

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)
Wireless Emergency Alerts	)
Amendment of Part 11 of the Commission's Rules	) PS Docket No. 15-91
Regarding the Emergency Alert System	)
Modernization of the Nation's Alerting Systems	) PS Docket No. 15-94
	)
	) PS Docket No. 25-224

REPLY COMMENTS OF INTERNATIONAL DEAF EMERGENCY

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SUMMARY

International Deaf Emergency replies to the forty-three attachment-bearing comments it reviewed in this round. None of them opposes any of IDE's four proposals, one is affirmatively supported, and the principles IDE's allies filed support each of them. IDE asks the Commission for the following.

First, alerting that does not depend on a sense the recipient does not have. The record now contains a federal originator's own deployment of graded attention signals, USGS's three-level Android Earthquake Alerts, which differentiates in sound and in light but leaves touch carrying no graded meaning and switched off altogether at the highest level. IDE asks for the same design rendered in touch and light as deliberately as it is in sound, standardized so that it means the same thing on every device.

Second, symbols that are validated before they are mandated, by shape and pattern rather than by color alone, with Deaf and DeafBlind participants in the validation.

Third, an affirmative, authenticated, accessibly presented all-clear, and delivery that reaches DeafBlind recipients, including a specified tactile pathway and refreshable braille interoperability.

Fourth, photosensitivity safety limits on every flash feature, which no comment in the round addresses, including the two comments that promote flash features.

Fifth, on the Commission's CAP authentication proposal, a rule that says what a receiver must do when verification fails, rather than answering all five failure conditions with the single word reject. IDE offers its own incident as the notable case the Commission asked for: twenty-six genuine county and parish alerts, from twelve alerting authorities, that IDE's receiver could not authenticate for twenty-five days because it held one of FEMA's two issuing intermediates. IDE asks for the requirement with five companions, among them a versioned FEMA trust bundle, logged and reportable verification outcomes, and a rejection that is not silent to the people in the alert area.

Sixth, on timing, thirty-six months rather than forty-eight, with obligations sequenced inside the window rather than the window lengthened, and a data-triggered retirement of the 90-character limit with a specified graceful truncation.

Seventh, that text-to-speech and audio enhancements be adopted together with their non-auditory equivalents, and that software-based EAS be authorized with a capability boundary that protects accessibility tools outside the air chain. IDE's requested actions are listed in Section IX.

International Deaf Emergency (IDE) is a Deaf-led 501(c)(3) nonprofit that has worked in disaster risk reduction for sixteen years, from establishing the first accessible humanitarian camp after the 2010 Haiti earthquake, with the Red Cross and Water Mission, to disaster-risk-reduction training across six countries. Its president, who signs these reply comments, is Deaf. IDE's opening comments describe a draft Three Senses Alerting Standard: one alert, rendered in touch, light and sound, so that no recipient depends on a sense they do not have. It is written for any system that alerts people, in a building, on a television, on a handset, or in any application, and for the general public as much as for any particular disability; the standard's value to a hearing user in a loud room and to a Deaf user asleep is the same value, obtained the same way. IDE's current technology workstream, Deaflare, is the Deaf, hard-of-hearing and DeafBlind application of that standard, in its testing phase and free to use. IDE works with FEMA's IPAWS program under a Memorandum of Agreement signed August 25, 2026; under that agreement FEMA has assigned IDE Collaborative Operating Group 120193 in the IPAWS test environment. IDE filed comments in this proceeding on August 31, 2026 (ECFS Filing 26110073861). IDE has read the attachment-bearing comments discussed below and replies to them here.

I. No comment among the forty-three IDE reviewed opposes IDE's four proposals, one drew express support, and the principles IDE's allies filed support each of them.

IDE's opening comments asked the Commission for four things: a small, tested vocabulary of hazard-family vibration cadences, so that touch can identify the danger rather than merely announce one; delivery requirements that reach DeafBlind users, including interoperability with refreshable braille displays; an affirmative, authenticated, accessibly presented all-clear; and photosensitivity safety limits on every flash feature. IDE reviewed forty-three attachment-bearing filings responsive to the Further Notice: twenty-four retrieved from ECFS as the record in these dockets stood on September 3, 2026; the joint recommendations of the American Council of the Blind, the American Foundation for the Blind, and Bridge Multimedia Corporation, filed August 28, 2026 and retrieved September 11, 2026; the four attachment-bearing filings disseminated between September 4 and September 14, 2026, retrieved September 14, 2026, none of which uses the terms tactile, haptic, vibration, braille, photosensitivity, seizure, DeafBlind, or all-clear; and the fourteen remaining attachment-bearing comments of the original round, retrieved and read on September 14, 2026, of which eleven likewise use none of those terms. IDE states the following as verified facts about those forty-three filings, not characterizations. IDE does not represent that set as every comment filed in the round, and express comments filed without an attachment are outside the review. No comment IDE reviewed proposes that different hazards carry different vibration or haptic patterns. The comments that use the word "vibration" at all use it to call generally for "a recognizable vibration or haptic pattern" (Accessibility Organizations Comments at 7), to describe today's single

standardized pattern (AG Comments at 8), to state originator control over the cadence (NWS Comments at 2), to list a fallback presentation (DAS Comments at 26), and to ask that devices "provide an effective vibration cue together with equivalent visual and text information, with usable pathways for DeafBlind users" (ACB, AFB, and Bridge Multimedia Comments, Topic 6). One comment IDE reviewed asks expressly that alert content reach DeafBlind people by a tactile route: the American Council of the Blind, the American Foundation for the Blind, and Bridge Multimedia ask that where an alert carries a map or other graphic, the presentation supply "equivalent accessible information through an appropriate audio, text, sign-language, braille, tactile, or other supported pathway" (id., Topic 7). IDE supports that request and asks the Commission to give it a specified channel. No comment IDE reviewed proposes an affirmative all-clear presentation: NYCEM's all-clear proposal concerns the originator-side delivery mechanism, and the ACB, AFB, and Bridge Multimedia recommendation that accessible presentation "distinguish an initial alert, an unchanged repeat, a material update, a cancellation, and an expired alert" (id., Topic 3) states the need without specifying how the release should be presented. No comment IDE reviewed mentions photosensitivity, seizure risk, or any safety limit on screen or LED flash, including the two comments that promote flash features. Within the forty-three filings IDE reviewed, no comment opposes any of the four proposals, and the DeafBlind proposal is affirmatively supported.

They also follow from principles IDE's allies did file. The Accessibility Organizations (TDIforAccess, Deaf Equality, the National Association of the Deaf, the DHH-RERC at Gallaudet University, the Hearing Loss Association of America, Deaf Seniors of America, the American Council of the Blind, Perkins School for the Blind, the American Foundation for the Blind, accessSOS, and Communication Service for the Deaf) ask that any text-to-speech or auditory enhancement be accompanied by "equivalent non-auditory features" (Accessibility Organizations Comments at 2), and state the governing test: "equivalent visual and haptic features should provide members of the represented communities with an equally immediate indication of the emergency", including "a recognizable vibration or haptic pattern, immediate presentation on the lock screen, and compatibility with accessible wearables and other connected devices" (id. at 7). They then name the failure that test must overcome: "A vibration may occur but be indistinguishable from an ordinary notification." (id. at 9). IDE supports each of these requests, and offers the missing artifact: a vibration pattern can only be "recognizable" if there is a standardized, learnable vocabulary of patterns to recognize. A single generic buzz that says "something is happening" cannot deliver an "equally immediate indication of the emergency" when the spoken equivalent names the hazard. IDE's hazard-family cadence vocabulary is one concrete form of the coalition's own principle, offered as such, and IDE asks the Commission to read the two filings together.

The Attorneys General of eighteen states, the District of Columbia, and the City of New York establish the same point from the audio side: "the audio cadence itself does not communicate to individuals who are blind or low vision what the nature of the emergency is or what action should be taken" (AG Comments at 8). That finding is symmetric. Today's single WEA vibration pattern communicates to a Deaf user exactly as little as the audio cadence communicates to a blind user: that something, of unstated kind and unstated severity, is happening. The AGs also name DeafBlind residents repeatedly and observe that the audio attention signal is "not a feature that likely captures their attention" (id. at 5), yet every remedy their letter builds out is visual or auditory. The tactile channel, the only handset output that depends on neither sight nor hearing, is where the residents they name can actually be reached, and IDE's DeafBlind proposals close the gap their letter opens. IDE made the parallel point to the Commission in the NG911 direct-video proceeding in reply comments filed September 3, 2026 (PS Dockets 21-479 and 13-75, ECFS Filing 26110075390): in record after record, DeafBlind people are named as a constituency and left without a specified channel.

The National Weather Service supplies the mechanism: "An AO must possess the explicit capability to enable or disable attention-getting signals and vibration cadences on an update-by-update basis." (NWS Comments at 2). NWS treats the attention signal and the vibration cadence as controllable, per-message parameters, and asks to tag "which alerts should include a tone or be silent or not present at all" (id. at 1). Nothing in the alerting architecture makes the cadence untouchable. What is missing is only a standardized vocabulary worth controlling, which is what IDE asked the Commission to open a consensus standards path toward.

II. NYCEM's concern about unrecognized signals is answerable, and it has least force in the channel Deaf recipients depend on (FCC 26-38 ¶¶ 83-86).

NYCEM urges the Commission not to adopt a unique earthquake alert tone, reasoning from siren research that "unique alert signals alone do not convey new meaning to the public" and warning that hazard-specific tones could dilute public recognition of the current WEA alert tone and cause greater confusion in an emergency (NYCEM Comments at 10, para 24). IDE takes the concern seriously and does not read NYCEM's filing as inconsistent: paragraph 24 objects to a hazard-specific AUDIO tone, and paragraph 25 asks for a generic visual cue, and a party may hold both views. But NYCEM's proposal confirms the need IDE is addressing. In paragraph 25, NYCEM asks the Commission to require an opt-in visual alerting option that "will cause a mobile device's screen to flash in cadence when a WEA is received", calls it "especially useful for members of the Deaf and Hard of Hearing community," and concludes that "the addition of this feature would be simple, and the impact on accessibility would be enormous" (id. at 10, para 25). IDE supports that request by name. A cadenced, non-audio attention channel whose

accessibility impact is "enormous" is precisely the channel IDE proposes; the difference between the two filings is only whether that channel carries the one fact a Deaf recipient cannot otherwise obtain without reaching, waking, and reading the device, which is the family of danger. NYCEM's confusion concern is the right objection to that difference, and it should be answered rather than waived: by a bounded vocabulary rather than an open one, by rendering standardized in the rule rather than left to each device, by public education on the same footing the Commission already gives the WEA tone, and by the user testing IDE is organizing and offers to the standards process.

First, the word "alone" carries NYCEM's entire sentence, and IDE agrees with it. IDE's opening comments pair every signal with a symbol and an action-first plain-language instruction; in IDE's framework the attention channels carry the facts of emergency, severity, and hazard family, while the protective action always travels in language selected by the originator. Nothing in IDE's proposal rides alone, so a finding about signals alone does not reach it.

Second, the siren studies NYCEM invokes are studies of an audible channel among hearing users, for whom the signal is a doorbell and the message is a glance away. For a Deaf user asleep with the phone face down, and for a DeafBlind user at any hour, the vibration is not a doorbell before the message; it is the only pre-attentive channel that exists, and whatever it fails to say, the alert has failed to say. The AGs' semantic-emptiness finding (AG Comments at 8) applies to today's single pattern in full. The choice is not between a meaningful signal and a well-recognized one: the current pattern is well recognized and empty.

The proliferation objection resolves the same way. CTIA supports standardized symbols precisely because a discrete, consistent set "prevents proliferation of symbols that might dilute the impact of key emergency notifications" (CTIA Comments at 7). IDE's ask is built to that specification: a closed vocabulary of seven hazard families, standardized once, rendered identically across touch, light, and tone, with severity expressed by intensity and marks and never by a different rhythm. Seven learnable families is not proliferation; it is roughly the size of the core traffic-sign vocabulary every driver learns. The dilution risk CTIA correctly identifies attaches to voluntary, inconsistent implementation, in which the same alert feels different on different devices; that is an argument for a standardized mandatory track, not against meaning-bearing signals. And the feasibility of per-event, device-side differentiated behavior is conceded in the same filings that hesitate at requirements: CTIA accepts alert amplification "where a device delivers stored messages via speech when it receives an earthquake alert" as achievable within the proposed timeline (CTIA Comments at 8, and calling the 36-month timeframe for those measures reasonable, *id.* at 9), and ATIS confirms that per-alert tailoring is already contemplated by 3GPP on the network side (ATIS Comments at 5). A device that can be required to speak a stored message on receipt of an earthquake alert can be required to render a stored

vibration pattern on the same trigger; the storage, distribution, and trigger architecture is closely analogous. The natural first pattern is the earthquake cadence itself: the logic of a distinctive signal for a no-notice hazard applies with equal force in every channel a person may be relying on, not only in sound.

The decisive point arrived from the party whose proposal started this branch of the proceeding, and it is affirmative rather than defensive. The United States Geological Survey, the federal agency statutorily mandated to alert for earthquakes and the originator behind ShakeAlert, names as a present limitation of IPAWS, WEA and EAS "the absence of a unique attention signal for EEW to enable user recognition and action WITHOUT READING A TEXT MESSAGE" (USGS Comments at 1, emphasis added), and recommends in terms: "Institute distinct attention signals and device behavior for alerts of different severity." (id. at 6). IDE supports that recommendation by name and asks the Commission to complete it in the one dimension USGS did not need to reach. USGS asks for recognition and action without reading, for a user who cannot look at the screen in the seconds before shaking arrives. A Deaf or DeafBlind user needs recognition and action without hearing, at every hour and for every hazard. These are the same requirement stated from two sides, and a rule that grants one and not the other has decided that the unreachable user worth designing for is the one who cannot look.

USGS also disposes of the "signals alone convey no meaning" concern with deployment rather than argument. It reports that Android Earthquake Alerts, carrying USGS ShakeAlert in Washington, Oregon and California, already operates "a three-level alerting system based on research and focus groups", in which the area closest to the earthquake receives "Take Action" alerts with an urgent attention signal that breaks through do-not-disturb, a larger area receives "Be Ready" with a less urgent attention tone, and a wider area receives "Be Aware" (USGS Comments at 6). Differentiated attention signals conveying graded urgency are therefore not a proposal to be tested against 1960s siren research; they are shipping today to three states, developed with user research, by the alert originator. What is missing is not evidence that the approach works. Nor is it that the differentiation lives only in sound. The documented behavior of the three levels gives "Be Ready" a prominent continuous vibration and a display that wakes to show the message, and "Take Action" a screen driven to full brightness so that the handset itself becomes a light source (USGS staff correspondence with IDE, 17 September 2026, summarizing the documented Android Earthquake Alerts behavior; see the Declaration of Emmanuel Jacq filed with these reply comments). What is missing is that none of this is standardized, that the vibration carries no graded meaning of its own, and that at the highest level the tactile channel is switched off altogether, to keep the motor from disturbing the handset's own sensors. So the recipient who cannot hear the full-volume alarm and is not looking at the screen, asleep or with the phone face down, is unreachable at the one level that matters most. IDE

asks for the same design, rendered in touch and light as deliberately as it is in sound, standardized so it means the same thing on every device, with the sensor question put to the device makers as an engineering problem to solve rather than accepted as a reason to remove the channel.

III. Symbols: the record supports a standardized, expert-recommended set with mandatory device support; testing must include Deaf and DeafBlind users; and a symbol must supplement, never substitute (FCC 26-38 ¶¶ 77-82).

The symbol record splits into a standardization camp and a voluntary camp, and the Commission should notice which camp the implementing industries are in. CTIA, whose members would render the symbols, supports "a standardized set recommended by experts in accessibility and emergency communications" (CTIA Comments at 6). IDE asks the Commission to separate two questions the record keeps merging. Whether every device and system must SUPPORT the standardized set is a capability question, and the answer should be yes, because a symbol that renders on some devices and not others is worse than no symbol at all. CTIA has already accepted the premise that support belongs on the device rather than on the air path, titling its section "CTIA Supports the Use of Pre-Installed Symbols for Alerts" (CTIA Comments at 6). Whether a given alert CARRIES a symbol is a separate, editorial question, and the answer should be that it is the originator's to make. Put that way, NAB's request to "allow, but not require, EAS Participants the option to use symbols based on their medium and resources" (NAB Comments at 22) is largely granted: no Participant is compelled to originate a symbol, and the obligation that remains is to be able to render one when an alerting authority sends it. ATIS asks the Commission to "consult with the appropriate communities about what symbols would be the most understandable and effective to convey messages" (ATIS Comments at 10). Washington EMD supports a symbol requirement with the right condition: "Symbols should supplement, rather than replace, clear text and protective action instructions and should be tested to ensure they are easily understood by the public." (Washington EMD Comments at 3). NYCEM supplies the strongest originator evidence in the record: its Notify NYC graphics "doubled alert comprehension and resulted in a 46% increase in engagement on social media" (NYCEM Comments at 7, para 20).

Against this, NAB would leave the option to each Participant according to its medium and resources (NAB Comments at 22), and NCTA opposes any requirement of standardized symbology, asserting that "EAS server vendors do not offer symbols" (NCTA Comments at 6). The market-status claim is offered without support, and it proves nothing in any case: vendors do not ship capabilities no rule or standard yet defines. The record already contains the implementation path, conceded by a mandate opponent: DIRECTV states that if the Commission

defines "a set of symbols that are similar to a normal character set (like emojis, for example)," EAS equipment providers could develop a software update enabling legacy equipment to pass them through, validated through a national EAS test (DIRECTV Comments at 4). DAS, an EAS equipment vendor, describes the same architecture from the vendor side: preloaded symbol libraries, compact identifiers, "a symbol identifier registry" (DAS Comments at 27), and the correct fallback rule, that a device lacking the library or receiving an unknown identifier "should still present the alert through required text, audio, attention signals, vibration, or other supported mechanisms" (id. at 26). NAB itself concedes that "a software-based model could facilitate all of these functions" (NAB Comments at 4). IDE notes that this registry-plus-preloaded-assets architecture is, component for component, the same architecture IDE's opening comments proposed for the haptic vocabulary: a compact identifier carried with the alert, assets provisioned in advance, rendering local to the device, and a defined fallback that is never silence. A rule that builds the symbol pipeline has already built the cadence pipeline.

Two refinements from the record should be resisted or completed. ATIS proposes "an initial focus on symbols related to protective actions ("take cover") rather than descriptive ("tornado")" (ATIS Comments at 10). Protective action belongs in plain language selected by the originator, exactly because the right action is context-dependent; the symbol's irreplaceable job is hazard identity, the fact that lets a recipient orient in a second. IDE's opening comments ask for both: an action-first plain-language instruction beside a hazard-identity symbol. Collapsing the symbol into a generic action icon would discard the one thing a symbol does best. And NWS calls the NAPSG symbol set "sufficient for NWS needs" (NWS Comments at 2); but sufficiency for the originator is not comprehension for the recipient. As the Accessibility Organizations note from the Commission's own cited research, NAPSG symbology "did not improve understanding of either the event or recommended protective action among Deaf participants who primarily used ASL" (Accessibility Organizations Comments at 4, citing the Further Notice). DAS reads the same study as supporting "further testing, consistent pairing of symbols with text, and repeated public exposure" (DAS Comments at 26), and IDE agrees with that reading while adding the design consequence: if learnability under repeated exposure is the mechanism, the vocabulary should be small and its elements guessable at first exposure, which is exactly what IDE's structured testing with Deaf and DeafBlind participants is being organized to measure, with instruments and results offered to the standards process. DAS's own sentence should become a requirement of any symbol rule: "Testing should include people with disabilities, people with limited English proficiency, Deaf and hard-of-hearing users, older adults, children, and users responding under stressful conditions." (id. at 27). The American Council of the Blind, the American Foundation for the Blind, and Bridge Multimedia ask for the same measure from the blindness side, that symbol design "remain usable for braille, low-vision, DeafBlind, and cognitive-access users rather than treating visual recognition as the only measure of success"

(ACB, AFB, and Bridge Multimedia Comments, Topic 5). A symbol rule tested only for sighted recognition satisfies neither coalition.

One further filing supplies deployed evidence for the validation step, from a nonprofit alerting service rather than an advocacy organization, and IDE supports it by name. Watch Duty, a 501(c)(3) providing real-time wildfire information used by more than thirty million people, urges the Commission to require "that the meaning of a symbol be carried by shape, and where zones or areas are shaded, by pattern, not by color alone", and to "require that any adopted symbol set be validated under color vision deficiency simulation before it is mandated", observing that this "costs nothing at the design stage and cannot be retrofitted cheaply afterward" (Watch Duty Comments at 6-7). It reports doing exactly this in production: its evacuation zones carry a repeating pattern as well as a hue, and remain distinguishable under simulation of common color vision deficiencies and in the conditions where the maps are actually read, "on a phone, outdoors, in smoke, at speed" (id. at 6).

IDE notes that Watch Duty's request and the Accessibility Organizations' request are the same requirement wearing two labels. One asks that the symbol set be validated against color vision deficiency before it is mandated; the other asks that it be tested with Deaf participants whose primary language is ASL, the testing whose absence the Commission's own cited research already exposed. Both are pre-mandate validation, both are cheap before adoption and expensive after, and neither is satisfied by validating for the other population. The Commission should adopt one validation requirement with all of these populations inside it, and should state that a symbol set which has not passed it is not ready to be required. One requirement does not mean one instrument: a colour vision deficiency simulation of a glyph and a discriminability test of a tactile pattern are different measurements, run by different methods, and the rule should require both rather than let either stand in for the other. IDE also adopts Watch Duty's framing that standardized symbology should be understood as an operational necessity and not "solely as an accessibility measure" (id. at 7): its example of a resident who learns Ready, Set, Go in Oregon and evacuates into a California county where green means an order has been lifted is a failure of shared meaning that injures everyone, and a vocabulary fixed for that reason serves Deaf recipients in exactly the same act.

IV. The affirmative all-clear: alert originators supplied the factual predicate, the identifier proposals supply the mechanism, and the fatigue objection has the sign backwards (FCC 26-38 ¶¶ 51-58).

Two of the largest alert originators in this round independently established both halves of IDE's all-clear request. NWS describes the Shrinking Polygon Dilemma: because sending updates re-triggers tones, NWS avoids updating when an alert area shrinks, so "old broadcasts continue over

the entire original boundary until expiration, falsely alerting travelers entering areas where the hazard has already passed" (NWS Comments at 2). NYCEM proposes that a universal message identifier let originators send a follow-up "All Clear" WEA scoped to "only reach phones that received the original WEA", and "advises the Commission to incorporate this capability into the rule being promulgated" (NYCEM Comments at 3, para 9); it reports that of WEAs with 24-hour expirations, "over 42% of these were cancelled early or shortened by the update" (id. at 4, para 12). For day-long alerts, the stated expiry is wrong in more than two cases in five, and whatever actually ended the alert, the recipient is told by silence.

The mechanism the all-clear rides on is already the consensus item of this round. NAB asks that any duplicate-suppression mechanism "clearly distinguish between genuine duplicates and legitimate alert updates, corrections, cancellations, extensions, and other material changes" (NAB Comments at 19). The Accessibility Organizations ask that deduplication "not suppress a material update or cancellation, including an update that contains different or more complete accessible information" (Accessibility Organizations Comments at 10). The American Council of the Blind, the American Foundation for the Blind, and Bridge Multimedia ask for the same thing from the presentation side: accessible presentation should "distinguish an initial alert, an unchanged repeat, a material update, a cancellation, and an expired alert", because a recipient using an accessibility pathway "should not have to infer from repeated presentation whether the emergency itself has changed" (ACB, AFB, and Bridge Multimedia Comments, Topic 3). Sinclair asks that a common event identifier let receivers "associate supplemental maps, video, alternate-language content, updates, and cancellations with the correct underlying EAS or WEA event" (Sinclair Comments at 4). IDE supports each of these by name and asks the Commission to complete the chain with the presentation half: when an issuer-authorized cancellation or all-clear arrives, devices should present it affirmatively and accessibly, in words that say what ended, with a gentle, self-terminating presentation that is never louder than an alert. NCTA's objection that universal identifiers for EAS would be "marginal and not worth the cost" (NCTA Comments at 6) should be weighed against NWS's falsely-alerted travelers and NYCEM's finding that more than 42 percent of day-long alerts were cancelled early or shortened: the benefit is not marginal to a person still sheltering from a danger that ended hours ago.

The record contains two identifiers, and the difference between them is the difference between suppressing a duplicate and presenting a resolution. NYCEM's proposal is a per-MESSAGE identifier, generated centrally by IPAWS so that two systems cannot mint the same value, whose purpose is to let a receiver recognize that it has already presented this exact message (NYCEM Comments at 3, paras 7-9). Sinclair's is an EVENT identifier, stable across an incident, whose purpose is to let a receiver associate later material with the same underlying emergency (Sinclair Comments at 4). Both are needed, and neither substitutes for the other: de-duplication needs the

first, and an all-clear that reaches the people who received the warning needs the second. IDE asks the Commission to require both, and to require that every update, cancellation and all-clear carry an explicit reference to the event identifier of the alert it resolves, so that a receiver never has to infer the relationship from timing or from text. The presentation rules should then distinguish three endings that today are collapsed into one silence. An expiration means the stated duration ran out and says nothing about the hazard. A cancellation means the original alert should not have been relied on, whether it was issued in error or superseded. An all-clear means the hazard has ended and the protective action may stop. Only the third is a message a person sheltering is waiting for, and only the third should be presented affirmatively. Conflating them is not a labelling problem: a device that presents an expiration as an all-clear tells a person it is safe to come out on the strength of a clock.

ATIS warns that "frequent notifications containing little new actionable information may contribute to alert fatigue and reduce public responsiveness to future alerts" (ATIS Comments at 4-5). IDE agrees with the premise and rejects the application: an all-clear is the highest-information update an alerting system can send. It ends protective action; it is the difference between sheltering and living. And it is self-limiting by design: in IDE's opening proposal the release presentation is gentle, presented at most a few times, never escalating, and self-terminating, the behavioral opposite of an alarm. A message class engineered never to insist cannot drive fatigue. What drives fatigue is its absence: alerts that go silent without resolution teach recipients that the system does not tell them when it matters less, so they stop trusting it when it matters more.

Two state filings complete the delivery picture. Michigan's emergency management division proposes measuring geotargeting against "delivery to 100% of opted-in devices inside the target area" (Michigan MSP Comments, unpaginated); IDE supports that standard, measured where it can honestly be measured, at capable devices in the target area. Perception cannot be metered without knowing things about a recipient that no alerting system should hold, and IDE does not ask the Commission to try. The accessible half belongs in conformance rather than in the delivery count: require that a device rendering an alert render it in a form perceivable without sight and without hearing, test that requirement against the populations it exists for, and report on the capability. A system that measures only how many handsets received the bits will report full success in a population none of whom perceived the warning. Ohio EMA suggests letting users attenuate alert tones at certain hours to "keep people from turning the alerts off completely" (Ohio EMA Comments, unpaginated); IDE supports the retention goal with one condition: any attenuation feature must preserve a persistent non-audible channel, because for a user who never heard the tone, silencing without a tactile or visual substitute converts a quiet hour into a silent failure.

V. Text-to-speech and audio enhancements should be adopted together with their non-auditory equals, and flash features need the safety limits the reviewed comments do not supply (FCC 26-38 ¶¶ 83-86).

IDE supports the Attorneys General's request for built-in, opt-in text-to-speech, and supports the parity precedent they cite: the Commission already requires that on-screen television emergency crawls be "accompanied by secondary audio narration that will be accessible to viewers who are blind or low vision" (AG Comments at 9). That precedent runs in both directions. It stands for the principle that emergency information presented in one modality must be carried in a second, mandated modality for those who cannot perceive the first. Extending it to WEA through text-to-speech completes the picture for blind and low-vision users; the same principle requires the mirror extension, an equivalent tactile and visual channel, for Deaf and DeafBlind users, exactly as the Accessibility Organizations request (Accessibility Organizations Comments at 2, 7). A blindness coalition states the same principle from the other direction: "We share with our colleagues representing Deaf and hard-of-hearing communities the concern that an auditory enhancement cannot be the sole pathway for recognizing and acting on an earthquake alert." (ACB, AFB, and Bridge Multimedia Comments, Topic 6). The AGs' letter proposes a substantial auditory build-out and no non-auditory equivalent; the Commission should adopt the build-out and its mirror in the same order, so that the gap the Further Notice inherited is not rebuilt one modality wider.

The same coalition supplies the deadline against which all of this should be measured, and the reason it cannot be met by a subscription. The Attorneys General "eagerly await implementation of the FCC regulations that require wireless providers participating in WEA to support template-based multilingual alerts in the 13 most commonly spoken languages in the United States, as well as English and American Sign Language (ASL) by June 12, 2028" (AG Comments at 3). Nineteen States, the District of Columbia and the City of New York stand behind that sentence, and the Accessibility Organizations ask the Commission to "continue developing a practical pathway for ASL emergency information," adding the premise IDE shares: ASL "is a complete and distinct language with its own grammar and syntax; it is not English communicated through signs" (Accessibility Organizations Comments at 5). The AGs then report the finding that makes June 2028 urgent rather than comfortable. Where ASL and multilingual alerting exist today they are opt-in, and "the numbers of subscribers in ASL and in languages other than English is understood to be far lower relative to their representation in these communities," because people do not know the services exist at all (AG Comments at 7 and n.15). An accessibility feature that must be discovered and requested in advance is not reaching the population it was built for. The Commission has already decided part of this, and decided it the other way. Its 2023 rule requires WEA-capable mobile devices to support templates in American Sign Language, and the Bureau

has set the compliance deadline at June 12, 2028 (DA 25-1078). That rule also decided how ASL reaches a user: it requires providers to give subscribers the ability to opt in, and lets the user's voluntary selection trigger the download of ASL templates to the device. The evidence just quoted was not before the Commission when it made that choice. This Further Notice asks a version of the same question in a different place, whether text-to-speech for earthquake alerts should reach users by default or only on affirmative opt-in. IDE's answer there is by default, for the same reason. IDE does not ask the Commission to decide the ASL enrollment question in this proceeding, where it has not been noticed and where no party has had the chance to address it. IDE asks the Commission to address equivalent default access for ASL in a further notice or implementation proceeding, and to open it on a schedule that can still change what ships in June 2028 rather than arriving after the templates are built. IDE filed a written ex parte presentation in these dockets on September 14, 2026 (ECFS confirmation 20260914861111177) asking the Commission to place concurrent ASL, signed by a Certified Deaf Interpreter, on the same schedule as the multilingual templates, together with an all-clear template, the deferred template candidates, and a revisit date for fillable ASL; concurrent ASL is additional to the 2023 template requirement rather than part of it, and IDE renews those requests here.

Cal OES states the implementation rule that makes any of this real: multilingual text-to-speech needs "vendor-neutral standards and a shared pronunciation lexicon for place and street names; without them the same alert will be read aloud differently, and sometimes unintelligibly, across devices" (Cal OES Comments at 3), and device rendering behavior should be "specified in the rule rather than left to individual device implementations" (*id.* at 3-4). The identical logic governs the tactile channel: without a standardized haptic mapping, the same alert will buzz differently across devices, and a learned vocabulary collapses at exactly the moment it is needed. A state emergency management agency has already placed rule-specified rendering floors in this record; IDE asks that the haptic mapping be one of them.

On flash features, the record promotes and does not protect. The AGs encourage consumer education about the smartphone feature that "can flash a light—either the camera LED, or the screen, or both—on the device" on receipt of a WEA, calling it "especially useful to deaf, DeafBlind, or Hard of Hearing persons as an attention-grabbing tool" (AG Comments at 7, 7-8); NYCEM asks the Commission to require an opt-in cadenced screen flash (NYCEM Comments at 10, para 25). IDE supports both requests by name, and supplies the guardrail neither filing mentions, offered as support rather than rebuttal: none of the attachment-bearing comments IDE reviewed, including the two that promote flash features, addresses photosensitivity. Flash presentations must be bounded, evaluated separately for each light source, and always accompanied by a steady, non-modulating light path and a non-visual path available without requiring any person to disclose a photosensitive condition. IDE's draft patterns stay within the

three-flashes-per-second bound of WCAG 2.3.1, and IDE offers that bound as a floor rather than as a finished safety standard: it was written for web content, and a camera LED at arm's length in a dark room is a different exposure that a rule mandating the feature should evaluate on its own terms. The safety review costs a sentence in the rule now; a seizure triggered by an emergency alert would cost the feature, and some of the program's trust, later.

VI. Message authentication should be adopted, and the rule should distinguish a forged alert from an unavailable trust path (FCC 26-38 ¶ 41).

IDE supports requiring a valid digital signature on CAP alerts, without a carve-out. The record supports it too, and divides only on what happens when verification does not succeed. NCTA agrees the requirement "would help protect the alerting system from false alerts" and opposes any legacy equivalent (NCTA Comments, Message Authentication). NYCEM supports it without qualification and asks that FEMA publish a vendor list, that the transition be generous, and that live testing follow it (NYCEM Comments at 2, paras 3-5). NWS states that it cannot digitally sign its EAS messages via NOAA Weather Radio at this time and would like to work toward that "in the next few years" (NWS Comments at 1, Section 4a). The AWARN Alliance asks the Commission to close the same gap from the broadcast side, urging that for CAP-based EAS "the Commission should require EAS Participants to process only messages carrying a valid digital signature" (AWARN Comments at 2). Cal OES states the condition, and no comment IDE reviewed answers it: "Certificate expiration is an availability risk as well as security control. Any authentication requirement should be paired with a defined failure mode, so that an expired certificate cannot silently prevent a life-safety alert from reaching the public." (Cal OES Comments at 3, Part II.B.)

The Further Notice asks exactly the right question and leaves it open. It records that today "EAS Participants are only required to reject EAS messages that include an invalid digital signature" and that "[o]ur rules still allow EAS Participants to transmit EAS messages with no digital signature at all," and it proposes to close that gap (91 Fed. Reg. 48320, 48321). It then asks whether the Commission "should take any steps to mitigate risks, including the possibility of key management and authentication failures" (id. at 48322), and asks whether "there have been any notable cases in which valid alerts have been erroneously delayed or rejected" (id. at 48321). IDE has one, and it is set out below. Its lesson is that the answer turns on a distinction the proposed rule does not yet draw.

"Verification failed" is not one event. It is at least five, with different causes and different correct responses: a message carrying no signature at all; a signature that does not verify over the message, because the digest does not match the canonicalized bytes or the signature value is wrong; a signature that verifies against a certificate that has expired; a signature that verifies

against a current certificate whose revocation status the receiver cannot check because the revocation service is unreachable; and a signature that verifies against a current and entirely valid certificate that the receiver cannot chain to a trusted root, because the receiver does not hold an intermediate certificate in the issuing path. The first two are evidence about the message. The last three are facts about the receiver and about the certificate distribution around it, and they say nothing whatever about whether the alert is genuine. A rule that answers all five with the single word "reject" converts an ordinary outage in certificate distribution into the suppression of real warnings, at scale, and does it without anyone being told.

IDE offers the notable case the Commission asks for, and it is the fifth kind. IDE consumes the public IPAWS feed as a redistributor and verifies the XML digital signature on every alert it ingests, pinning the issuing chain rather than trusting a general certificate store. From August 20 to September 13, 2026, IDE's pinned set was incomplete: it held one of the two IdenTrust intermediates under which FEMA issues IPAWS device certificates. Over those twenty-five days, twenty-six genuine alerts from twelve alerting authorities, eleven of them county or parish emergency management agencies, among them Garfield County, Colorado; Butler County, Ohio; Tensas Parish, Louisiana; Stanly County, North Carolina; and Trinity County, California, failed to chain. Every signature was cryptographically sound and every certificate was a valid, unexpired FEMA device certificate. The entire defect was one missing intermediate at the receiving end. IDE confirmed the cause from the certificate itself, and then in writing: on September 14, 2026 the IPAWS Customer Support Branch Chief, Office of National Continuity Programs, stated that IPAWS is "currently running a mix of CA-1 and CA-2 certs all of which should track back to Federal Root certificates," and that the certificate behind one affected alert "was generated in March 2024 and will remain in use and valid through March 2027." (See the Declaration of Emmanuel Jacq filed with these reply comments.) Two concurrently valid issuing intermediates are the steady state, not a migration tail, and a receiver that knows about only one of them will reject genuine alerts for as long as that remains true.

The twenty-six alerts are set out below, as IDE's own ingest recorded them. The date is the day the rejection was first recorded, and the alerting authority is the CAP sender rendered in plain form. Three further facts are identical in every one of the twenty-six rows and are therefore stated once here rather than repeated twenty-six times: the recorded verdict was leaf-not-issued-by-pinned-intermediate, the reason code IDE's verifier wrote at the time; the issuing intermediate was IGC Device CA 1, read directly from the certificate of the Butler County, Ohio alert with identifier 17891796250003921651010 and established for the remaining alerts by the correction itself; and the result after correction was, in every case, verified. Once IGC Device CA 1 was added to the pinned set on September 13, 2026, every one of these alerts verified, and no alert has failed to chain since.

Date	Alerting authority	CAP identifier
2026-08-20	Calaveras County, California OES	2696966194594306
2026-08-20	Garfield County, Colorado	2693770738937928
2026-08-20	Garfield County, Colorado	2693770738939427
2026-08-22	Lee County, Alabama EMA	17874398570001397447190
2026-08-23	Lee County, Alabama EMA	17874569790003892271010
2026-08-28	ASHERGROUP	ASHERGROUP-1757024-post-1787954354
2026-08-29	Trinity County, California OES	17880479310001397667130
2026-08-30	Trinity County, California OES	17880534890003900391010
2026-08-30	Trinity County, California OES	17881282230001397587267
2026-08-30	Kern County, California OES	2709129542130994
2026-08-31	Kern County, California OES	2709060822645213
2026-09-02	ASHERGROUP	ASHERGROUP-1758923-post-1788381014
2026-09-06	ASHERGROUP	ASHERGROUP-1760806-post-1788720135
2026-09-06	ASHERGROUP	ASHERGROUP-1760806-cancel-1788721099
2026-09-06	Orange County, Virginia	17887386810001397812120
2026-09-08	Columbiana County, Ohio	17888793020001397842098
2026-09-08	Tensas Parish, Louisiana	17888877530001397812199
2026-09-09	Spartanburg County, South Carolina	2718509750555527
2026-09-09	Tensas Parish, Louisiana	17889227100003916391010
2026-09-09	Stanly County, North Carolina	17889563770001397832135
2026-09-09	Stanly County, North Carolina	17889831550001397812223
2026-09-12	Butler County, Ohio EMA	17891711660001397942064
2026-09-12	Butler County, Ohio EMA	17891796250003921651010
2026-09-12	Butler County, Ohio EMA	17891799690001397942066
2026-09-13	Garfield County, Colorado	2730020262978886
2026-09-13	Garfield County, Colorado	2729711025337192

That is Cal OES's condition, measured. It is also the answer to the Commission's question about risk: the risk that materialized was not a forged alert getting through. It was twenty-six real emergency alerts, from twelve alerting authorities, that a conforming receiver had every reason to treat as unauthenticated for twenty-five days, with nothing wrong with any of them.

IDE's implementation splits that outcome by reason rather than treating every failed verification alike. Where the signature verified over the alert's own bytes and the failure is in IDE's own trust material rather than in the message, an expired signing certificate or a path IDE cannot build from that certificate to a trusted root, the alert is delivered exactly as a verified alert is, and is

recorded as unauthenticated together with the reason. Where the signature is absent or cryptographically invalid, the alert is held: stored and audited so that a record of it exists, raised at once to IDE's operators with the reason and the sender, and kept out of the push channel that reaches a device unprompted. IDE states plainly what is not yet true of that, rather than leaving it to be found, because the record should not carry a stronger claim than the mechanism supports. IDE runs no revocation check at all, so the second of companion (a)'s three conditions does not arise in IDE's own system, and IDE supports a rule for it from the record rather than from its own practice. The hold is applied at the push channel first and is being extended to IDE's other read paths. The recipient-facing not-authenticated marker is drawn from the recorded verdict and is being built. And a certificate IDE cannot chain includes one issued under an authority IDE has never heard of, which is why companion (c) below asks FEMA to publish the issuing set rather than leaving each receiver to learn it by correspondence.

The cost of getting this wrong is not distributed evenly, which is why IDE raises it rather than leaving it to the parties whose expertise is the certificate chain. A hearing recipient whose alert is withheld may still learn of the hazard another way: an outdoor siren, a neighbor, a television already on in the room. A recipient who is deaf or hard of hearing, for whom the device is the entire warning, learns nothing at all, and does not know there was anything to learn. Silent non-delivery is the one failure mode that converts a redundant warning system into a single point of failure, and it does so only for the population whose access this proceeding exists to secure. A rule that leaves the failure mode unstated does not leave it undecided. It decides it, by default, against the recipients least able to absorb it.

IDE therefore asks the Commission to adopt the authentication requirement with five companions, none of which weakens it:

(a) The rule names which of the five conditions require rejection, rather than leaving each implementer to decide on its own whether a life-safety alert from a county emergency manager is an attack. A missing signature and a cryptographically invalid signature are grounds for rejection, and IDE does not ask the Commission to soften that. The other three are not evidence of forgery and should not be answered as though they were. An expired certificate on a signature that is otherwise sound, which is Cal OES's case, an unreachable revocation service, and a trust path the receiver cannot build are all failures of the receiver or of the certificate infrastructure around it. Each of the three has a correct response that is neither rejection nor silence: fall back to the last known good trust state, present the alert, mark it, and raise it to the operator at once. The Commission need not choose IDE's handling of them, but it should choose one, in the rule, because the alternative is that every implementer chooses differently and the public finds out which way during an emergency.

(b) Verification outcomes are logged and reportable, so that a systemic change in the issuing chain surfaces as data rather than as an unexplained fall in alert volume that no one is positioned to notice. IDE's own incident was visible only because IDE instruments it.

(c) FEMA publishes a versioned trust bundle: the complete current set of issuing certificate authorities for IPAWS device certificates, with a version and an effective date, published before a change takes effect rather than after. IDE learned that two intermediates are in use by asking FEMA directly. A rule that makes chain validation load-bearing for life-safety alerts should not leave every receiver to discover the trust anchors by correspondence, and the accessibility layer, which is disproportionately made of small nonprofit and independent implementers, is where that cost lands hardest.

(d) EAS equipment caches the current and the successor chain with an overlap period, validates locally against what it holds, and alerts its operator the moment a validation begins failing for a reason that is not the message.

(e) Where a participant must reject, the rejection is not silent to the people in the alert area. This is the companion that answers the harm described above, and IDE asks for it in the narrow form that cannot be turned into an attack. IDE does not ask that the content of an unauthenticated message be presented: an attacker who can flood a station with forged alerts must not thereby be able to put text on the public's screens. IDE asks for the fact and not the content, rate limited, and only where the same authority's alerts have been arriving normally: that the system is rejecting messages it cannot authenticate, that the public should seek information by other means, and that the operator and the Commission are already on notice. Nothing, for a person whose only warning channel is the device, is indistinguishable from no emergency. The rule should not leave that as the default answer.

The United States Geological Survey supports the security objective but warns that authentication is a latency cost on the alerts least able to absorb one, citing an example of an estimated 8.6-second delay when a digital signature is added, and recommending that any new authentication rules keep a fast path for earthquake early warning, so that the most time-critical class of alert is not held behind the check (USGS Comments at 5). IDE supports the fast path and asks the Commission to grant it, with one correction that makes it cheaper than USGS feared. The 8.6-second estimate is the Commission's own, and it is about something else: the Further Notice attributes it to CSRIC VI's finding that "adding a digital signature with a key length of 2048 bits would add 8.6 seconds, if sent twice with the header code strings, to the time required to validate and process the alert's header code strings," in the discussion of whether LEGACY EAS alerts should be signed, expressly because, "[u]nlike CAP alerts, legacy EAS is severely limited in how much data it can convey because the data that comprises the alert is converted

into audio for transmission over broadcast" (91 Fed. Reg. 48320, 48322). That cost is the cost of carrying signature data through an audio channel at every hop of the daisy chain. It is not the cost of verifying a signature already present in a CAP XML document, which is a local computation over bytes the receiver already has. Signature and chain validation against a pre-provisioned trust bundle is measured in milliseconds and needs no network at all, which is what companion (d) buys. One part of verification can reach the network, and the record already identifies it: NYCEM observes that the proposal "would affirm reliance on the internet for checking encryption key certificates related to digital signatures" (NYCEM Comments at 2, para 4). That is the revocation check, and it is exactly the part a rule should not put in front of an earthquake alert. IDE asks the Commission to say that revocation status is consulted from cached or stapled material, that an unreachable revocation service is handled under companion (a) rather than by blocking, and that no implementation may make the public's first sight of a warning wait on a call to a third-party responder. The fast path USGS asks for therefore does not need an exemption from the signature rule. It needs the trust material to be present before the earthquake rather than fetched during it.

IDE notes its interest and its limits: IDE holds Collaborative Operating Group 120193 in the IPAWS test environment under its Memorandum of Agreement with the IPAWS program. The verification described above is of the public production feed, which IDE consumes and redistributes; IDE originates no public alert.

VII. The 48-month requests are not matched by any standards work the requesting filings name, and 36 months is consistent with the industry's own concessions (FCC 26-38 ¶ 140); the 90-character transition should be data-triggered (¶¶ 118-20).

CTIA asks for "up to 48 months for testing, implementation, and rollout of symbols" (CTIA Comments at 8); ATIS asks for "a minimum implementation period of 48 months, measured from publication of the final rules" (ATIS Comments at 12). The same filings concede what 36 months can hold. CTIA "supports the proposed effective date of 36 months after Federal Register publication" (CTIA Comments at 4) and calls the proposed 36-month timeframe for earthquake amplification measures, including stored per-event device speech, reasonable (id. at 8-9). ATIS confirms that alert-specific behavior is already contemplated by 3GPP, at least on the network side: "Consistent with 3GPP specifications, CMSPs should be able to tailor rebroadcast intervals to specific alerts as appropriate." (ATIS Comments at 5). And the only standards documents ATIS's filing names, ATIS-0700037 and ATIS-0700049, concern geotargeting; the filing identifies no existing or in-progress standards work for symbols, speech, or any accessibility feature for which it seeks the additional year. A fourth year justified by standards work that neither filing names as existing or in progress is not a schedule; it is a deferral with a number on

it. The Accessibility Organizations state the governing rule: "Technical and logistical challenges should inform implementation, but they should not become a basis for indefinitely postponing accessible alerts." (Accessibility Organizations Comments at 6). The price of the additional year is in the record too: the Attorneys General place before the Commission the National Council on Disability's finding that people with disabilities are "2 to 4 times more likely" to be injured or killed in a natural disaster than people who are not disabled (AG Comments at 4). There is a way to make 36 months work without pretending it is free: sequence the obligations so that carrier, vendor, and platform capabilities land before the originator obligations that depend on them. Phase within the window; do not lengthen it.

On the 90-character requirement, the round divides: the Accessibility Organizations would retire it (Accessibility Organizations Comments at 2); NWS would retire it with a two-year lead (NWS Comments at 3); the AGs would retain it "for at least three additional years" for the sake of residents with legacy devices (AG Comments at 12); Cal OES would defer retirement until measured legacy-device dependence falls below a Commission-set threshold (Cal OES Comments at 3). IDE declines to spend this reply on the calendar and supports the Cal OES approach, a data-triggered retirement, with one requirement elevated whatever the date: when the short version retires, a device that cannot render 360 characters should receive "a defined graceful truncation preserving source, hazard, location, and protective action, specified in the rule rather than left to individual device implementations" (Cal OES Comments at 3-4). The truncation rule is an accessibility rule: the hazard and the action are the two facts no recipient can safely lose, on any device, in any language.

Cal OES also identifies the population that sits underneath this entire proceeding and that nobody has counted. WEA reaches WEA-capable devices only; "older models, low-end handsets, and basic feature phones are not capable, and no mechanism reaches them," and "neither FEMA, the Commission, nor the State publishes an official count of those devices, and that absence is itself a finding the Commission should address" (Cal OES Comments at 1). Their order-of-magnitude estimate is one and a half to two million people in California alone, which is why Cal OES treats EAS as the reach mechanism of last resort for that population and warns that proposals raising the cost of EAS participation reduce coverage for precisely the residents WEA does not reach. IDE supports that finding by name, for a reason that runs parallel to its own: a population no one counts is a population no completeness standard can measure, and the Commission cannot know whether a modernization has closed a gap or widened it while the denominator is unpublished. The same objection applies to accessibility, where the number of people who receive an alert they cannot perceive is likewise unmeasured; IDE asks that alongside any delivery metric the Commission adopts, it require and report accessible-presentation conformance, so that a

modernization cannot be scored a success on a count of handsets while the recipients this proceeding exists for perceive nothing.

VIII. Software-based EAS should be authorized with a capability-based boundary, so the definition regulates the air chain and not the accessibility tools that read the same public data (FCC 26-38 ¶¶ 88-96; proposed § 11.2(e)).

IDE supports authorizing software-based EAS. The accessibility case for it is in NAB's own words: asked whether a software-based model would allow Participants to better process and present alert content, including text-to-speech and other alerting functions, NAB answers that "a software-based model could facilitate all of these functions" (NAB Comments at 4). Sinclair states the condition that should govern the transition: "Advanced capabilities should expand accessibility rather than serve as a basis for weakening the current baseline." (Sinclair Comments at 6). IDE agrees on both counts, and notes that Sinclair's ATSC 3.0 roadmap already names "American Sign Language resources" among the capabilities the modernized architecture should carry (id. at 5).

The definition's boundary matters to accessibility as much as its adoption. Charles Helstein, filing with the stations KAZM, Zero Trust Radio, and Mellow Mountain Radio, asks the Commission to confirm that software does not become EAS Software "merely because it lawfully retrieves, parses, explains, maps, archives, or compares EAS-related data, so long as it neither performs nor manages the operational requirements of §§ 11.32, 11.33, or 11.56 and cannot affect an EAS Participant's signal-processing or alert-forwarding path" (Helstein Comments at 1), because "CAP is a public, general-purpose data format" (id. at 2), and expressly names "accessibility services" among the categories that boundary protects (id. at 3). DAS, the incumbent EAS equipment vendor, draws the same line from the other side of the market: the proposed definition is "too broad and could unintentionally encompass monitoring, reporting, maintenance, licensing, or downstream signal-chain applications that do not themselves perform regulated EAS functions" (DAS EAS Software Comments at 7), and "software that merely monitors, reports on, administers, or exchanges information with a certified EAS system should not itself become regulated EAS software unless it performs or directly controls a required Part 11 function" (id. at 9). Sage names the actual mischief a definition should catch: "Audio must not be sent to an offsite third-party EAS aggregation site, where alerts are inserted and shipped back for broadcast." (Sage Comments at 9).

IDE discloses its interest and supports these commenters by name. Deaflare receives public IPAWS CAP alerts and presents them to its own users in accessible form; it performs no § 11.32, § 11.33, or § 11.56 function, has no path into any EAS Participant's signal processing or air chain, and nothing it does displaces the certified decoder as the authoritative broadcast element.

The correct test is the one Helstein and DAS converge on: capability, not label. Software belongs inside Part 11 when it performs or directly controls a required Part 11 function or can affect a Participant's signal path, and outside it when it reads, explains, or redistributes public alert data to the public. A boundary keyed to labels like "cloud" or "third party" rather than to capability would chill exactly the accessibility layer, from screen-reader-friendly alert viewers to sign-language alert delivery, that this Further Notice's accessibility sections are trying to grow. IDE asks the Commission to state the boundary in the rule, in a sentence it can apply without a case-by-case inquiry: software does not perform or manage the requirements specified in Sections 11.32, 11.33, or 11.56 merely because it retrieves, parses, explains, maps, archives, or redistributes public CAP data to the public, where it cannot affect an EAS Participant's signal processing or alert forwarding path. IDE notes that the proposed definition as published already draws a line by label rather than by capability, excluding "EAS functions and alerts produced within cloud-based systems, and cloud-based third-party EAS services" (proposed 47 CFR 11.2(e)). Sage identifies the conduct that exclusion is reaching for, which is audio leaving the facility and coming back for broadcast (Sage Comments at 9). A capability test catches that conduct wherever it runs, and a label test both misses it when it runs on premises and catches accessibility software that never touches the air chain.

The Commission should adopt the requested clarification.

IX. Conclusion: the actions IDE requests.

IDE respectfully requests that the Commission:

1. Adopt a standardized, expert-recommended symbol set with mandatory device and system support and originator discretion over per-alert use, with pre-provisioned assets, a symbol identifier registry, and a never-silent fallback.
2. Require one pre-mandate validation of that set covering Deaf, DeafBlind, low-vision and colour-vision-deficient users, run with the instruments each presentation mode needs, and state that a set which has not passed it is not ready to be required.
3. Adopt the USGS recommendation to institute distinct attention signals and device behavior for alerts of different severity, and complete it by requiring that the differentiation exist in touch and light and not only in sound.
4. State that meaning-bearing tactile, visual and auditory attention signals are a goal of WEA modernization, and open a consensus standards path for a small hazard-family vocabulary, beginning with the earthquake cadence.

5. Require that WEA delivery reach DeafBlind recipients through touch, including a specified tactile presentation path and interoperability with refreshable braille displays and connected accessible wearables, so that an alert is perceivable without sight and without hearing.
6. Adopt text-to-speech together with its equivalent non-auditory features in the same order, with rendering floors, including the haptic mapping, specified in the rule.
7. Adopt both identifiers: a per-message identifier for de-duplication and a stable event identifier for the incident, and require every update, cancellation and all-clear to reference the event it resolves.
8. Require an affirmative, accessibly presented all-clear, distinguished in presentation from an expiration and from a cancellation, and require that deduplication never suppress a material update or cancellation.
9. Bound every flash feature within photosensitivity safety limits, with a steady-light path and a non-visual path, and treat WCAG 2.3.1 as a floor rather than as the finished standard for device light sources.
10. Adopt the CAP digital-signature requirement, and state in the rule which conditions require rejection, distinguishing a missing or cryptographically invalid signature, which are grounds for rejection, from an expired certificate, an unreachable revocation service, and a trust-path failure at the receiver, which are availability events; and require that where a Participant must reject, the fact of the rejection reach the alert area in rate-limited form, never the unauthenticated content.
11. Require that verification outcomes be logged and reportable; direct that FEMA publish a versioned trust bundle of the issuing certificate authorities for IPAWS device certificates before any change takes effect; and require equipment to cache the current and successor chains with an overlap period and validate locally, which is also what gives earthquake early warning the fast path USGS asks for.
12. Hold the 36-month implementation framework against the unsupported requests for a fourth year, and phase obligations within that window rather than lengthening it.
13. Condition the 90-character transition on measured device data, with a rule-specified graceful truncation preserving source, hazard, location and protective action.
14. Address equivalent default access for American Sign Language in a further notice or implementation proceeding, on a schedule that can still affect what ships on the June 12, 2028 template deadline, and place concurrent ASL signed by a Certified Deaf Interpreter on that agenda.

15. Publish a count of the devices that cannot receive a WEA at all, and require accessible-presentation conformance testing and reporting alongside any delivery metric.
16. Authorize software-based EAS with a capability-based boundary that protects accessibility tools outside the air chain.

IDE renews the offer in its opening comments: its draft Three Senses Alerting Standard, its reference implementation, its conformance suite, and its testing instruments are available royalty-free to the Commission, to FEMA, and to recognized standards development organizations, on the terms stated there; the structured testing with Deaf and DeafBlind participants described there is being organized, and IDE will submit completed, quality-reviewed results through a permissible filing.

Respectfully submitted,

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28 September 2026

Appendix: the forty-three attachment-bearing filings IDE reviewed. The date is the date IDE retrieved and read the filing, which is what scopes the record claims in Section I; ECFS carries each filing's own receipt date. The set is not represented as every comment filed in the round, and express comments filed without an attachment are outside it.

ECFS number	Filer	Retrieved
26110074018	Accessibility Organizations	September 3, 2026
26110074094	Attorneys General and the City of New York	September 3, 2026
26110074048	National Weather Service	September 3, 2026
26110074042	CTIA	September 3, 2026
26110074033	ATIS	September 3, 2026
26110073927	NAB	September 3, 2026
26110074068	NCTA	September 3, 2026
26110074051	NYCEM	September 3, 2026
26110073972	Cal OES	September 3, 2026
26110073936	Washington EMD	September 3, 2026
26110073994	Ohio EMA	September 3, 2026
26110073987	Michigan MSP	September 3, 2026
26110074056	Digital Alert Systems	September 3, 2026
26110074061	Digital Alert Systems, EAS software	September 3, 2026
26110074006	Sage Alerting Systems	September 3, 2026
26110074135	APTS	September 3, 2026
26110074067	NPR	September 3, 2026
26110074029	New York Public Radio	September 3, 2026
26110074015	Sinclair	September 3, 2026
26110074022	iHeartMedia	September 3, 2026
26110074010	ACA Connects	September 3, 2026
26110074049	SiriusXM	September 3, 2026

ECFS number	Filer	Retrieved
26110074072	Helstein and OpenEAS	September 3, 2026
26110073977	DIRECTV	September 3, 2026
26110073512	ACB, AFB and Bridge Multimedia	September 11, 2026
26110073431	USGS	September 14, 2026
26110073609	Watch Duty	September 14, 2026
26110073608	AWARN Alliance	September 14, 2026
26110073572	Foundation for American Innovation	September 14, 2026
26110073681	Seth Morrow	September 14, 2026
26110073755	Intercollegiate Broadcasting System	September 14, 2026
26110073783	Richard A. Rudman	September 14, 2026
26110072917	San Mateo County DEM	September 14, 2026
26110072869	City of Austin	September 14, 2026
26110072735	Gatewell Group	September 14, 2026
26110072098	Gary Saber	September 14, 2026
26110072311	Nwosu Odinma Fortune	September 14, 2026
26110072417	Franklin W Bell	September 14, 2026
26110073069	LPTV Broadcasters Association	September 14, 2026
26110076069	Abigail Post	September 14, 2026
26110075520	NYCEM letter to AT&T	September 14, 2026
26110075521	NYCEM letter to T-Mobile	September 14, 2026
26110075522	NYCEM letter to Verizon	September 14, 2026