

FEDERAL COMMUNICATIONS COMMISSION
Disability Advisory Committee
Comments on PS Docket No. 15-91 on Improving Wireless Emergency
Alerts and Community-Initiated Alerting

A recommendation from the Federal Communications Commission (FCC) Disability Advisory Committee (DAC) regarding proposed DAC Comments on PS Docket No. 15-91 on Improving Wireless Emergency Alerts (WEA) and Community-Initiated Alerting (CIA), Notice of Proposed Rulemaking (NPRM), released November 19, 2015.

On June 23, 2015 the DAC was pleased to endorse the Communications Security, Reliability and Interoperability Council (CSRIC IV) October 14, 2014 Report.

The DAC commends the efforts of the FCC to seek comment on further enhancements to the Wireless Emergency Alert (“WEA”) system.

The WEA system exemplifies a highly successful public-private partnership, which has benefited consumers in countless ways, including by rescuing abducted children and protecting the lives of those exposed to sudden and devastating weather and manmade disasters.

The DAC appreciates that the wireless industry has worked diligently to develop and deploy WEA capability, to ensure that alert originators and the ultimate beneficiaries, subscribers, may compose and receive meaningful emergency information in a timely manner.

The DAC recognizes reasonable enhancements to the WEA system may assist WEA alerting originators to improve the ability to warn the public in the U.S. and U.S. Territories. The DAC supports consideration of new rules to further enable people with disabilities to have better access to information and wishes to offer insight as it pertains to comments filed with the FCC on the NPRM for Docket Number 15-91.

The DAC understands that several recommendations may implicate changes to relevant technical standards and specifications, and may require standards development; therefore, it is recommended that any compliance deadlines should be factored in with the completion of such and public release of final standards.

Increasing Maximum WEA Character Length

The FCC NPRM proposes to extend the character limit for those networks and devices for which it is technically feasible to deliver and process 360 character messages, while continuing to allow the delivery of 90-character messages on 2G and 3G networks and devices.

The DAC continues to support the increase to 360 characters for capable wireless handsets, where technically feasible and consistent with the recommendations of the FCC’s Communications Security, Reliability and Interoperability Council (CSRIC) IV and the Alliance for Telecommunications Industry Solutions (ATIS).

Classifying Emergency Government Information

The FCC NPRM seeks comment on the proposed definition of Emergency Government Information, and on whether enabling the delivery of Emergency Government Information messages would expand the alerting toolkit available to government entities; costs, authorities; and any additional classifications of alerts. We seek comment on how we can ensure that Emergency Government Information messages are used appropriately and in circumstances where they would be most effective at precipitating protective action.

The DAC supports the expanded definition of “Emergency Government Information,” without adding additional categories, and should not structure it in a way that local emergency management authorities could not determine when it is necessary to warn regarding imminent threats to life or property. This flexibility is critical to allow for the needs of local authorities.

Embedding Telephone Numbers and URLs

The FCC seeks comments on CSRIC IV’s assertion; that technical challenges would need to be addressed to support the synchronized push of content to be stored in cache for all URL links used in WEA CAP messages? We also seek comment on the efficacy of using embedded URLs to enhance accessibility of WEA for people with disabilities, senior citizens and persons with limited English proficiency, in addition to the general public.

The DAC believes that providing the ability to access additional content by embedding telephone numbers and URLs to a WEA will be helpful to people with disabilities who need to be able to receive emergency information in ways that meet diverse needs. For example, local alert originators could embed URLs in WEA messages that direct general readers including individuals with disabilities as well as deaf or hard of hearing consumers to a specific website for further information or instruction. This instruction may include various languages and video clips in American Sign Language (ASL). In addition, the DAC recognizes that access to additional content through embedded resources in a WEA could help consumers, particularly people with disabilities, take action more quickly.

The CSRIC IV report notes that further study is needed on the potential impacts to network congestion, positive and negative, that may result from enabling embedded telephone numbers and URLs into a WEA message.¹ Therefore, the *DAC recommends* that the FCC request subject matter experts (e.g. ATIS) to further examine and explore the details of enabling local alert originators to embed telephone numbers and URLs in WEA messages, and report back to the FCC within a reasonable specified timeframe.

Multimedia Alerting

We seek comment on timeframes within which it would be reasonable to expect Participating Commercial Mobile Service (CMS) Providers to support WEA messages that contain multimedia.

¹ Communications Security, Reliability, and Interoperability Council (CSRIC) Working Group 2 Geographic Targeting, Message Content and Character Limitation Subgroup Report at 35-36 (Oct. 2014), available at https://transition.fcc.gov/pshs/advisory/csric4/CSRIC_CMAS_Geo-Target_Msg_Content_Msg_Len_Rpt_Final.pdf

The CSRIC IV WEA Working Group states *there have been no discussions on “multimedia alerting” other than the discussion of the use of URLs and phone numbers (see above category)*. The DAC recognizes the benefits of URLs and phone numbers in WEA messages that would allow the consumer to take further action to obtain additional critical information, subject to an appropriate evaluation of the technical feasibility, including wireless network impacts, of embedding additional content in WEA messages.

Multilingual Alerting

The FCC seeks comment on the technical implications and potential costs of supporting multilingual WEA alerts. We seek comment on how much additional data, if any, would be necessary to support additional languages and/or character sets in WEA.

The DAC respectfully defers to entities that have the expertise related to this issue (Data Requirements), but recognizes the importance of multilingual messaging specifically as it applied to individuals with Limited English Proficiency communities (LEP). While it would seem beneficial for WEA to include means and methods to deliver messages to people with limited English proficiency, the DAC defers to the views of local alert originators on the need for multilingual WEA messages and recommends that the FCC encourage the appropriate technical experts to evaluate the technical feasibility of enabling the end user to select a preferred language for WEA message display on a WEA-capable wireless handset.

WEA Geo-targeting

The FCC proposes to revise the Commission’s rules to require that Participating CMS Providers must transmit any alert message that is specified by a geocode, circle, or polygon to a target area not larger than the specified geocode, circle, or polygon. If, however, the Participating CMS Provider cannot broadcast the alert to an area that accurately matches the target area, we propose that a Participating CMS Provider may transmit an Alert Message to an area that closely approximates the target area, but in any case not exceeding the propagation area of a single transmission site. In this regard, as a backstop, Participating CMS Providers would be permitted to geo-target WEA alerts with the same level of granularity currently allowed by our WEA rules.

While most participating CMS providers supporting WEA currently support polygon level geo-targeting, there are technical limitations to cell and sector based WEA geo-targeting based on cell density, location, terrain propagation and other factors. The DAC supports the goal of more granularly targeted WEA messages and encourages CMS providers to continue to work to enhance the accuracy and granularity supported by carrier systems that approximate the targeted areas as closely as technically feasible.

Adopting State and Local WEA Testing and Proficiency Training

The FCC proposes to add a new Section 10.350(c) to the WEA rules to require Participating CMS Providers to ensure their systems support the receipt of “State/Local WEA Tests” from the Federal Alert Gateway Administrator, and to distribute such tests to the desired test area in a manner consistent with Section 10.450 of the rules. We seek comment on our analysis.

The DAC supports State, Local, and U.S. Territories WEA testing as proposed above. The importance of training for emergency managers and the whole communities that they support cannot be overstated. These training opportunities help to ensure that Emergency Managers have

taken the appropriate steps to identify at-risk members of their local communities and develop methodologies to ensure that WEA message content and operational procedures reflect a well-practiced and thorough understanding of the needs of their community members. As a result, Emergency Managers must have the capability to conduct periodic System and Messaging tests. These tests will ensure that not only are WEA messages crafted and disseminated in a timely and efficient manner, but that the content of those messages are developed in a way so that they are clear, concise and can be easily understood and acted upon by the whole community. It is recommended that the FCC work with Federal Emergency Management Agency (FEMA) to define the process for proficiency training and help identify best practices for WEA message development.

Participating CMS Providers & Subscribers

The FCC seeks comment on multiple areas that could increase participation in sending and receiving WEAs.

The DAC recognizes that the WEA system is a voluntary emergency alerting system for CMS providers and local alert originators. This framework has successfully led to participation from CMS providers serving 98% of U.S. consumers and hundreds of local alert originators, but there may also be certain areas in the U.S. and U.S. Territories, such as American Samoa, where CMS providers and local alert originators are not participating in WEA. The DAC is concerned about the lack of WEA support in areas where people with disabilities could benefit from WEA messages. The DAC recommends that the FCC work with non-participating CMS providers and state and federal emergency alerting authorities to ensure that citizens throughout the U.S. and U.S. Territories can benefit from WEA.

WEA Attention Signals and Public Service Announcements

The FCC seeks comment on a proposal to amend our rules to allow federal, state and local governments to use the attention signal common to EAS and WEA to raise public awareness about WEA, provided the relevant entity makes it clear that the WEA Attention Signal is being used in the context of the PSA, “and for the purpose of educating the viewing or listening public about the functions of their WEA-capable mobile devices and the WEA program,” including by explicitly stating that the WEA attention signal is being used in the context of a PSA for the purpose of educating the public about WEA.

The DAC recognizes the importance for citizens to be aware of WEA and alerts that are available to the public, and encourages the FCC to allow federal, state and local governments to take steps to raise awareness about the WEA-capable devices and the program, through the attention signal common to EAS and WEA, to raise public awareness about WEA. Any amendment should also take into consideration the need for obtaining said information in multiple formats, for people who have varying disabilities.

Participating CMS Provider Election Process

WEA rules allow Participating CMS Providers to elect to transmit WEA alert messages “in a manner consistent with the technical standards, protocols, procedures, and other technical requirements implemented by the Commission.” The WEA rules also allow Participating CMS Providers to withdraw their election to participate in WEA “without regulatory penalty or

forfeiture.

In light of the rapid deployment of smart handsets and 4G technology as discussed above, we believe that the statutory provisions giving rise to WEA authorize the Commission to continue to take a leadership role, in cooperation with other federal entities, states, localities and Participating CMS Providers, to promote the continued effectiveness of WEA as a technologically current element of the nation's overall alerting strategy. We also believe that competitive forces provide Participating CMS Providers with strong incentives to continue to transmit emergency alerts to consumer mobile devices and that these market incentives, along with the public safety benefits we expect to result from these proposed rules, provide a strong argument for continued participation in WEA. We seek comment on our analysis, as well as CSRIC IV's recommendation to allow Participating CMS Providers to offer WEA pursuant to different requirements.

Consumers have benefited from the ongoing, collective efforts of the wireless industry, as well as FEMA, the Department of Homeland Security's Science & Technology Directorate, the National Center for Missing and Exploited Children, alert originators, and numerous consumer groups. The DAC encourages this continued synergy to publicly analyze possible improvements to the WEA system by addressing and resolving difficult technical issues as ideas arise.