| WA-PAWS – Tab D1 | **LECC Guidelines** | 09.14.21 |
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**Table of Contents**

## LECCs: BACKGROUND, THEIR PARTNERS AND WHAT THEY DO

LECCs are Local Emergency Communications Committees. The term LECC originated in the mid-1990's to help provide structure for what was then the new Emergency Alert System or EAS. The EAS is governed by the FCC; the Federal Communications Commission and Part 11 of its Rules and Regulations. As part of the previously noted structure building, Washington state and portions of Idaho, Montana and Oregon were divided into several subdivisions containing one or more counties. These subdivisions are known by various names, including Local EAS Areas, EAS Operational Areas and Operational Areas. Operational Areas will be used in this document. The Washington State EAS Plan calls for an LECC in each of the Operational Areas and Tab 3 of the state plan is a map of the various areas. (A link to the entire Washington State EAS Plan can be found on page 6 of this document).

LECCs work with and are partners of the State Emergency Communications Committee (SECC). Another very important partner of LECCs is the Washington State Emergency Management Division (WEMD).

LECCs oversee the EAS in their respective Operational Areas. As part of that oversight, LECCs recommend best practices for determining when and how to originate and disseminate local public alert and warning messaging utilizing EAS, Wireless Emergency Alerts (WEAs) and other related warning systems. It is important for LECCs to remember that these warning systems are the tools whose purposes are (1) to ensure public safety and (2) preserve life and property when an emergency occurs.

An important duty of LECCs is to create, maintain and periodically update the Operational Area's Local Alert and Warning Plan, or simply Local Area Plan, and to routinely discuss policies and procedures that govern its use along with the warning systems that are described within the plan. For more information, see **'LECCs and Local Area Plans'** on page 6 of this document.

## TAB 24: PURPOSE AND WHAT'S NEW WITH THIS VERSION

Tab 24 was created to help LECCs understand their role in EAS and related public warning systems. Over time, portions of it were periodically modified; this version is essentially a re-write of earlier ones. It's tailored not just for LECCs, but also for LECC Chairs, EAS originators and anyone involved with EAS in Washington state; to help inform them about the roles, responsibilities, and some of the resources available to those involved in alerting and warning the public. New in this version of Tab 24 is information on the SECC-WA listserv or remailer, WEMD and the posting of Local Area Plans, and Local Relay Networks. Also new is a link to Part 11 of the Federal Communications Commission's rules governing the EAS. The rule regarding EAS equipment operating in automatic mode, along with the Commission's designation of Local Primary (LP) stations is included in this version of Tab 24.

## LECC COMPOSITION

The composition of an LECC is determined by its members, insuring there is adequate representation in any local public alert and warning planning.

LECC membership is usually comprised of representatives from within the Operational Area. It can include individuals from city and tribal governments, local and military emergency management, law enforcement, fire departments, and 911 Centers (also known as Public Safety Answering Points or PSAPs). LECCs can also include management and technical representatives from radio and TV broadcast stations, cable companies, landline and wireless carriers. Other entities such as local and state transportation agencies, industrial facilities, amateur radio groups and disaster relief organizations can also be part of an LECC.

## LECC ORGANIZATIONAL STRUCTURE

Administering an LECC shouldn't be the job of one person. Optimally, tasks and responsibilities are spread among the committee members, assuring involvement by more than one individual. However, it is not unusual for one or two persons to perform multiple tasks for the committee. Here are four recommendations for the organizational structure of an LECC:

**Chair**: This officer is responsible for conducting meetings and is also the primary contact person for the committee. LECC Chairs are automatically members of the SECC, and act as liaisons between the LECC and the SECC.

**Vice-Chair**: This officer acts as Chair when the Chair is not available.

**Administrative Assistant**: Duties can include providing a written record of meetings and maintaining the roster of members.

**Technical Officer**. This officer would be assigned to resolve select technical issues. This individual is usually responsible for maintenance and operation of any Local Relay Network (LRN) systems within the Operational Area. See the section on page 8 that describes **Local Relay Networks (LRNs)** in more detail.

## LECC MEETINGS

LECC Chairs are encouraged to have the committee meet at regular intervals. If travel time and other conflicts are an issue, meetings can be conducted using conference calls or web hosted meeting services. Ideally, LECC meetings are scheduled so they don't conflict with SECC meetings, which are normally held in January, March, May, July, September, and November.

## LECCs AND PUBLIC RELATIONS

LECC Chairs and committee members are encouraged to utilize the assistance of print and electronic outlets, social media platforms and other avenues to inform the public of their work. A topical message to residents living within the Operational Area could be a basic primer on EAS and other public alert and warning systems. In cooperation with local emergency management, a very relevant message would be how those residents can sign up to receive emergency alerts on their mobile devices.

## LECC CHAIR: EFFECTIVE COMMUNICATIONS

It is the responsibility of the LECC Chair to ensure that EAS and related systems work as well as they can within their Operational Area. Part of that process is to promote effective communication with all the stakeholders in the area. Stakeholders include emergency managers, 911 directors, radio and TV broadcasters, cable systems, wireless carriers, and other relevant entities within the Operational Area. This communication can be accomplished by email, text messages, phone calls and by having occasional in-person visits and meetings with those stakeholders. Listening to and communicating effectively with others are important tools for the LECC Chair.

## THE EAS LISTSERVS OR REMAILERS

LECC Chairs can find assistance for some EAS issues by utilizing the Washington EAS listserv or remailer. This remailer (sometimes referred to as 'EAS-WA') serves as a forum for information exchange primarily having to do with Washington state EAS matters. It's a venue for asking questions and receiving answers to technical or other EAS related matters. EAS-WA is also used to distribute the Required Monthly Test (RMT) schedule, and for the SECC Chair to notify users of upcoming SECC meetings and circulate SECC meeting agendas. Sign up for EAS-WA at the following link: http://sea.sbe16.org/mailman/listinfo/eas-wa

Once subscribed, use the email address eas-wa@sbe16.org for posting messages. LECC Chairs are welcome to use EAS-WA to make meeting announcements, ask questions, make requests for support, distribute minutes, and other communications deemed appropriate by the SECC. **DO NOT CC** more than one address when using the remailer – messages will likely get bounced. NOTE: EAS-WA subscribers may choose to receive individual messages, or a digest of messages at the end of the day. The latter option keeps inboxes uncluttered, **but the digest DOES NOT include attachments, such as the Required Monthly Test (RMT) schedule.**

SECC-WA is a separate remailer meant for the distribution of more comprehensive information than EAS-WA. SECC-WA is the place to post articles and other communications related to alert and warning. This remailer also includes routine SECC business, such as the posting of Washington State EAS Plan Tab updates. Posts to EAS-WA are automatically re-posted to SECC-WA, so you only need to subscribe to one of them. Signup for SECC-WA at: http://sea.sbe16.org/mailman/listinfo/secc-wa.

The address for posting messages to SECC-WA is: secc-wa@sbe16.org. Just like the EAS remailer, **DO NOT CC** more than one address when posting to SECC-WA.

**The EAS-WA and SECC-WA remailers are NOT for the exclusive use of LECC Chairs. Individuals such as emergency managers, Radio, TV and cable operations and technical personnel, EAS equipment representatives; i.e. anyone with a legitimate stake in EAS activities associated with Washington state, as determined by the remailer's administrator, may subscribe to and use both remailers.**

## LECC CHAIRS, LOCAL AREA AGENCIES AND REQUIRED MONTHLY TESTS

Another responsibility of the LECC Chair is to remind EAS originators (a.k.a. Local Area Agencies) within the Operational Area when they're scheduled to send Required Monthly Tests (RMTs). Note the following language, from the Washington State EAS Plan Tab 11-A, giving Local Area Agencies, such as 911 Centers, Emergency Operation Centers (EOCs), Emergency Coordination Centers (ECCs), and to a lesser extent LECC Chairs, the authority to make sure an RMT doesn't fall through the cracks:

'In the event a Local Area Agency is unable to originate a scheduled RMT, it will contact the Washington State Emergency Operations Center (1-800-258-5990) at least 3 business days in advance and specify the necessary language (e.g. English, Spanish, etc.), the exact wording of the message, and the FIPS (Federal Information Processing Standard) codes needed to originate the RMT on the agency's behalf. If possible, the Local Area Agency will also supply a recorded .mp3 audio message to be used by the State EOC. The Local Area Agency may also request that the State EOC use its own recorded audio message. The State EOC will confirm language, message wording, and FIPS codes with the agency prior to originating the substitute RMT. LECC Chairs may also contact the State EOC to request assistance in generating the substitute RMT and verify with the State EOC that the substitute RMT has been scheduled.'

Tab 11-A also includes this language pertaining to failed RMTs:

'If an RMT fails and the originator is quickly able to correct the problem, the originator may resend the RMT, but only up to 15 minutes later than the scheduled time.

After the 15-minute period, the RMT is considered to have failed and will not be resent. In the event of a failed RMT (as described above), the originator will determine the cause of the failure and post the explanation of the failure on the EAS remailer (eas-wa@sbe16.org) so that broadcasters can properly note the reason for the failure in their station logs.' See Tab 11-A in its entirety for more RMT Procedures information.

In the event of a failed RMT, LECC Chairs can work in conjunction with originators and troubleshoot RMTs when there are problems. Communications from the LECC Chair about the failure to relaying stations within the Operational Area or to either remailer

asking for assistance can be helpful in running down such problems. The goal is a satisfactory resolution to any alerting messaging issues prior to an actual emergency.

## RECOMMENDATIONS FOR THE LECC CHAIR

LECC Chairs should read and review the Washington State EAS Plan at the following link and become familiar with the Tabs that make up the plan:

https://mil.wa.gov/emergency-alert-system-eas-state-plan

LECC Chairs and anyone involved with EAS should become familiar with Part 11 of the Federal Communications Commission's rules governing the Emergency Alert System by using this link to the Electronic Code of Federal Regulations (e-CFR):

https://tinyurl.com/rphcae5

LECC Chairs or anyone interested in learning more about IPAWS (Integrated Public Alert and Warning System) are encouraged to take the online Independent Study course IS247.A 'Integrated Public Alert and Warning System (IPAWS)' and other IPAWS related courses provided by FEMA at this link:

https://training.fema.gov/is/crslist.aspx

## LECCs AND LOCAL AREA PLANS

As previously noted, an important duty of LECCs is to develop, maintain and periodically update a Local Area Plan. LECCs are encouraged to include Limited English Proficiency (LEP) populations as they develop and implement their local alert and warning procedures described in their plan. **Local Area Plans are active documents and are at their most effective when kept current**.

Local Area Plans contain procedures for local officials to transmit emergency information to the public during a local emergency. These plans should spell out in detail when alert and warning systems are to be used and how to use them. These systems can include EAS (either via legacy or Common Alerting Protocol; CAP), IPAWS, WEA, 'front end' software-based systems such as RAVE, Alert Sense and Code Red, social media, automatic telephone messaging, emails, text messaging and mobile apps.

## LOCAL AREA PLAN STRUCTURE RECOMMENDATIONS

When the Washington State EAS Plan was being developed, it was designed to be placed in a three-ring binder and consist of two major segments: (1) the plan's policy narrative and (2) a series of Tabs containing specific information; some that was subject

to updates and changes. This eliminated the need to duplicate the entire plan each time a modification was made.

LECCs that need to update or create a new Local Area Plan can alternatively develop a (1) Basic Plan that contains the policy narrative that essentially remains unchanged along with (2) a series of Appendices or Annexes that have specific information that can be updated as needed. The benefits are the same: there is no need to duplicate the entire plan each time modifications are made.

Sample Local Area Plans can be researched on the internet. Start by searching 'Local Area EAS Plans' and 'State EAS Plans.'

## LOCAL AREA PLAN CONTENT RECOMMENDATIONS

1. An explanation of the Local Area Plan. The mission is to develop a document that anyone can read and then understand how the alerting systems work within the Operational Area.

2. A roster of all members of the LECC, using the Washington State EAS Plan Tabs 1-A or 2 as models.

3. A list of who is authorized to initiate public alert and warning messages within the Operational Area.

4. A section showing the various public alert and warning systems, including when and how they are to be used.

5. A link to the Washington State EAS Plan. See Page 6 for that link.

6. A section for any Tab or Tabs contained within Washington State EAS Plan that are deemed to be relevant by the LECC.

7. Other documents determined to be helpful and appropriate by the LECC in order to further explain its Local Area Plan.

## WEMD AND THE POSTING OF LOCAL AREA PLANS

Whether or not an LECC has a web presence, WEMD will either post links to Local Area Plans or host the plans on the Washington State EAS website in PDF form. Links or plans in WORD or PDF form are to be sent directly to Chris Utzinger, his successor or designee at WEMD, and come from either the LECC Chair or from another verifiable individual within the LECC. Local Area Plans no longer require approval by the SECC. Once posted by WEMD, the LECC Chair or their designee will notify the SECC that the Local Area Plan is available for viewing on-line. Any sensitive contact information contained in the plan should not be sent to WEMD for eventual viewing on-line.

## LOCAL RELAY NETWORKS (LRNs)

Local Relay Networks (LRNs) are legacy analog EAS systems. They are one of the sources available for receiving EAS messaging for the Operational Area. LRNs were at one time the primary means to distribute EAS messages from Local Area Agencies to EAS Participants. EAS Participants are defined in part by the FCC as 'entities required under the Commission's rules to comply with EAS rules, e.g. analog radio and television stations, wired and wireless cable television systems...DAB (Digital Audio Broadcasting)….and wireline video systems.' The importance of LRNs has been diminished with the advent of internet based EAS message distribution systems. However, the relevancy of LRNs should not be overlooked as they may be the last way to distribute EAS messages from Local Area Agencies in the event of an internet failure.

The creation, maintenance and readiness of the LRN or LRNs within the Operational Area is the responsibility of the LECC. LRNs typically utilize Very High Frequency (VHF) or Ultra High Frequency (UHF) radio transmitters or repeaters to distribute EAS messages to properly equipped stations within the Operational Area.

## EMERGENCY MESSAGE DISTRIBUTION

There are three EAS message distribution methods used in each Operational Area:

**Messages via CAP and/or IPAWS:** These are messages initiated by a Local Area Agency utilizing CAP (Common Alerting Protocol) which are then distributed to EAS Participants via IPAWS (Integrated Public and Warning System) and/or the Washington State CAP System. These Emergency Notification Systems most often utilize the previously mentioned "front-end" software-based systems from a commercial vendor.

**Messages via Local Primary (LP):** These are messages initiated by a Local Area Agency with a device capable of generating a message utilizing the SAME (Specific Area Messaging Encoding) system. SAME is a protocol used for framing and classification of broadcast emergency warning messages. These messages are then sent to Local Primary entities, who are responsible for distribution to EAS Participants via an off-air monitoring arrangement. For more information on LP entities (stations) see **Local Primary (LP) Stations** on page 9.

**Messages via Local Relay Network (LRN):** These are messages initiated by a Local Area Agency. The messages are usually generated with a legacy Encoder/Decoder (ENDEC) that creates a message also using the SAME system. These messages are then distributed to EAS Participants as described above under **Local Relay Networks (LRNs).**

## EAS EQUIPMENT IN AUTOMATIC MODE

The LECC and/or its technical officer may find it beneficial to understand that some broadcast stations may be operating unattended during certain times with their EAS equipment in automatic mode. To better understand how tests and messages are to be handled by these facilities while operating in this mode, the following information from Part 11.51 [m,1] of the FCC's EAS rules may be helpful:

'Automatic interrupt of programming and transmission of EAS messages are required when facilities are unattended. Automatic transmissions must include a permanent record that contains at a minimum the following information: Originator, Event, Location and valid time period of the message. The (facility's) decoder performs the functions necessary to determine which EAS messages are automatically transmitted by the (facility's) encoder.'

## LOCAL PRIMARY (LP) STATIONS

The FCC designates LP stations in Part 11.18 [f] of their EAS rules in the following terms:

'A Local Primary (LP) is an entity that serves as a monitoring assignment for other EAS Participants within the state. LP sources may be assigned numbers (e.g. LP-1,2,3) and are relied on as monitoring sources by other EAS Participants in the Local Area. An LP may monitor any other station, including another LP, so long as doing so avoids a single point of failure in the alert distribution hierarchy.'

In Washington state, LP stations should be monitoring at least two sources of Emergency Action Notifications (EANs)/Presidential Alert Messages. An example of this type of source would be a Primary Entry Point (PEP) station. PEPs are the primary source of initial broadcast for a Presidential Alert. Other sources of EANs/Presidential Alert Messages are National Public Radio's Squawk channel, Premiere Networks' FEMA channel, and Sirius/XM Satellite's Barker channel.

## SELECTING A NEW OR DIFFERENT LP

LECCs may have to select a station (or stations) to function as a new or different LP for the Operational Area. If that does occur, the following information is designed to assist in the process. Choosing an LP is based on several factors, and there are some important elements to consider. Regardless if it's one station or more involved in the process, prospective LP stations should meet the following standards. If multiple stations are involved, the LECC may assign LP-1 status to the station with the higher set of standards; the station with the next highest set of standards would typically then become the LP-2, etc.

What follows are some standards to consider when selecting a new or replacement LP station:

**Hours of Operation:** Public alert and warning messages require around the clock delivery; consequently, prospective LP stations must operate continuously. This eliminates consideration of stations that go off the air at a certain hour or operate during daylight hours only.

**Coverage:** LP stations are relied on as monitoring sources by other EAS Participants in the Operational Area. Prospective LP stations must have the ability to provide coverage to most of, if not the entire, Operational Area to reliably accomplish this task. Note that many AM broadcast stations either reduce power or use a directional antenna system at night that may limit their ability to adequately serve the Operational Area during hours of darkness.

**Level of Cooperation:** Prospective LP stations are encouraged to monitor more than a minimum number of sources and include any LRNs, the SRN (State Relay Network) and NOAA weather radio. They should also actively participate in the distribution of public alert and warning messages for the Operational Area.

**Required Equipment:** Prospective LP stations should already have or be willing to acquire equipment such as additional receivers that are necessary to monitor multiple sources.

**Redundancy and Backup Equipment:** Being able to fulfill the function of an LP station during adverse conditions is a plus. Prospective LP stations must have adequate redundant and backup capabilities in order to maintain operations if some or all their primary systems fail.

**Auxiliary Power:** Emergency power generation for an LP station to maintain service during times of power outages is a must. It is imperative that prospective LP stations (1) have auxiliary power at their studio and transmitter locations, (2) can operate without commercial power for extended periods of time and (3) don’t have to be frequently re-supplied with fuel.

**Co-Owned and Co-Located LP stations:** When reviewing prospective LPs, those that are co-owned and/or co-located may not be adequate in providing a robust way to distribute National EAS messages to the Operational Area. The capabilities of their facilities should be known upfront before considering them as a new or different LP.

**Station Survivability:** The survivability of a station's infrastructure must be seriously considered in choosing an LP station. For example, prospective LP stations in areas that experience flooding and slides should be located on high ground and away from slide-prone areas.

**Once a decision is made by the LECC to select a new or different LP station (or stations) for an Operational Area, that decision must be conveyed to the SECC for approval and eventual inclusion in either Tab 5 (Western Washington Matrix) or Tab 6 (Eastern Washington Matrix) of the Washington State EAS Plan**.

## TAB 24-GOING FORWARD

As is the case with the Tabs used within the Washington State EAS Plan, Tab 24 and its successor WA-PAWS Tab D-1 can be changed, updated and improved. All such changes will be subject to the review of all EAS Participants operating in accordance with the Washington State EAS Plan and the approval of the SECC.