Further comments in addition to those submitted on Sep 25, 2008

- VII.C Testing values. Are there recommended values for the EAS-ORG and EAS-STN-ID parameters that should be used for testing and development?
- VII.C.1 EAS-ORG codes. Will the originator codes be used for filtering messages by source?
- VII.C.3 County location FIPS code. When a message is issued statewide, is the use of a single FIPS state location code acceptable, or must every county level code for that state be used? Are FIPS MSA's allowed?
- VII.E Audio file size. Is there a size limit to files either referenced via the CAP uri element or embedded using derefUri? Are there concerns about allowing streaming audio when the length and size of this audio and any potential transmission delays are unknown?
- VII.E.2 resourceDesc. Is the resourceDesc value case sensitive?

VIII.N.10 - 200 word limit. In limited testing of the EAS-CAP profile we found difficulties in implementing the 200 word limit.

Further elaboration on the sentence created in VIII.N.1 is needed. Is there a need to limit the size of this sentence due to the 200 word overall limit? Also reading the FCC rules online the rule referenced in VIII.N.1 seems to only apply to television broadcasts and not to radio. If this is the case, then should there be different versions or is this an attempt to harmonize the content for all broadcast methods?

Also in testing we found the 200 word limit was frequently reached when the phrase creation rules of VIII.N were applied. This was due to the fact the CAP description element is included because this element normally has a lot of text. This lead to these messages having the ellipsis added to the EAS text and end-users noticed this and voiced concerns that an important part of the message was potentially missing. On occasion text-to-speech software encountered problems with the ellipsis.