



Ms. Lisa Fowlkes
Deputy Chief, Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, NW, Room 7-C753
Washington, DC 20554

September 28, 2007

Subject: CMAS recognition of FM-based Broadcast Networks

Dear Ms. Fowlkes,

We are writing to submit a request for the CMAS to carefully consider FM-based broadcast networks for inclusion as a recognized platform and technology. The FM-based network and receivers coupled with wireless communications service providers would offer a robust, redundant and affordable approach to solving the traditional CMAS technology platform issues outlined in the CMAS assumptions. I am submitting this comment for the members of the Commercial Service Mobile Alert Advisory Committee prior to their meeting on Wednesday, October 3rd, 2007.

FM-based digital alert and messaging systems value proposition are targeted alerts and messages received on FM receivers and other mobile devices, including cell phones, PDAs, and other specialized receivers equipped with FM chips. FM-based incorporates Radio Broadcast Data System (RBDS) technology to send digital information using conventional FM radio infrastructure. Overlapping signals from different stations help to ensure that there is always a signal that can be received. Another added efficiency is that the system does not require reoccurring fees.

Specifically, a FM-based solution ALERT FM uses a dedicated and secured channel so that there is no possibility of public access to the network. In a crisis, ALERT FM has a guaranteed channel that offers protective umbrella coverage for certified command and controlled messages to be delivered with a guaranteed source all the way to the receiver.

It's a powerful, switch less solution because messages will not clog up existing switched wireless networks, and the broadcast signal is more robust than cellular signals. Cell phone subscribers are unaware that they are only an FM chip away from having the ability to receive real-time hazard and alert information – including NOAA weather, Amber Alerts and other local notifications.

Thank you for your consideration.

Best Regards,

A handwritten signature in black ink, appearing to read "Matthew Straeb".

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Alert FM Backgrounder:

In recent years, local emergency management personnel have used radio and television broadcast stations, cable and wireless cable systems along with land mobile radio and cell dispatches to distribute info to local responders. While the Department of Homeland Security along with State and Local emergency operation are working to provide organization and resources to promote the development of an improved platform for comprehensive and complete emergency alert messaging, the recent Minneapolis bridge collapse is a sobering reminder that the traditional communication systems simply don't hold up under catastrophic conditions.

Most people are still surprised when cell networks can't handle the extra load during emergencies. The reality is that cell phone networks are switched (point-to-point) and were not designed to handle the loads put on them today. Even more alarming is the lack of awareness that wireless carriers have the potential to further safeguard individuals and communities with the activation of a standard FM receiver chip that exists in most cellular handsets today which is capable of receiving personal alert messages from a standard FM radio tower used to listen to your favorite music. All this while not interfering with your normal cell phone usage.

The FM chip is one key to the interoperability of Global Security System's (GSS) FM-based digital alert and messaging system, ALERT FM. This single-to-multi-point radio broadcast system uses Radio Broadcast Data System (RBDS) subcarrier data casting, layered in "need to know" groupings based on an existing communication infrastructure – the country's nationwide FM broadcasting network. Targeted alerts and messages are delivered by satellite to FM transmission towers and can be received on ALERT FM receivers and other mobile devices, including Pads and other specialized receivers equipped with FM chips. Millions of Americans, including countless first-responders and public safety workers, have the potential to receive alerts and time critical information with the activation of the standard FM chip.

ALERT FM is a powerful switch-less solution because messages will not clog up existing switched wireless networks, and the broadcast signal is more robust than cellular signals. Overlapping signals from different stations help to ensure that there is always a signal that can be received. Another Alert FM efficiency is that the system does not require re-occurring fees. The radio broadcasters are stakeholders in providing emergency information and they have been doing this public service for over 50 years in communities across the country. Emergencies are local as is broadcasting. Therefore, the broadcasters are cooperating across the country to provide the spectrum to allow these life saving messages to be delivered.



As officials and the general public consider alternatives to cellular voice calls, text messaging is frequently discussed as a safe alternative during emergency situations. Text messaging, including applications based on Short Message Service protocol, is its own worst enemy during a perceived or real emergency. Network overload and inoperability are problematic, and there is also a security issue due to the dependence on internet connectivity to interconnect the communications channel. The cell network infrastructure is vulnerable connected to a maze of landline Telephone switches, and encryption is not supported all the way to the wireless receiver. In comparison, ALERT FM based on FM radio broadcast infrastructure uses a dedicated Satellite and secured channels so there is no possibility of public access to the network. In a crisis, ALERT FM has a guaranteed channel that offers protective umbrella coverage for certified command and controlled messages to be delivered with a guaranteed source and encryption all the way to the receiver.

As emergency communication channels continue to receive close scrutiny, the role of broadcasters will advance as the FM network infrastructure is considered to provide efficient and solid support for the vigorous delivery of time critical, life-saving messages.

FM networks are well positioned to address the dynamics of the future broadcast audio market. That said, the ALERT FM system will not conflict with the demand for more features on handsets, higher quality music players or feature-rich devices in increasingly smaller sizes. In fact, the projected music opportunities available on cell handsets over the next three years are an added plus for broadcasters and complements the deployment of ALERT FM.

Case in point, a legislative bill is in committee called the "Broadcasters First Responders Act" to protect the FM broadcasters fuel resources and other operating assets during the an emergency. To date, FM broadcaster's fuel was confiscated by local FEMA officials for their own use. This rendered the FM station useless even if the equipment was operable. This bill will ensure continuous audio and alert data from AlertFM when it passes in Congress later this session.

As broadcasters remain on the front lines of providing emergency information to their audiences, it's exciting for stations to be a part of the existing EAS (emergency alert system) as well as new initiatives designed to provide a more comprehensive solution for emergency communication. The deployment of GSS's ALERT FM gives first responders, the general public and broadcasters across the country a new opportunity to help safeguard their communities and expedite emergency communication during crisis situations.