopted, the Commission intends to require EAS participants and device manufacturers to implement the new code within 12 months of the effective date of the rule. It asks for comment on the feasibility of this timeframe for implementation.

The FCC invites public comment on this proposal within 30 days of the date of publication of notice of this proceeding in the Federal Register. The deadline for reply comments will be 60 days after that publication.



# DEADLINES TO WATCH



## License Renewal, FCC Reports & Public Inspection Files

April 1	Deadline to place EEO Public File Report in Public Inspection File and on station's Internet website for all nonexempt radio and television stations in <b>Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, and Texas.</b>	April 1	Mid-Term EEO review begins for certain radio stations in <b>Indiana, Kentucky, and Tennessee.</b>
April 1	Deadline for all broadcast licensees and permittees of stations in <b>Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, and Texas</b> to file annual report on all adverse findings and final actions taken by any court or governmental administrative agency involving misconduct of the licensee, permittee, or any person or entity having an attributable interest in the station(s).	April 10	Deadline to place quarterly Issues and Programs List in Public Inspection File for all full service radio and television stations and Class A TV stations.
		April 10	Deadline for noncommercial stations to place quarterly report regarding third-party fundraising in Public Inspection File.
		April 10	Deadline for Class A TV stations to place certification of continuing eligibility for Class A status in Public Inspection File.

## Lowest Unit Charge Schedule for 2024 Political Campaign Season

During the 45-day period prior to a primary election or party caucus and the 60-day period prior to the general election, commercial broadcast stations are prohibited from charging any legally qualified candidate for elective office (who does not waive his or her rights) more than the station's Lowest Unit Charge ("LUC") for advertising that promotes the candidate's campaign for office. Lowest-unit-charge restrictions are now or soon will be in effect in the following jurisdictions. Some of these dates may be subject to change.

STATE	ELECTION EVENT	DATE	LUC PERIOD
Connecticut	Presidential Primaries	Apr. 2	Feb. 17 – Apr. 2
Delaware	Presidential Primaries	Apr. 2	Feb. 17 – Apr. 2
New York	Presidential Primaries	Apr. 2	Feb. 17 – Apr. 2
Wisconsin	Presidential Primaries	Apr. 2	Feb. 17 – Apr. 2
Alaska	Dem. Pres. Primary	Apr. 6	Feb. 21 – Apr. 6
Hawaii	Dem. Pres. Primary	Apr. 6	Feb. 21 – Apr. 6
North Dakota	Dem. Pres. Primary	Apr. 6	Feb. 21 – Apr. 6
Wyoming	Dem. Pres. Caucus	Apr. 13	Feb. 28 – Apr. 13
Pennsylvania	Pres. & State Primaries	Apr. 23	Mar. 9 – Apr. 23
Rhode Island	Presidential Primaries	Apr. 23	Mar. 9 – Apr. 23
Indiana	Pres. & State Primaries	May 7	Mar. 23 – May 7
Maryland	Presidential Primaries	May 14	Mar. 30 – May 14
Nebraska	Pres. & State Primaries	May 14	Mar. 30 – May 14
West Virginia	Pres. & State Primaries	May 14	Mar. 30 – May 14
Kentucky	Pres. & State Primaries	May 21	Apr. 6 – May 21
Oregon	Pres. & State Primaries	May 21	Apr. 6 – May 21
Idaho	Dem. Pres. Caucus	May 23	Apr. 8 – May 23
Montana	Pres. & State Primaries	June 4	Apr. 20 – June 4
New Jersey	Pres. & State Primaries	June 4	Apr. 20 – June 4
New Mexico	Pres. & State Primaries	June 4	Apr. 20 – June 4
South Dakota	Pres. & State Primaries	June 4	Apr. 20 – June 4

Source: National Conference of State Legislatures

**DEADLINE TO FILE DISCLOSURE RE  
STATUS AS A FOREIGN MEDIA OUTLET**

**APRIL 11, 2024**



# DEADLINES TO WATCH



## Deadlines for Comments in FCC and Other Proceedings

DOCKET	COMMENTS	REPLY COMMENTS
(All proceedings are before the FCC unless otherwise noted.)		
Docket 22-405; Public Notice (DA 24-154) Digital FM	Apr. 1	Apr. 15
Docket 24-20; NPRM (FCC 24-2) Customer rebates for undelivered video programming		Apr. 8
Docket 24-14; NPRM (FCC 24-1) Priority processing of applications		Apr. 8
Docket 15-94; NPRM (FCC 24-23) Multilingual emergency alert messages	Apr. 8	May 6
Docket 24-85; NPRM (FCC 24-31) Satellite earth station regulatory fees	Apr. 12	Apr. 29
Docket 12-108; Public Notice (DA 24-276) Closed captioning display settings	Apr. 15	Apr. 25
Docket 15-94; NPRM (FCC 24-30) New alert event code for EAS	FR+30	FR+60

*FR+N means the filing deadline is N days after publication of notice of the proceeding in the Federal Register.*

## Paperwork Reduction Act Proceedings

The FCC is required by the Paperwork Reduction Act to periodically collect public information on the paperwork burdens imposed by its record-keeping requirements in connection with certain rules, policies, applications, and forms. Public comment has been invited about this aspect of the following matters by the filing deadlines indicated.

TOPIC	COMMENT DEADLINE
Antenna structure registration requirements, Sections 17.4, 17.48, 17.49	Apr. 15
3.7 GHz earth station relocation lump sum reimbursement elections	Apr. 19
Wireless microphones, Section 74.803	Apr. 29
Market definitions for TV must-carry elections, Section 76.59	May 3
Mid-term self-evaluation	May 6
Call sign reservation and authorization, Form 380	May 7
Closed captioning of IP-delivered video programming	May 7
Interference to radio astronomy, Section 73.1030	May 13



# Annual Broadcast Employment Report Reinstated continued from page 1

with the overall availability of minorities and women in the relevant labor force. The Commission used a broadcaster's employee data to assess its EEO compliance during the station's license renewal process. The court said that this pressured stations to engage in race-conscious hiring in violation of the equal protection guarantees of the Fifth Amendment to the U.S. Constitution. The court clarified that regulations which merely required stations to implement racially neutral recruiting and hiring programs would be permissible. The court did not address the propriety of the Form 395-B itself – but rather how the Commission used the data collected on the form.

Thereafter the FCC adopted new outreach rules which offered licensees two options for establishing an EEO program. One of these options required broadcasters to report the race and gender of each individual applicant for employment. The Commission then would examine the data about a station's applicant pool and investigate broadcasters with few or no minority applicants. In 2001, the D.C. Circuit again found that this regulation pressured stations to focus on recruiting minorities in its decision in *MD/DC/DE Broadcasters Association v. FCC*, and it vacated and remanded back to the FCC the entire recruitment regulatory scheme. Notably, the court again did not criticize the mere collection of employment data or the use or design of Form 395-B. Facing this latest remand, the FCC suspended its EEO rules in 2001, including Form 395-B, in order to evaluate what it should do next.

In November 2002, new race-neutral EEO rules were adopted which remain in effect at the present time. They included no references to the station's local labor force or applicant pool. However, the Commission deferred action on Form 395-B because it needed to incorporate new standards for classifying race and ethnicity data that had been adopted by the federal government's Office of Management and Budget. The Commission also reinstated a Note to Section 73.3612 of its Rules that had originally been adopted in 2000. The Note stated that employment data collected from broadcasters would be used exclusively for the purpose of compiling industry employment trends and making reports to Congress, and not to assess any aspect of a broadcaster's compliance with the EEO rules.

In 2004, the Commission adopted a revised Form 395-B and readopted the requirement for broadcasters to file it. However, that obligation remained suspended until the agency could explore the issue of whether employment data could or should remain confidential. The Commission has now resolved that question and in this *Fourth Report and Order* in this proceeding, the requirement for stations to file Form 395-B has been reinstated for the first time since 2001. The form will be filed online electronically and will be

available to the public. Reports are mandatory for all stations involved in an employment unit with five or more full-time employees. Stations with employment units of fewer than five full-time employees are exempt from the requirement to file Form 395-B.

To reinstate Form 395-B, the Commission relied heavily on the fact that the court's decisions in twice striking down its EEO rules did not find fault with the mere collection of data for statistical purposes. The FCC reiterated that data collected on Form 395-B will be used only for analyzing and reporting trends in the broadcast industry, and not for enforcement purposes. In the *Order on Reconsideration* component of this release, the Commission responded to a 2004 petition for reconsideration about the drafting of Section 73.3612 of its Rules. The Commission now has redrafted Section 73.3612 so as to move the restrictions on how employment data can be used from the Note where it had been placed in 2002, into the main text of the rule. Further, the Commission committed to promptly dismiss any petition, complaint, or other filing against a broadcast application or station that relies on data from Form 395-B as the basis for the petition, complaint, or other filing.

Despite substantial broadcaster opposition to allowing Form 395-B to be publicly available, the Commission decided to make them available. Three broad reasons that it listed for doing so included: (1) public disclosure will give stations incentive to be careful to report accurate data; (2) making data available maximizes its utility and benefit for the public; and (3) making data available bolsters the Commission's ability to analyze trends across different communications sectors, and aids in the production of the most meaningful reports.

There is a new data point that has not been included in the prior versions of Form 395-B. Commenters in this proceeding asked the Commission to incorporate in the form a mechanism for identification of non-binary gender categories. The Commission agreed to this request and has delegated the task of implementing such a change in the form to the Media Bureau.

All broadcasters required to file Form 395-B are to do so by September 30 each year. Any payroll period from the third quarter of the calendar year may be used as the basis for the report. For consistency, a station must use the same payroll period every year. The Media Bureau will provide more specific instructions for preparing and filing Form 395-B at a later date. The new version of the form must be approved by the Office of Management and Budget before it can be deployed.

In the *Second Further Notice of Proposed Rulemaking*, the Commission invited comment to refresh the record on the use of Form 395-A, which is used to collect employment data from multichannel video programming distributors.

# FCC Finds Illegal Transfer of Control at WPIX continued from page 1

*of Apparent Liability for Forfeiture (FCC 24-34).*

Nexstar previously owned WPIX, but divested it in connection with its 2018 agreement to acquire the Tribune Media Company. The Commission's Rules limit a single owner to attributable interests in stations that would cover not more than 39% of the television households in the United States. Acquisition of the Tribune stations would push Nexstar over the 39% threshold. Accordingly, it sold three stations, including WPIX. WPIX was sold to Scripps Media, Inc. However, shortly thereafter, Scripps sold the station to Mission.

Mission was able to pay for the station purchase with a revolving line of credit that it effectively shared with Nexstar. Under the joint credit facility, Nexstar and Mission each guaranteed repayment and provided its own assets as collateral to secure money borrowed by either party. With the assignment application for Mission's purchase of the station, Mission included an unsigned copy of the LPMA.

The LPMA was executed and implemented immediately upon the closing of Mission's purchase. Under the LPMA, Nexstar was to provide all of the station's programming and was entitled to receive all of the station's revenue. Although not subject to any written agreement, it later came to light that Mission had delegated to Nexstar complete responsibility to negotiate arrangements for retransmission consent. In determining whether any entity has de facto control of a broadcast station or licensee, the Commission investigates who controls policies concerning programming, personnel, and finances. Considering the totality of the circumstances in this case, the Commission concluded that Mission had ceded control of the station to Nexstar.

**Programming.** The LPMA gave Nexstar the right to program all of the station's airtime on its primary and all secondary streams. Mission retained the theoretical right to reject, substitute, refuse or preempt Nexstar's programming under certain circumstances. However, that right included the constraint that the substitute programming must be of equal or greater value to Nexstar. Determination of that value rested with Nexstar. Mission could be reimbursed for its effort only where an expense was deemed by Nexstar to be reasonable. In actuality, Mission had neither the staff nor the facilities to propose or produce any credible substitute programming. The Commission found it probative that while Mission had the right on paper to preempt or reject Nexstar's programming, it never exercised that right. Furthermore, the Commission noted the absence of any affirmative action on Mission's part to consult with Nexstar about programming or exert any influence over it. Most programming and the station itself were branded with Nexstar's logo. The station carried no visual or aural clues for the audience to discern who really was the licensee.

**Personnel.** Mission has two part-time staff members at WPIX. Nexstar hires and supervises all other employees, including at the management level. Nexstar recruits new hires and holds itself out to the community as the recruiter. Mission maintains only two employees at a major television station in the nation's largest market as compared to Nexstar's large staff on site performing all day-to-day

activities. The Commission said that it "stretches credulity" to believe that Mission personnel are controlling the station under these circumstances.

**Finances.** The Commission's investigation revealed that Mission receives no share of the station's revenue and has no economic incentive to control either the programming or the day-to-day operations. There is no profit-making potential for Mission. It may not even enjoy gain from appreciation of the station's value because Nexstar holds an option to buy the station for a price that is less than Mission paid for it. Hence, the station's finances are overwhelmingly controlled by Nexstar.

Management agreements pursuant to which a party operates a station on a day-to-day basis under the licensee's supervision are permissible. However, the Commission said that a licensee involved in such an agreement is not relieved of its duty to retain ultimate control – i.e., to mandate basic policies pertaining to the fundamental station operations of programming, personnel, and finances. The Commission explained that a licensee engaged in time brokerage or other sharing agreements must operate as a stand-alone discrete entity separate from the broker. It must be ready and able to operate the station independently of the programmer at any time it believes the arrangement does not fulfill its public interest responsibilities. The Commission concluded that in this case, Mission does not stand apart from Nexstar and does not have the capability to independently operate WPIX. Thus, the station is under de facto control of Nexstar.

Based on the totality of the circumstances in this case, the Commission concluded that Nexstar and Mission each violated Section 310(d) of the Communications Act and Section 73.3540 of the Commission's Rules by transferring de facto control of the station without FCC consent. For this violation that has continued for a lengthy period of time, the Commission proposes to fine each of them the maximum forfeiture permitted by statute of \$612,395.

Nexstar holds de jure attributable interests in television stations providing it with coverage of 39% of the TV households in the country – which is the maximum reach permitted for one owner. Acquiring de facto control of WPIX and the large tranche of television households in its market pushed Nexstar over the maximum limit. The FCC therefore concluded that Nexstar has violated the National Ownership Cap. The agency proposes to fine Nexstar an additional \$612,395 for this violation.

In addition to the fines, the Commission also ordered Nexstar and Mission to unwind their illegal relationship within 12 months of the earlier of the date of a forfeiture order in this proceeding or payment of the forfeiture. The parties may choose either of these options: (1) Mission divests WPIX to a completely separate third party unrelated to either Mission or Nexstar; or (2) Nexstar acquires from Mission legitimate de jure ownership of WPIX, accompanied by divestiture of other stations so as to stay under the National Ownership Cap for household reach.

Each party has 30 days in which to seek reduction or cancellation of the proposed forfeiture.

## Multilingual Alerting Proposed for EAS continued from page 1

participant broadcast station operates with one of these as its primary language, it would be required to transmit the alert in the same language. The same principle would apply to subchannels and multicast channels that operate primarily in a language other than English.

In the proposed system, a generic template alert message would be produced for each event code in each language. The EAS originator would originate an alert message just as it does now with the proper code for the event. The EAS participant would have prepared its EAS device to select the template appropriate to the event and in the desired language. The recorded template message would be accessed from local audio file storage or from a source connected by the internet. Having been recorded in advance, the template messages would necessarily be generic about the event in question, lacking the specific information, including such things as time or location of the dangerous event. Nevertheless, they would

provide the non-English speaking audience with a better source of emergency information than is now available.

The Commission has directed the Public Safety and Homeland Security Bureau to propose and seek comment on a set of emergency alert template messages in multiple languages for the wireless alert system. The Commission asks whether it should adopt a similar process for developing the multilingual EAS template messages.

The Commission assumes that participants' devices can be modified to accommodate and execute the proposed multilingual system with software updates at modest expense. The agency requests comment about the feasibility and cost of such software.

The FCC invites public input on the relative benefits and costs of the proposed system, as well as its feasibility. The deadline for comments is April 8. Reply comments must be filed by May 6.