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November 8, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Review of the Emergency Alert System; Independent Spanish Broadcasters, The Office of Communication of The United Church Of Christ, Inc., and The Minority Media and Telecommunications Council, Petition for Immediate Relief; EB Docket No. 04-296

Dear Ms. Dortch:

On November 7, 2007, Andy Scott, Vice President of Engineering, National Cable & Telecommunications Association (“NCTA”), Steve Johnson, Senior Director, Engineering Standards, Time Warner Cable and Chairman of the Society of Cable & Telecommunications Engineers (“SCTE”) EAS Subcommittee and Loretta Polk, Vice President & Associate General Counsel, NCTA attended a meeting hosted by Tom Beers, Deputy Chief, Policy Division, FCC Public Safety and Homeland Security Bureau (PSHSB) concerning the state of multilingual delivery of emergency information under the Emergency Alert System (EAS). The participants included representatives from the cable, direct broadcast satellite, satellite radio, wireline and wireless industries. Claudia Fox, Associate Chief, Public Communications Outreach and Operations Division, PSHSB, Bonnie Gay and other Bureau staff also attended the meeting.

As discussed in our comments in this proceeding, we explained that the best means to provide EAS messages in a second language to cable customers is for the originator of the audio message to issue it in both languages, such as English and Spanish. The cable system would pass-through the bi-lingual audio message within the two-minute EAS window. Cable systems have no capability, however, to reformat or translate the messages. We also explained that if separate audio messages at two minutes each per language were issued, the EAS equipment would likely disregard the second message because it will interpret it as duplicative.

With regard to text messages, Mr. Johnson described a Time Warner system serving Austin and Waco, Texas which has installed EAS equipment that is capable of supporting English and/or Spanish.

Ms. Marlene H. Dortch

November 8, 2007

Page 2

Finally, with respect to the affect of “next generation” EAS and the Common Alert Protocol (CAP) on the delivery of emergency messages to non-English speakers, we noted that this can not be determined until there is more information on the standard being developed by FEMA.

Sincerely,

/s/ Loretta P. Polk

Loretta P. Polk

Vice President & Associate General Counsel

cc: Tom Beers
Claudia Fox
Bonnie Gay