

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of	)	
	)	
Resilient Networks	)	PS Docket No. 21-346
	)	
Amendments to Part 4 of the Commission's Rules	)	PS Docket No. 15-80
Concerning Disruptions to Communications	)	
	)	
New Part 4 of the Commission's Rules	)	ET Docket No. 04-35
Concerning Disruptions to Communications	)	

**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)¹ generally supports the proposals in the above-captioned Third Further Notice of Proposed Rulemaking that seek to modernize the Disaster Information Reporting System (DIRS).² As the most reliable, trusted source for timely emergency news and information, television and radio broadcasters appreciate the opportunity to comment on the Notice.

As a preliminary matter, NAB applauds the FCC for not pursuing its earlier ill-advised proposal to mandate that all broadcast stations file reports in DIRS, when the system is activated.³ We stand by our view that such a change would impede broadcast staff from

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, Third Further Notice of Proposed Rulemaking and Order on Reconsideration, PS Docket Nos. 21-346 and 15-80; ET Docket No. 04-35 (rel. Aug. 6, 2025) (Notice).

³ *Resilient Networks; Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications; New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, Second Report and Order and Second Further Notice of

their core responsibilities during an emergency to maintain operations and provide timely news and information to the public.⁴

Regarding the Notice, NAB supports the Commission's aim to streamline DIRS reporting for manual filers. Although most radio and television stations typically use only one of the ten different DIRS worksheets referenced in the Notice, we appreciate the FCC's proposed redesign that would offer other DIRS filers the ability to file a single, dynamic form instead of multiple worksheets concerning different types of services and infrastructure.⁵ This approach will facilitate filing in DIRS during a disaster.

We also support the proposal to update DIRS to include a "one-click" option for filers to indicate that there is no change in their operational status from the preceding day's DIRS report.⁶ This change will simplify filing for DIRS filers that have already submitted reports. Similarly, in early 2024, NAB proposed that broadcasters should be able to file initial DIRS reports through a one-click process that indicates whether they are operational or not, and leave it to stations that are inoperable whether to provide additional information or request assistance.⁷ NAB believes that allowing this option would facilitate broadcasters' voluntary participation in DIRS, especially smaller stations.⁸

NAB also asked the FCC to consider developing a DIRS app or a more mobile-friendly website that would allow filings by stations that only have Internet access via a

Proposed Rulemaking, PS Docket Nos. 21-346 and 15-80; ET Docket No. 04-35, (Second Report and Order), 39 FCC Rcd 623, 643-46 (2024).

⁴ Comments of the National Association of Broadcasters, PS Docket Nos. 21-346 and 15-80; ET Docket No. 04-35 (May 13, 2024) (NAB 2024 DIRS Comments), at 6-12.

⁵ Notice at ¶ 10.

⁶ *Id.* at ¶ 11.

⁷ NAB 2024 DIRS Comments at 5 and 16.

⁸ Notice at ¶ 14 (seeking comment on other ways the FCC can modify the reporting process to reduce compliance burdens for smaller providers).

smartphone.⁹ Broadcast staff are often “on the go” during a disaster, so simplified mobile access to DIRS could also facilitate participation. NAB respectfully renews our requests for FCC consideration of both of these suggestions.

NAB appreciates the FCC’s desire to encourage more emergency management agencies to participate in the DIRS information sharing program.¹⁰ Despite that noble goal, however, NAB opposes accomplishing that aim by making data more widely available to the public or narrowing the presumption of confidentiality that governs DIRS information.¹¹ Specifically, we disagree with the suggestion that increasing the transparency of filers’ data will spur competition between providers.¹² Broadcast stations already compete vigorously for viewers and listeners based on their operational reliability during a disaster, as well as the quality of their emergency news coverage. Nothing could incentivize stations more than being on air and seen by the public, so releasing additional form data would not even register in the already hyper-competitive marketplace.

⁹ *Id.* at 16; Comments of the National Association of Broadcasters at 3-8, PS Docket Nos. 21-346 and 15-80, and ET Docket No. 04-35 (Dec. 16, 2021), at 8-9.

¹⁰ Notice at ¶¶ 23-25.

¹¹ *Id.* at ¶ 25

¹² *Id.*

NAB appreciates the Commission's effort to streamline DIRS reporting and looks forward to working with the Commission on implementing updates to the system.

Respectfully submitted,

 

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