

## Non-Substantive Change Request for Information Collection 3060-0207 – Emergency Alert System

The Federal Communication Commission (“Commission”) is submitting a non-substantive change request to the Office of Management and Budget (OMB) to add electronic reporting fields in the Alert Reporting System (ARS). The ARS was previously approved by OMB as a part of the Emergency Alert System (EAS) information collection, 3060-0207, which is approved through April 30, 2025.

Currently, the ARS form requires State Emergency Communications Committees (SECCs) to submit monitoring assignment information for all EAS Participants<sup>1</sup> in its jurisdiction. “Monitoring assignments” describe the paths by which messages must be distributed to transmit them from federal, state, and local governments to the thousands of EAS Participants for ultimate display to the public.<sup>2</sup> Monitoring assignments must describe the differences in how federal and state/local alerts are distributed,<sup>3</sup> including differences in distributing alerts using different technologies.<sup>4</sup> These monitoring assignments matrixes must be reported using the Commission’s seven designations to describe each entity’s roles in the alert distribution hierarchy.<sup>5</sup> The Commission reviews and approves these submissions to ensure that the SECCs have complied with all Commission regulations requiring resilient and redundant monitoring assignments to ensure government emergency alerts can always reach the public in the event of disasters. Accordingly, this process is critical to national public safety and emergency preparedness.

The change we submit today alters the organization of how the above information is collected to improve reporting clarity, accuracy, and consistency. We propose to add two new ARS field tables that will provide standalone “free form text” fields to optionally type in the monitoring assignment reporting for two of the seven designation categories– Primary Entry Points (PEPs) and State Relay Networks (SRNs). This will allow SECCs to enter relevant information for these entities in a more organized way that describes their monitoring assignments accurately without narratives or clarifications. Although the current ARS form already requires reporting of Primary Entry Point and State Relay Network data, it is often unclear to SECCs how and where to enter this data, and the data was being poorly captured by the existing ARS tables.

Unlike the other monitoring designation categories, there are no drop down selection options on the ARS form table for SECCs to specifically identify PEPs or SRNs. Drop down selection options for PEPs and SRNs were left off the ARS form tables due to the technical and legal differences between PEPs and SRNs and the other monitoring designation categories. Adding PEP and SRN drop down

---

<sup>1</sup> EAS Participants are the private entities that are required to comply with the Commission’s EAS rules, such as radio and television broadcast stations, cable television systems, satellite television service, and satellite radio service. 47 CFR §§ 11.2(b), 11.11(a)-(c).

<sup>2</sup> 47 CFR § 11.21(a)(4) (“A monitoring assignment matrix, in computer readable form, clearly showing monitoring assignments and the specific primary and backup path for the National Emergency Message (EAN)/Presidential Alert messages from the NPWS to all key EAS sources (using the uniform designations specified in § 11.18) and to each station in the plan, organized by operational areas within the state.”).

<sup>3</sup> 47 CFR § 11.21(a)(2) (“[T]he extent to which the state’s dissemination strategy for state and local emergency alerts differs from its strategy for the National Emergency Message.”).

<sup>4</sup> 47 CFR § 11.21(a)(4) (“If a state’s emergency alert system is capable of initiating EAS messages formatted in the Common Alerting Protocol (CAP), its EAS State Plan must include specific and detailed information describing how such messages will be aggregated and distributed to EAS Participants within the state, including the monitoring requirements associated with distributing such messages.”).

<sup>5</sup> 47 CFR § 11.18.

categories to the existing tables would have introduced even greater complexities and inaccuracies to the ARS form and data. Accordingly, reporting this information would usually require SECCs to add narrative “notes” to the table explaining the presence of PEPs and SRNs and their position in the monitoring hierarchy. The less narrative information SECCs include, the more open to different interpretations this information is, and the harder it is for future SECC or FCC officials to understand what was reported. Today’s solution of creating new, separate fields for PEP and SRN reporting is therefore the most efficient way to substantially improve the ARS form and SECC reporting.

The existing reporting table structure has required Commission staff to spend additional time explaining data entry to the SECCs, and SECCs have had to spend additional time completing their ARS submissions or making corrections to submitted data. Additionally, the reports that were ultimately filed in ARS would include this data in inconsistent ways. This lack of clear reporting has created additional time burdens for Commission staff to interpret what was reported, and additional burdens for SECCs to explain and clarify to Commission staff the meaning of what they reported. This change will therefore not only improve reporting clarity, accuracy, and consistency, but it will save considerable time for both the SECCs filing reports and the Commission staff reviewing these submissions.

As a result of this non-substantive change request, there are no increases in the burden hours and no costs are associated with information collection.