Virginia Association of Broadcasters
Legal Review

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August 4, 2017

Legal Memorandum

EAS Nationwide Test Deadlines Established;
New Credentials Required For ETRS Filing Platform;
New EAS Operating Handbook

The FCC has announced the next nationwide EAS test (September 27 at 2:20 p.m. ET), has established the deadline (August 28, 2017) for filing "Form One" via the ETRS filing platform, is requiring all stations to establish new login credentials for ETRS, and has made available a new EAS Operating Handbook. In other words, there are plenty of EAS tasks to occupy broadcast stations during the dog days of summer! These EAS requirements apply to all broadcast stations, so please keep reading (and then make your EAS "to do" list!).

A.   Nationwide Test Scheduled for September 27

FEMA and the FCC have announced that a nationwide EAS test will be conducted at 2:20 p.m. ET on September 27. (The backup date, if needed, is October 4.) Stations should mark their calendars, ensure that EAS gear is functioning, assign responsibility for the filing of nationwide EAS test reports (the first of which is due August 28—more on that below), and print, review, and complete the FCC's new EAS Operating Handbook (more on that below).

To help stations begin to prepare now for the September 27 test, stations are encouraged to take the following steps:

- Review the station's state EAS plan;
- Ensure that a copy of the 2017 version of the EAS Operating Handbook (discussed below) is located at normal duty positions or EAS equipment locations and is immediately available to operators;
- Review the new EAS Operating Handbook to become familiar with and prepare for the actions that will need to be taken upon receipt of the test alert;

- Ensure that the station's EAS equipment operates in compliance with the Commission rules, such as being capable of receiving and processing the NPT (national periodic test) code and the "six zeroes" national location code;
- Upgrade, as needed, EAS equipment software and firmware to the most recent version;
- Re-register login credentials for the ETRS (EAS Test Reporting System) filing system and complete "Form One" for the station (see below for more information on these requirements) by August 28; and
- Manually synchronize EAS equipment clocks to the official time provided by NIST (the National Institute of Standards and Technology), if the station's equipment does not automatically synchronize to an Internet time source.

One of the most important preparatory steps referenced above is the requirement to re-register for ETRS login credentials and submit "Form One" by August 28, 2017, and more information on these steps is below.

As you review the material above and below and as you begin to consider your preparations for the September 27 nationwide EAS, please remember that **all broadcast stations are required to participate in the EAS** (the FCC no longer recognizes "non-participating" status for stations in the EAS rules). Accordingly, all stations must be prepared to participate in the nationwide test on September 27 (or, if necessary, on October 4).

B.   Obtaining New Credentials to Login to ETRS

Remember how you had to create a username and password last year in order to file your nationwide EAS test reports via the FCC's ETRS filing platform? Well, the FCC Staff has advised that those usernames and passwords do not work anymore! In fact, the FCC has released a Public Notice providing instructions as to how to re-register for ETRS login credentials. Now, credentials must be registered through the FCC's CORES platform, which is becoming the centralized database for login credentials for many (but not all) of the FCC's various filing systems. (CORES was originally home only to each licensee's FRN—FCC Registration Number—but has more recently been adapted to serve a greater functionality for credentialing of users for additional FCC filing purposes.) Rather than copy and paste the FCC's instructions for registering your new credentials, we direct you to the Public Notice itself, which is available at https://apps.fcc.gov/edocs_public/attachmatch/DA-17-620A1.pdf.

C.   "Form One" EAS Report Due August 28; "Form Two" EAS Report Due on Day of Nationwide Test; FAQs Attached to This Memorandum

You may recall from the 2016 nationwide EAS test that there are three (yes, three!) reports that must be filed by each station in connection with a nationwide EAS test. These reports must be filed electronically in the FCC's ETRS (EAS Test Reporting System) by certain deadlines established by the FCC. The first report—called Form One—is due by August 28 (with any updates and corrections due by 11:59 p.m. on September 27). This is the report that contains basic information about each station, including its transmitter location, EAS monitoring assignments, and make and model of EAS gear. If you still have a copy of last year's Form One report, you

may wish to refer to it while completing this year's Form One report (making certain, of course, to update any information that has changed in the interim). The second report—called Form Two—will be due by 11:59 p.m. on September 27, 2017. (Form Three will be due by November 13, 2017, and we will remind you later about that report.)

To reiterate, **Form One must be completed and filed by all broadcast stations via ETRS by August 28, 2017**. The FCC has also issued a series of Frequently Asked Questions ("FAQs") relating to ETRS, which includes a "prep sheet" for Form One. We strongly encourage stations to review the FAQs, which are attached to this memorandum.

D.   Stations Must Print, Review, and "Fill in the Blanks" of, the New EAS Operating Handbook

In late July, the FCC released a Public Notice announcing the issuance of a new EAS Operating Handbook for all broadcast stations. Until now, stations should have been using the 2016 edition of the EAS Operating Handbook. Stations must implement the use of the 2017 EAS Operating Handbook in time for the September 27, 2017, nationwide EAS test.

All broadcast stations should print the new EAS Operating Handbook and post it at the location of the station's EAS equipment. All prior versions of the EAS Handbook (including the 2016 version, the special 2011 nationwide EAS test version, and all other versions) are now outdated, superseded, and ripe for recycling. In addition, all stations should carefully review the 2017 EAS Handbook and take the opportunity to "fill in the blanks" where the Handbook gives stations the opportunity to do so—the FCC has made the 2017 EAS Handbook available as a "writable" PDF in an effort to facilitate each station's customization of the document. All station personnel involved in any aspect of EAS compliance—weekly and monthly tests; nationwide tests; state and local alerts; EAS logging; equipment procurement; etc.—should review the new EAS Handbook, contribute to the "filling in the blanks" process, and ensure that it is posted at the appropriate location(s). (Please Note: stations are not permitted to alter the existing content of the EAS Handbook, other than to complete the portions that are designed for station input.)

E.   Questions?

As you register for ETRS login credentials, as you complete Form One, and as you make other preparations for the nationwide EAS test (including the review and completion of the new EAS Operating Handbook), please consult with your EAS equipment manufacturer and the station's legal counsel for assistance with any questions.

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If you have any questions concerning the information discussed in this memorandum, please contact your communications counsel or any of the undersigned.

Stephen Hartzell, Editor

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ETRS FAQS

More information about ETRS and the nationwide Emergency Alert System (EAS) test can be found on the FCC's ETRS website at https://www.fcc.gov/general/eas-test-reporting-system.

General questions

How do I access ETRS?
ETRS can be found at https://fccprod.service-now.com/login_with_sso.do?glide_sso_id=10db4616dbb07200f2f2f6531f9619de&fcc_portal_link=etrs.

When is the 2017 nationwide EAS test?
The 2017 nationwide EAS test is scheduled for 2:20 p.m. EDT, September 27, 2017. The back-up date is October 4, 2017.

When is Form One due?
Form One is due on or before August 28, 2017.

When is Form Two due?
Form Two is due before 11:59 p.m. EDT on September 27, 2017.

When is Form Three due?
Form Three is due on or before November 13, 2017.

Which browser should I use when filing in ETRS?
It is recommended that filers use Chrome or Firefox when accessing ETRS. Occasional errors have been experienced by filers that use Internet Explorer.

Registration

How to I register an ETRS account?
To access ETRS this year, you need to register a FCC Username in our Commission Registration System (CORES) and associate your EAS Participant's FCC Registration Numbers (FRNs) to that Username. Filers that have already created a Username for use with another FCC system can use that same Username to access ETRS. You can register a Username at https://apps2.fcc.gov/fccUserReg/pages/createAccount.htm.

Can I use the ETRS-specific account that I created in 2016?
No. You will need to register a FCC Username in CORES.

Who needs to register and file in ETRS?
All EAS Participants are required to register an FCC Username and file Forms One, Two, and Three in ETRS.

I want to file for multiple stations. Should I file for them using the same FCC Username?
Yes. Starting in 2017, you can file for multiple FCC Registration Numbers (FRNs) using the same Username. To do so, you will need to associate all FRNs to your FCC Username in CORES. For further

information, please review the ETRS Registration Public Notice at
https://apps.fcc.gov/edocs_public/attachmatch/DA-17-620A1.pdf.

Can I register multiple accounts for the same EAS Participant?
Yes. Each user should register their own FCC Username. That Username will be able to file on behalf of
any FCC Registration Number (FRN) that is associated to it. A single FRN can be associated with many
FCC Usernames.

**When I associate my EAS Participant's FCC Registration Number (FRN) to an FCC Username,
will that Username be limited to filing in ETRS?**
No. Usernames that have an associated FRN can file on behalf of that FRN in all FCC applications and
edit all filings made on behalf of that FRN in ETRS. Please keep this mind when deciding which
individuals within your organization should have FRNs associated with their Usernames.

**I need an FCC Registration Number (FRN) to associate with my FCC Username for ETRS. How
do I get one?**
Every EAS Participant should already have an FRN. Please check with others in your organization to
obtain your FRN and Password. If you need additional assistance, please contact the FRN Help Line at
877-480-3201 (Mon.-Fri. 8 a.m.-6 p.m. ET).

I don't remember my FCC Registration Number (FRN).
Please contact the FRN Help Line at 877-480-3201 (Mon.-Fri. 8 a.m.-6 p.m. ET).

I don't remember my FCC Registration Number (FRN) password.
You may reset your FRN password using a link available at
https://apps.fcc.gov/coresWeb/publicHome.do.

I don't remember my FCC Username password.
You may reset your FCC Username password at https://apps2.fcc.gov/fccUserReg/pages/reset-passwd-identify.htm.

Filings the ETRS Forms

Do EAS Participants need to resubmit Form One?
Yes, all EAS Participants must submit a new Form One for their EAS equipment in 2017. However,
Form One data collected in 2016 will be used to pre-populate 2017 Form Ones.

**Are low power FM stations (LPFM) and small student radio stations (Class D) required to register
and file in ETRS?**
LPFM stations and Class D non-commercial educational FM stations are required to register and file in
ETRS.

**Are LPFM televisions stations that operate as television broadcast translator stations required to
register and file in ETRS?**
Analog and digital low power television (LPTV) stations that operate as television broadcast translator
stations are not required to register and file in ETRS.

**Are FM broadcast booster stations or translator stations that entirely rebroadcast the
programming of other local FM broadcast stations required to register and file in ETRS?**
FM broadcast booster stations and FM translator stations which entirely rebroadcast the programming of
other local FM broadcast stations are not required to register and file in ETRS.

Are satellite stations or repeaters of a hub station required to register and file in ETRS?
Analog and digital broadcast stations that operate as satellites or repeaters of a hub station (or common studio or control point if there is no hub station) and rebroadcast 100 percent of the programming of the hub station (or common studio or control point) are not required to register and file in ETRS. However, the hub station (or common studio or control point) is required to register and file in ETRS.

I have a broadcast station with multiple HD stations (HD2, HD3, etc.). Do I need to file separately for each HD?
Each EAS Participant should file a separate copy of Form One for each of its EAS decoders, EAS encoders, and units combining such decoder and encoder functions. For example, if you are filing for a broadcaster (or cable headend) that uses two units combining decoder and encoder functions, you should file two copies of Form One.

I need to correct an error. How do I update forms that I have previously filed?
You can update previously filed forms by visiting the record for that facility in ETRS. You can access that record by clicking on the My Filings menu option. All corrections must be submitted within thirty (30) days of the initial deadline.

I cannot yet file Forms Two and Three.
Forms Two and Three will be made available at the time of the nationwide EAS test, which is 2:20 p,m, on Wednesday, September 27, 2017.

Filing Form One

How do I pre-populate Form One?
Broadcasters can pre-populate Form One by completing the FRN and Facility ID fields. Cable systems can pre-populate Form One by completing the FRN and PSID fields.

The pre-populated data for my facility is incorrect.
EAS Participants that pre-populate Form One using a Facility ID number or a Physical System ID number are urged to review their pre-populated data to ensure accuracy. Outdated or inaccurate data fields that cannot be edited in ETRS are populated from the EAS Participant's filings in the Commission's Online Public Inspection File (OPIF). Accordingly, EAS Participants must ensure that their OPIF information is correct for it to appear accurately in ETRS. EAS Participants are urged to review Form One as soon as possible to allow sufficient time for possible OPIF corrections.

What is my Geographic Zone of Service?
Your Geographic Zones of Service are the geographic areas that your facility serves. To find your Geographic Zones of Service, review your state's EAS plan. Each state EAS plan organizes the state into several operational areas. Each operational area in which the facility provides service should be submitted as a Geographic Zone of Service.

My Geographic Zone of Service/operational area does not appear to be in the FCC's database.
If the operational area is not already in our database, you can add it to our database by clicking on the "Click here to add new geographic zones to the picker" link, which will let you type it in. Please enter it exactly as it appears in your state's EAS plan.

Should I submit the latitude/longitude of my studio or my antenna?
You should submit that latitude/longitude of your broadcasting antenna.

I've typed in latitude/longitude and the map is showing an incorrect location.
Please ensure that your latitude/longitude is in NAD83 and decimal format.

How do I convert my latitude/longitude to NAD83 and/or decimal format?
The Commission has tools on its website that can assist you. Please visit
https://www.fcc.gov/media/radio/dms-decimal.

How do I find my EAS designation?
Your station's EAS designation should be indicated in your state's EAS plan. Most EAS Participants will be Participating Nationals.

Where can I find my monitoring assignments?
Your EAS monitoring assignment can be found in your state's EAS plan. Typing the monitoring assignment's call sign into the Form One monitoring assignment fields will help you find the appropriate entry in our database. In addition, please ensure that your EAS equipment is monitoring these EAS sources.

My monitoring assignments do not appear to be in the FCC's database.
Type the first three characters of the monitoring assignment's call sign into the Form One monitoring assignment fields. If the correct call sign does not appear, click on the text under the Other Monitored Sources field that states "Is your Monitored Source missing? Click here to add a new Monitored Source." Please enter the monitoring assignments exactly as it appears in your state's EAS plan.

What is a waiver? Do I need a waiver?
Some EAS Participants may find that they have difficulty monitoring one or more of the EAS sources assigned by their state EAS plan. If those EAS Participants plan to monitor different EAS sources than those assigned in their state EAS plan, they must seek a waiver of the Commission's Part 11 rules regarding EAS Participants' monitoring obligations. EAS Participants that monitor the EAS sources assigned by their state EAS plan do not need a wavier and should choose "no" to answer the Form One question related to waivers.

How do I find out the make and model of my EAS equipment?
For assistance in finding the make and model of your EAS equipment, please contact your EAS equipment vendor.

How do I find out the software version of my EAS equipment?
For assistance in finding the software version of your EAS equipment, please contact your EAS equipment vendor.

How do I determine if our equipment is interfacing with FEMA's IPAWS?
To determine if your EAS equipment is interfacing with FEMA's IPAWS, contact your EAS equipment vendor.

I returned to an incomplete form after several hours, and I had to start over.
Please save your form data periodically by clicking the Save Draft button that is located at the bottom of each form. The current session time-out is 30 minutes.

State EAS Plans

I can't find my operational area(s) in my state's EAS plan.
If you have any questions about your state's plan, please contact your State Emergency Communications Committee (SECC) chair. If you cannot reach your state's SECC chair, please contact your state's broadcasters association.

I can't find a copy of my state's EAS plan.
Please contact your State Emergency Communications Committee (SECC) chair. If you cannot reach your state's SECC chair, please contact your state's broadcasters association.

Who is my state's SECC chair?
A list of State Emergency Communications Committee (SECC) chairs is available at https://www.fcc.gov/public-safety-and-homeland-security/policy-and-licensing-division/alerting/general/state-eas-plans. However, this list may need updating. If the contact information is inaccurate, please contact your state's broadcasters association.

Batch filing

How do I submit a batch filing?
Click on the Submit Batch Filing menu option. Download and complete the spreadsheet template. After you have completed the template, you can choose a test cycle on the batch filing page, upload your file, and submit it. You will receive an e-mail after your batch filing has processed. If corrections to your batch filing are needed, the e-mail will provide you with a link to a page that explains the corrections that you need to make before re-uploading the template.
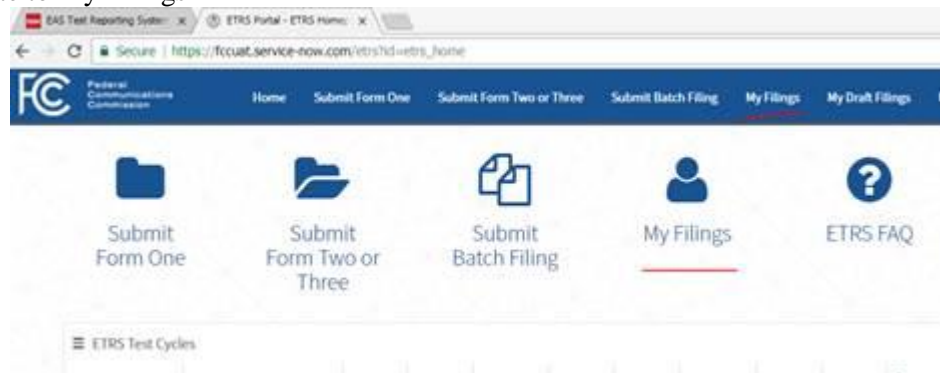
I received an error message when attempting to upload my spreadsheet.
Spreadsheet templates must be saved in .xlsx format before being uploaded to ETRS. Instructions for saving in the correct format can be found in the User Documentation available in ETRS. We also strongly recommend that spreadsheets be edited and saved in Excel or errors may occur.

Can I export my filing from last year?
Yes. Please follow these steps:

1. Login to ETRS Application
2. Navigate to My Filings

3. Navigate to 2016 EAS Test Records table
4. Click on the three lines (hamburger menu) next to "2016 EAS Test Records"

5. Click on Export in the format that you would like.

Further Questions

If you have a question that is not addressed in this FAQ, please e-mail that question to etrs@fcc.gov. The ETRS Team will respond to your question as quickly as possible. Please include your email and phone number so that the ETRS Team can follow up with you if necessary.

FORM 1 PREP SHEET

Below is a list of the information you will need to complete Form One. Please use this sheet to help gather the necessary Form One information before you sit down to file the form. If you have filed Form One in previous years, much of this information will be pre-populated once you complete the FRN, Facility ID, and/or Physical System ID fields.

Each EAS Participant should file a separate copy of Form One for each its EAS encoder/decoders. For example, if you are filing for a broadcaster (or cable headend) that uses two EAS encoder/decoders, you should file two copies of Form One. If your EAS Participant shares an EAS encoder/decoder with another EAS Participant, each EAS Participant should file its own copies of Form One for that EAS encoder/decoder.

- **FCC Registration Number (FRN)**

- **EAS Participant Type**
  Select from Radio Broadcaster, Television Broadcaster, Cable System, Wireless Cable System, Cable Reseller, Direct Broadcast Satellite, Satellite Digital Audio Radio Service, IPTV Provider, Wireline Video System, Other.

- **Facility ID**
  For broadcasters.

- **Call Sign**
  For broadcasters.

- **Physical System ID**
  For cable, IPTV, and wireline video providers.

- **City of License**

- **County of License**

- **State of License**

- **Legal Name of EAS Participant**
  This is typically the name of the licensee for which you are filing.

- **Owner of EAS Participant**
  If this EAS Participant is owned by a larger entity, you may provide the entity's name here.

- **EAS Equipment Make and Model**
  If your EAS Participant uses multiple types of equipment, please provide them all.

- **EAS Equipment Software Version**
  If your EAS Participant uses multiple types of equipment, please provide them all.

- **Community Unit IDs served by this equipment**
  For cable, IPTV, and wireline video providers.

- **EAS Designation**
  Please select all applicable EAS Designations for this facility. Most EAS Participants only serve as Participating Nationals. Please review your state's EAS Plan to determine whether any additional designations apply to your EAS Participant.

- **First EAS Monitoring Assignment**
  Your EAS Participant's first monitoring assignment can be found in your state's EAS Plan.

- **Second EAS Monitoring Assignment**
  Your EAS Participant's second monitoring assignment can be found in your state's EAS Plan.

- **Are either of these sources monitored pursuant to a Commission waiver?** Indicate whether the EAS Participant has been authorized to monitor sources other than those in its state EAS Plan. If these are the sources assigned by your state EAS Plan, select "no."

- **Other Monitored Sources**
  Your EAS Participant's other monitoring assignments can be found in your state's EAS Plan.

- **Does this equipment monitor FEMA IPAWS?**

- **Primary Language(s) in Service Area** Drop down choices or You can add additional languages after the first by clicking on the field again.

- **Geographic Zones of Service**
  In your state EAS Plan, you will find that your state is divided into several operational areas. Please enter the operational area(s) to which your EAS Participant provides service.

- **Transmitter Latitude (NAD83)**
  Please provide the facility's latitude using the North American Datum of 1983 in decimal format.
  Enter the latitude and the longitude of your EAS Participant`s antenna that transmits emergency alerts to the public. Latitude and longitude are accepted in Decimal Degrees. If you need to convert your latitude or longitude from Degrees Minutes Seconds or NAD27, click here.

- **Transmitter Longitude (NAD83)**
  Please provide the facility's longitude using the North American Datum of 1983 in decimal format.

- **Transmitter City**
  If your EAS Participant's transmitter is not located within a city or other municipality, enter "N/A."

- **Transmitter County**

- **Transmitter State**

- **Receiver Address Line 1**
  Please enter the location of the antenna that your EAS Participant uses to monitor for emergency alerts transmitted by other EAS Participants.

- **Receiver Address Line 2**
- **Receiver City**

- **Receiver County**
- **Receiver State**

- **Receiver Zip Code**

- **Filer First Name**
- **Filer Last Name**

- **Filer Phone (Ex: xxx-xxx-xxxx)**
- **Filer Mobile Phone (Ex: xxx-xxx-xxxx)**

- **Filer Email**
- **Filer Alternate Email**

- **Filer Address Line 1**
- **Filer Address Line 2**

- **Filer City**
- **Filer Zip Code**

- **Is this person the EAS Participant's Day of Test Contact?**

- **Day-of-Test Contact (DoTC) First Name**
- **DoTC Last Name**

- **DoTC Phone (Ex: xxx-xxx-xxxx)**
- **DoTC Mobile Phone (Ex: xxx-xxx-xxxx)**

- **DoTC Email**
- **DoTC Alternate Email**

- **DoTC Address Line 1**
- **DoTC Address Line 2**

- **DoTC City**
- **DoTC State**

- **DoTC Zip Code**