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**COMMENTS TO THE FEDERAL COMMUNICATIONS COMMISSION
FROM THE
U.S. COUNCIL OF THE INTERNATIONAL ASSOCIATION OF EMERGENCY MANAGERS
ON
SIMPLIFICATION OF MULTILINGUAL ALERTING BY THE EMERGENCY ALERT SYSTEM
PS DOCKET NO. 15-94**

The International Association of Emergency Managers (IAEM) agrees with the FCC’s concern that alerts and warnings issued over the Emergency Alert System (EAS) are accessible to as many people as possible, including for those whose primary language is not English. Through these comments to the EAS Multilingual Alerting NPRM (PS Docket No. 15-94), IAEM has several points we would like to address for consideration.

Any advancement and development in this area should be based on and supported by the work of socio-behavioral science and evidence-based research, began by Meliti & Sorensen (1990), and then continued by Bean, Kuligowski, Olson, Sutton, Waugh, Wood, and others. Specifically, work in this area should start by aligning all templates and message formats with the guidance offered in the Warning Lexicon (Sutton et al., 2024). Additionally, this would allow EAS messages to begin aligning with another FEMA Integrated Public Alert and Warning System (IPAWS) tool, the Wireless Emergency Alert (WEA). FEMA IPAWS commissioned Dr. Sutton and the University of Albany to create the Message Design Dashboard (MDD) based on the Warning Lexicon. To be considered complete, messages should have an authoritative source, a clear hazard combined with a confident impact statement, a specific location, simple-to-follow protective actions, and an element of time. The Warning Lexicon and the MDD use subject matter expertise and evidence-based research to produce complete and effective messages that increase understanding of the threat or hazard and provide clear protective actions that the public should take using clear, confident, and specific language that is free of jargon, technical terms, and acronyms. In fact, NWS messages already follow this standard. Aligning other alert and warning methods, like EAS, to this structure should be the first step in developing messages in more languages.

Once an updated standard message format is adopted, it would simplify the process of translating messages into the 13 most commonly spoken other-than-English languages in the United States.

Additionally, it must be acknowledged that American Sign Language (ASL) is the third most “used” (as opposed to “spoken”) language in the United States after English and Spanish. As such, we urge the FCC to also account for effective and timely emergency communication to this language community as well. From this point, it is recommended that experts in these languages be recruited based on their ability to translate complex situations into easy-to-understand phrases. It is also recommended that these experts have experience in crisis communications. When an appropriate cadre has been convened, they should first be instructed on the socio-behavioral foundations of effective message writing as established in the Warning Lexicon and as used by the MDD to ensure they understand why the structure and concepts that are provided are proven to increase the public's decision to take action rather than seek more information or ignore the message completely.

It is well documented that English does not translate to other languages word-for-word. With that in mind, the translators as subject experts should work with alert and warning SMEs to break down the key message components from the Warning Lexicon, specifically the Hazards, Impact Statements, and Protective Actions, into similar words or short phrases that carry the same meaning in the intended language while maintaining the shortest character count possible.

It is not recommended that Artificial Intelligence (AI) or other automated means be used to translate these messages quickly. Large Language Models and similar tools currently lack the ability to appropriately simplify direct translation while maintaining nuance and the sense of urgency.

In summary, it is the opinion of IAEM that the FCC start by creating a standardized message structure, based on the Warning Lexicon and using the IPAWS MDD. From there, customizable or fillable templates should be created based on direct translation by experts in the specific language that focuses on the hazards, impacts, and protective actions. This would then give message originators an easy place to start with building their full warning template library with messages that are consistent and applicable nationally and based on subject matter input and evidence-based research.

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