

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In re the Petition of	)	
	)	
The Independent Spanish Broadcasters	)	
Association, the Office of the United Church of	)	EB Docket No. 04-296
Christ, Inc., and the Minority Media	)	
Telecommunications Council	)	
	)	
For Immediate Interim Relief	)	
	)	
	)	
To: Office of the Secretary		

**JOINT COMMENTS OF THE  
NAMED STATE BROADCASTERS ASSOCIATIONS**

**NAMED STATE BROADCASTERS ASSOCIATIONS**

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Dated: May 28, 2014

## Summary

The Named State Broadcasters Associations are pleased to continue their participation in this proceeding. They are the boots on the ground in the various States, the District of Columbia and the Commonwealth of Puerto Rico, often working directly with the state and local emergency management authorities in their respective jurisdictions.

The Commission should continue its active role in reviewing and approving the various State EAS Plans. That rule-based practice provides an important nexus of mutual cooperation between the state and local emergency management authorities on the one hand, and the Federal government on the other hand. The practice also reflects the fact that those emergency management authorities, and not the Federal government, are the ones with intimate knowledge of the varied histories, geographies, demographics and resources of the local communities they deal with on a daily basis, as well as of the unique types of natural disasters and other emergencies to which their local communities are subject. Accordingly, the Commission's longstanding practice of deferring to those authorities is not only warranted; it is also, the State Associations believe, broadly appreciated by those authorities.

For those reasons, it is critical that the Commission obtain from the state and local emergency management authorities their necessary input to help the Commission evaluate MMTC's proposals. To better assure such input, the State Associations urge the Commission to consider hosting the same type of meetings that NASBA, with the NAB's help, has sponsored over the years with state emergency management personnel in order to learn from those authorities whether and how a "designated hitter" approach might work within the jurisdictions over which they preside.

The State Associations also note that on April 30, 2014, the Committee on Homeland Security of the House of Representatives approved, by a voice vote, H.R. 3283 which, among

other things, contemplates the establishment of a special committee that will include the FCC and will examine “recommendations for improvements to the system, including...[how to] alert and warn individuals...with limited English proficiency.” The State Associations believe that the findings of that expected committee should be made a part of the record in this proceeding and taken into consideration before the Commission takes any action with respect to the issue of multilingual EAS alerts.

Conducting a second National EAS Test should be the federal government’s top priority for fear that multilingual EAS alerting may complicate matters at a time when “getting it right” in English should be the first priority of our nation.

The State Associations strongly oppose, for First Amendment and other reasons, the imposition of any direct, or indirect, requirement that an English language radio or television broadcast station air emergency information in a language other than in English, or for that matter, that a foreign language radio or television station air emergency information in a language other than the language of its general format.

The State Associations do support the concept of “designated hitter” compacts in which station licensees choose *voluntarily* to enter into formal or informal arrangements with each other, under which one station would agree to provide emergency information coverage also in the language of the other station, in the event that the other station’s on-air operations were interrupted during an emergency. For that reason, MMTC’s proposal does warrant careful consideration by the various state and local emergency management authorities, working with their local broadcasters and other communications providers to determine the feasibility of such compacts on a voluntary, case by case basis.

## TABLE OF CONTENTS

	<b><u>Page</u></b>
Summary .....	i
Introduction .....	2
Discussion .....	4
A. Critical Involvement of and Commission Deference to State and Local Emergency Management Authorities .....	4
B. EAS Alerts Delivered in Languages Other than English .....	5
C. Non-EAS Emergency Information Delivered in Languages Other than English .....	9
Conclusion .....	12

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Alabama Broadcasters Association, Alaska Broadcasters Association, Arizona Broadcasters Association, Arkansas Broadcasters Association, California Broadcasters Association, Colorado Broadcasters Association, Connecticut Broadcasters Association, Florida Association of Broadcasters, Georgia Association of Broadcasters, Hawaii Association of Broadcasters, Idaho State Broadcasters Association, Illinois Broadcasters Association, Indiana Broadcasters Association, Iowa Broadcasters Association, Kansas Association of Broadcasters, Kentucky Broadcasters Association, Louisiana Association of Broadcasters, Maine Association of Broadcasters, MD/DC/DE Broadcasters Association, Massachusetts Broadcasters Association, Michigan Association of Broadcasters, Minnesota Broadcasters Association, Mississippi Association of Broadcasters, Missouri Broadcasters Association, Montana Broadcasters Association, Nebraska Broadcasters Association, Nevada Broadcasters Association, New Hampshire Association of Broadcasters, New Jersey Broadcasters Association, New Mexico Broadcasters Association, The New York State Broadcasters Association, Inc., North

Carolina Association of Broadcasters, North Dakota Broadcasters Association, Ohio Association of Broadcasters, Oklahoma Association of Broadcasters, Oregon Association of Broadcasters, Pennsylvania Association of Broadcasters, Rhode Island Broadcasters Association, South Carolina Broadcasters Association, South Dakota Broadcasters Association, Tennessee Association of Broadcasters, Texas Association of Broadcasters, Vermont Association of Broadcasters, Virginia Association of Broadcasters, Washington State Association of Broadcasters, Wisconsin Broadcasters Association, and Wyoming Association of Broadcasters (collectively, the “State Associations”), by their attorneys in this matter, hereby submit their Joint Comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice released March 11, 2014, in the above-captioned proceeding.<sup>1</sup>

### **Introduction**

In complementing the outstanding work of the FCC, the Federal Emergency Management Agency (“FEMA”), the National Weather Service (“NWS”), the National Association of Broadcasters (“NAB”), the Public Television Service (“PBS”), National Public Radio (“NPR”), the various state and local management authorities, as well as many others in the area of the Emergency Alert System (“EAS”), the State Associations are equally committed to EAS. They have boots-on-the-ground in each of the fifty States, the District of Columbia and the Commonwealth of Puerto Rico, working often times directly with state and local emergency authorities regarding the important life-saving issues involved with EAS. The EAS-related mission of the State Associations is to ensure that the tried and true, one-to-many communications architecture of the nation’s radio and television broadcasters continues to be

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<sup>1</sup> See Comment Requested To Refresh The Record in EB Docket No. 04-296, On Petition Filed By The Minority Media and Telecommunications Council Proposing Changes To Emergency Alert System (EAS) Rules to Support Multilingual EAS And Emergency Information, Public Notice, EB Docket No. 04-296, DA 14-336 (rel. March 11, 2014) (“Public Notice”).

viewed as a highly reliable, efficient and invaluable “First Informer” communications tool that helps to save lives and property, as well as to speed recovery efforts. For these reasons, the State Associations are pleased to offer their collective comments in response to the Commission’s Public Notice.

In the Public Notice, the Commission’s Public Safety and Homeland Security Bureau (the “Bureau”) seeks to update the record with respect to the above-captioned Petition (the “Petition”) filed by the Independent Spanish Broadcasters Association, the Office of Communications of the Church of Christ, Inc. and the Minority Media and Telecommunications Council (individually and collectively, “MMTC”). Through its Petition, MMTC has “sought changes to the Commission’s Emergency Alert System (EAS) rules to ensure that populations that do not speak English as a primary language will have access to readily understandable EAS alerts and non-EAS emergency information,”<sup>2</sup> including “information about how and where to evacuate, where to find medical assistance, food and shelter, how to locate loved ones, and when it is safe to return home.”<sup>3</sup> To achieve that objective, MMTC urges broadcasters to work with state and/or local emergency management authorities “to prepare an emergency communications plan that contemplates reasonable circumstances that may come to pass in the wake of an emergency.”<sup>4</sup> In addressing MMTC’s Petition, as supplemented by MMTC’s Ex Parte Letter, the Commission poses numerous questions in its Public Notice. The State Associations, through these Joint Comments, seek to assist the Bureau in examining the issues pertinent to MMTC’s Petition. The State Associations are in agreement with MMTC that broadcasters should

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<sup>2</sup> *Id.*, at 1–2.

<sup>3</sup> *Id.*, at 2, n.3.

<sup>4</sup> See MMTC Ex Parte Letter, EB Docket Nos. 04-296 and 06-119 (filed December 12, 2013) (“MMTC Ex Parte Letter”).

continue to work closely with their state and local emergency management authorities in order to help protect lives and property.

### **Discussion**

#### **A. Critical Involvement of and Commission Deference to State and Local Emergency Management Authorities**

The Commission has long recognized the critical role that state and local emergency management authorities play in the area of emergency communications. In reviewing and approving State EAS Plans, the Commission acknowledges and honors the perspectives and insights of all state and local emergency management authorities throughout the country.<sup>5</sup> Given the deep familiarity and appreciation of those authorities regarding the varied histories, geographies, demographics and resources of the local communities they deal with on a daily basis, as well as their experience and local knowledge of the unique types of natural disasters and other emergencies to which their local communities are subject, the Commission's longstanding practice of deferring to those authorities is not only warranted; it is, the State Associations believe, broadly appreciated by those authorities.

The insights and perspectives of state and local emergency management authorities are no less needed as the Commission considers MMTC's Petition. The Commission's review and approval of State EAS plans provide an important nexus among critical stakeholders, emphasizing the need for mutual cooperation not just between state and local emergency management authorities and the broadcast and other related-communications industries, but also between the Commission and other Federal authorities and those state and local emergency management authorities. Thus it is imperative that the Commission continue to involve state and local emergency management authorities as full partners in this process whose interests and

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<sup>5</sup> See Public Notice, at 8 n.40.

views must undoubtedly be taken into due consideration to ensure that our nation has the most robust and effective nationwide EAS possible. For that reason, the Commission should not withdraw from its role in reviewing and approving State EAS Plans.

The National Alliance of State Broadcasters Associations (“NASBA”) recently conducted a survey of the State Associations (the “NASBA Survey”). The results of the NASBA Survey showed that none of the State EAS plans currently address the issue of multilingual EAS alerting. Thus, the Commission needs to understand the priorities, concerns and resources of the various state and local emergency management authorities on the issue of multilingual EAS and other emergency messaging. The State Associations submit that MMTC’s proposal cannot be adequately evaluated without the full input and support of those state and local emergency management authorities.

#### **B. EAS Alerts Delivered in Languages Other than English**

In its Petition, MMTC draws an important distinction between EAS alerts and non-EAS emergency information. Federal, state and local emergency management authorities, including Weather Service personnel, are the primary originators of EAS alerts. Broadcast stations at this time have no ability to dictate when an EAS originator issues an alert, what the EAS alert states, or what language the EAS alert originator uses. As has always been the case, broadcast stations simply pass along what comes through the “daisy-chain.” This is how the EAS system has been designed and implemented since the days of CONELRAD.

EAS alerts are originated from FEMA and the NWS,<sup>6</sup> as well as from state and local emergency management authorities throughout the United States. The broadcast industry has no

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<sup>6</sup> The NWS is “a component of the National Oceanic and Atmospheric Administration,” which is ultimately part of the Department of Commerce. *See* NATIONAL WEATHER SERVICE, *About NOAA’s National Weather Service*, <http://www.weather.gov/about>.

control over those organizations or the content of their alerts. Accordingly, if the Commission believes that EAS alerts need to be given in languages other than English, the FCC should devote its considerable resources and prestige to convincing FEMA and the NWS, as well as state and local emergency management authorities, to make EAS alerts available in languages in addition to English. The NASBA Survey that was conducted demonstrated that the vast majority of EAS alerts originate from the NWS. Accordingly, if the Commission were able to convince the NWS to make its EAS alerts available in other languages in addition to English, any multilingual EAS alerting objective that the Commission may believe is warranted should be accomplished to a very high degree.<sup>7</sup>

In order to best ensure adequate input from state and local emergency management authorities as it relates to MMTC's proposal, the Commission should also consider sponsoring meetings among the various federal, state and local emergency management authorities in Washington, D.C. It is contemplated that MMTC would attend and make a presentation on its proposal. Those meetings would certainly assist the Commission and others to better understand the views of those authorities and improve the knowledge of all of us on the subject of

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<sup>7</sup> The State Associations believe that the NWS's input is critical to properly resolve these issues, and is hopeful that the NWS will file comments or replies in this proceeding. It should also be noted that in the brief comments it filed in this proceeding FEMA did not commit the Federal government to originating EAS alerts in any language other than English:

"FEMA supports the work of MMTC to extend alerting to the non-English speaking population. The US IPAWS Common Alerting Protocol Profile specifically includes specified means and methods to propagate alert information received with multiple language versions to privately held broadcast, cable and commercial mobile service providers for delivery to members of the public using their systems. Alerting Authorities (AA) may originate alert messages in the language that they prefer for consumption by the public or other public warning dissemination and distribution methods. However, AAs should understand that some EAS encoder/decoder products may have limitations in Text-to-Speech conversions to languages other than English and compose messages intended for Text-to-Speech accordingly. During the course of conveying alert and warning messages FEMA does not alter, edit or translate the contents of any messages. In fact messages are digitally signed by authorized originators to ensure that no changes occur."

See Comments on Behalf of Federal Emergency Management Agency Integrated Public Alert and Warning System Program Management Office, EB Docket No. 04-296 (filed March 31, 2014).

multilingual EAS alerts.<sup>8</sup> It would also help the Commission to determine whether any, and if so what, initiatives may be warranted.

For a number of years, the State Associations, through NASBA and with the help of the NAB, sponsored an annual, one-day, meeting of State emergency management authorities in the Washington, D.C. area, in an effort to promote a better understanding of the value of EAS and the role that broadcasters play in disseminating EAS alerts to their listeners and viewers. Those meetings are a matter of public record before the Commission.<sup>9</sup> The State Associations note with appreciation that FCC staff members made very helpful presentations during those meetings. The meetings were a great success, and the State Associations, through the good offices of NASBA and the NAB, would be pleased to work with the Commission in urging state and local emergency management representatives to participate in any future EAS-focused meetings.

The State Associations also urge the Commission to continue to work closely with Congress as it considers the many issues relating to EAS, including specifically multilingual alerting. In that regard, the State Associations note that on April 30, 2014, the Committee on Homeland Security of the House of Representatives cleared by a voice vote H.R. 3283 which is a proposal to amend the Homeland Security Act of 2002 to direct the Secretary of Homeland Security to modernize and implement the national integrated public alert and warning system to

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<sup>8</sup> For example, the NASBA Survey showed that the use of Common Alert Protocol (“CAP”) was not widespread. *See* Public Notice, at 6, 9 (asking about “the extent to which CAP-based alerting systems have been deployed”). A meeting of stakeholders in Washington would allow the FCC to probe state and local emergency management authorities to determine the reasons why CAP is not used more often.

<sup>9</sup> *See, e.g.*, Joint Comments of the Named State Broadcasters Associations, EB Docket No. 04-296, at 4 (filed March 15, 2010) (discussing the Sixth Annual EAS National Summit); Joint Comments of the Named State Broadcasters Associations, EB Docket No. 04-296, at 5-8 (filed April 21, 2006) (discussing the Second Annual Summit on the Emergency Alert System and Emergency Communications); Joint Comments of the Named State Broadcasters Associations, EB Docket No. 04-296, at 2-3 (filed January 24, 2006) (discussing the first such summit of state leaders and the intent to hold a second summit).

disseminate homeland security information and other information.<sup>10</sup> H.R. 3283 notes that “effective public alert and warning will require an integrated national network for reliable, secure, and authentic dissemination of emergency alerts and warnings by Federal, State, local, and tribal entities that are authorized to issue alerts to the public.”<sup>11</sup> The bill requires that an advisory committee, called the Integrated Public Alert and Warning System Advisory Committee, be created within 90 days of the enactment of the bill.<sup>12</sup> Notably, the Commission’s Chairman is the first person listed as a member of that committee.<sup>13</sup> The bill further provides that meetings of the Advisory Committee will be open to the public<sup>14</sup> and that the committee is to consider “recommendations for improvements to the system, including . . . [how to] *alert and warn individuals . . . with limited English proficiency*.”<sup>15</sup> Therefore, the State Associations urge the Commission, once the legislation becomes law, as is likely, and the committee is inaugurated, to use the committee’s deliberations and findings to augment the record in this proceeding in order to better inform itself and all participants on the issues relating to multilingual EAS alerting and multilingual non-EAS emergency information.

The State Associations also urge the Commission to consider giving priority to conducting another National EAS test while continuing to solicit the views of state and local authorities on multilingual EAS alerts. There should be no genuine dispute that making sure that the nationwide EAS alerting system is reliable in English is the top EAS priority.

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<sup>10</sup> See U.S. House of Representatives Committee on Homeland Security, *Committee Action*, April 30, 2014, available at <http://docs.house.gov/meetings/HM/HM00/20140430/102152/HMKP-113-HM00-20140430-SD001.pdf>.

<sup>11</sup> Integrated Public Alert and Warning System Modernization Act of 2013, H.R. 3283, 113th Cong. § 2(5) (2013) (hereinafter referred to as “IPAWS”).

<sup>12</sup> *Id.*, at § 526(d)(1).

<sup>13</sup> *Id.* at § 526(d)(2)(A).

<sup>14</sup> *Id.* at § 526(d)(4)(C).

<sup>15</sup> *Id.* at § 526(d)(7)(D)(ii) (emphasis added).

### **C. Non-EAS Emergency Information Delivered in Languages Other than English**

The issue of making non-EAS emergency information available in languages in addition to English cannot be separated from the issue of multilingual EAS alerts. The State Associations note that a key ingredient of H.R. 3283 is the provision of training programs for government officials on how to use the public alert system more effectively.<sup>16</sup> The State Associations are in complete agreement that more and better training of government officials in the use of EAS is imperative even under the English-only EAS alerting system. Suffice it to say that adding a foreign language capability to EAS alerting can reasonably be expected to make EAS alerting significantly more complicated.

The issues that would be expected to confront emergency management authorities at the federal, state and local levels, if EAS alerting were made available in a multilingual format, are likely to include at least some of the same issues that English language radio or television broadcasters would have to confront if they were required to, or chose voluntarily to, broadcast emergency information in a language in addition to English. One issue that the Commission has acknowledged is the matter of resources. State and local authorities, as well as English language broadcast stations, would in effect have to employ, or have under contract, perhaps several people on call who could be counted upon to become immediately available, on very short notice, either to accurately translate existing English language emergency-related material into a particular foreign language, and/or to create their own emergency-related information materials in a particular foreign language that are accurate and timely.

A related issue concerns whether an English language station that is airing emergency information in a non-English language may face special liability risks for whatever content is

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<sup>16</sup> *Id.* at § (d)(7)(D)(v).

broadcast. Would the Commission require the station licensee to monitor the non-English language broadcasts using extra station employees or contractors who fully understand the non-English language being used to broadcast the emergency information? Would an English-language station licensee's current liability insurance policy cover such non-English language broadcasts, and if so, what would be the added cost for such insurance, either in terms of increased premiums and/or the added expense of third-party monitoring? Conversely, would the Commission contemplate granting immunity to the licensee for inappropriate non-English content that may otherwise lead to potentially significant fines? The State Associations acknowledge MMTC's suggestion that English language stations could simply allow employees of a Spanish language station to use their airwaves if the Spanish language station may become inoperable during an emergency. However, the possible availability of such persons does not in and of itself address or resolve the liability/cost factors mentioned above.

Another set of issues involves determining what non-English languages would be used by an English language station to air emergency information. Would a station licensee whose station is located in an area that includes listeners/viewers who speak a variety of different foreign languages be required to select one or multiple languages, and at whose discretion? On the flip side, would a foreign language station be required to provide emergency information in the English language as well?

There is also a technical issue relating to multilingual EAS alerts that needs to be addressed. With the exception of the EAN alert code (Emergency Action Notification, the "Presidential Code"), EAS alert messages are limited to two minutes in length, and a follow-up EAS alert in a different language, using the same alert code, would be kicked out of the system as duplicative and would not be relayed. If separate, sequential EAS alerts are issued, with the

second alert in a non-English language, the second, jettisoned EAS alert would be of no informational value.<sup>17</sup> If, on the other hand, two languages are used in the same EAS alert, content will be compromised by the need to, essentially, incorporate two alerts, in two different languages, into a single two-minute message.

As a non-technical concern, there is the risk of causing confusion to regular listeners of English language stations where a foreign language broadcast may appear out of the blue. If those listeners or viewers tuning into their regular English language stations hear an EAS alert or emergency information in another language, they could very well become confused and either shut off their radio receivers or television sets or change to a different English-language station. In that scenario, the provision of multilingual EAS to the few will have harmed, rather than helped, the provision of timely and accurate emergency information to the greatest number of people.

The State Associations firmly believe that every broadcast station licensee should remain free, without any governmental directive, to select the language of its general format and to broadcast material of all types, including emergency information, in that language, as well as in any other language it may voluntarily choose to air.<sup>18</sup> Accordingly, the State Associations strongly oppose any imposition of a direct, or indirect, requirement that an English language radio or television broadcast station air emergency information in a language other than in English, or for that matter, that a foreign language radio or television station air emergency

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<sup>17</sup> See Public Notice, at 7 (discussing these concerns).

<sup>18</sup> The State Associations are very concerned that if the FCC were, directly or indirectly, to require broadcasters to air emergency information in a specific language, such a requirement would violate their First Amendment rights. Under the Communications Act, and long-standing FCC precedent, broadcast stations are free to select their own formats and the language they use to broadcast. See The Media Bureau of the Federal Communications Commission, *The Public and Broadcasting: How to Get the Most Service From Your Local Station*, at 12, available at [http://fjallfoss.fcc.gov/edocs\\_public/attachmatch/DA-08-940A2.pdf](http://fjallfoss.fcc.gov/edocs_public/attachmatch/DA-08-940A2.pdf) (revised July 2008) (“we do not ... advise stations on . . . format.”).

information in a language other than the language of its general format. The State Associations would regard any Commission-imposed obligation that a station report, at renewal time or otherwise, whether it broadcasts emergency information in a language other than the language of its general format, as an “indirect” requirement to be avoided.<sup>19</sup> Such reporting would be tantamount to the government imposing a direct speech requirement in violation of a station’s First Amendment rights.<sup>20</sup>

The State Associations fully support the concept of “designated hitter” compacts in which station licensees choose *voluntarily* to enter into formal or informal arrangements with each other, under which one station would agree to provide emergency information coverage also in the language of the other station, in the event that the other station’s on-air operations were interrupted during an emergency. For that reason, MMTC’s proposal does warrant careful consideration by the various state and local emergency management authorities, working with their local broadcasters and other communications providers to determine the feasibility of such compacts on a voluntary, case by case basis.

There is no one-size-fits-all formula to address the issue of multilingual dissemination of emergency information, and the Commission should not attempt to regulate the language used in EAS alerting or non-EAS emergency communications.

### **Conclusion**

The State Associations respectfully urge the Commission to adopt the positions advanced herein. The State Associations remain committed to working with the Commission and all other

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<sup>19</sup> See Public Notice, at 8 (describing MMTC’s “understand your role” suggestion).

<sup>20</sup> See *Lutheran Church-Missouri Synod v. FCC*, 154 F.3d 487, 491 (D.C. Cir. 1998) (“it is clear that the regulations [imposing a “reporting” condition] *do* effectively oblige the Church to implement racial preferences in its hiring decisions.”).

pertinent organizations to ensure continued improvements in the nation's emergency alert system for the benefit of all residents of the United States.

Respectfully submitted,

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