

PARTNERSHIP FOR
PUBLICWARNING

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October 2, 2003

Mr. Allen Wyke, Chair
OASIS Emergency Management Technical Committee
c/o Blue292, Inc.
2505 Meridian Parkway, Suite 325
Durham, NC 27713

Dear Mr. Wyke:

I am writing you to express the support of the Partnership for Public Warning for the development of an all-hazards, all-media Common Alerting Protocol (CAP), and to offer a specific comment and recommendation as the CAP standard moves toward finalization.

The Partnership for Public Warning (PPW) is a national non-profit (501c3) association representing industry, government and academic stakeholders in the development, deployment and operation of effective public warning systems. Since its formation in 2001 PPW has provided a national roundtable for discussion of public warning policies and practices with the Department of Homeland Security, the National Oceanic and Atmospheric Administration, the National Aeronautics and Space Administration and numerous state and local jurisdictions, as well as key academic researchers and, of course, industry implementers. PPW has published a series of groundbreaking studies and reports on public warning issues, including "*A National Strategy for Integrated Public Warning Policy and Capability*" and, more recently, a plan for implementing the national strategy entitled "*Implementing the Vision*."

PPW was proud to join the OASIS process and to sponsor the contribution of existing work on a Common Alerting Protocol for review and formalization. Our voting representative, Mr. Art Botterell, has taken an active role in your Committee's work while reporting to and taking guidance from the PPW Board of Trustees.

In our increasingly complex and risk-filled world, we believe the speedy deployment of an all-hazard Common Alerting Protocol usable over the widest possible range of media is essential to the enhancement of public warning, the preservation of lives, the protection of property, and the security of our nation. We applaud you and your Committee for making the CAP specification your first order of business, and thank you for all the hard work evident in the CAP Version 1.0 committee draft.

We have only one significant concern with the current draft. Broadcast media such as satellite and digital terrestrial broadcasting are expected to play a vital role in public warning systems in the near future. (One example of such media is the "datacast" capability inherent in the new generation of digital television systems currently being deployed nationwide.) Such systems may be essential components of future national, regional and even local public warning architectures.

Therefore we note with concern that the current CAP specification offers no specification as to how binary representations of photos, maps, audio or other "rich" presentation media can be transmitted over broadcast media. Such binary "assets" are required to making CAP fully flexible and to ensuring backward compatibility with existing systems such as the national Emergency Alert System. The current CAP draft specification relies on the ability of a receiving device to retrieve such binary content from a

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Uniform Resource Locator contained within the CAP XML message. Obviously, such "client-initiated" retrieval is impossible over a one-way broadcast link, so this has the practical effect of crippling broadcast-based systems using CAP, or at least of forcing them to depart from the CAP standard in unpredictable and potentially incompatible ways.

It has been suggested that such broadcast links can be treated as "private" networks and that therefore no standardization is required. However, we have been advised by industry implementers that they actually work in a multi-vendor environment and must have a standard to build against in this area if they are to embrace CAP.

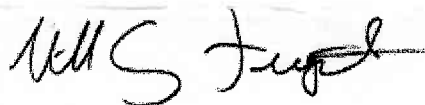
Fortunately, it appears this problem could easily be resolved by providing an explicit optional mechanism for including such binary content encoded as text within the CAP XML message, accompanied by restrictions on when that option should be used (e.g., only in broadcast applications) and perhaps even with a proviso that receivers not intended for use with broadcast links are not required to process such elements.

While we understand that this would mean a minor increase in the complexity of what is, at present, an extremely simple and straightforward standard, we note that this expedient is already widely used in XML systems and standards (e.g., in the W3C "vCard" RDF standard). More critically, it appears that the lack of some explicit provision for this functionality over broadcast links could result in broadcast warning system providers abandoning CAP and creating their own divergent standard. That would be profoundly regrettable.

Therefore the Partnership for Public Warning urges that the CAP Version 1.0 specification be amended to provide for an option as described above, or some equivalent explicit provision for the transmission of binary content along with CAP XML in a broadcast application.

Once again, thank you for the hard work and dedication that you and your colleagues have demonstrated in addressing the critical need for data systems interoperability for homeland security, emergency management and public warning.

Sincerely,



William Craig Fugate
Chair, Partnership for Public Warning

cc: Mr. Matt Walton, Chair, Emergency Interoperability Consortium
Mr. Art Botterell, PPW voting representative to OASIS