



Robert G. Morse
Associate General Counsel
Federal Regulatory and Legal Affairs

1300 I Street, NW, Suite 500 East
Washington, DC 20005
Phone 202.515.2444
Fax 202.289.6781
robert.morse@verizon.com

October 5, 2017

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Wireless Emergency Alerts
PS Docket No. 15-91**

Dear Ms. Dortch:

On October 3, 2017, Zenji Nakazawa, Legal Advisor for Chairman Pai, and I discussed the upcoming deadline for Commercial Mobile Service (CMS) providers to begin supporting embedded references in wireless emergency alerts. Verizon expects that its networks will be able to deliver alerts with an embedded reference (i.e. URL or phone number) “clickable” for the end user, to smartphones capable of processing them by November 1, as the rules require. *See* 47 C.F.R. § 10.441.

I explained that a number of handsets in use and in the marketplace today will not have this capability, including feature phones and some smartphone models, so it will be some time before it is uniformly available on consumers’ devices.¹ In addition, CTIA and others have raised valid concerns on the potential impact this requirement may have on network congestion, and explained the importance of guidelines for alert originators to properly configure their URLs and web servers.² More time would allow handset manufacturers to expand the capabilities of their devices while enabling FEMA and alert originators to establish practices and parameters for the use of URLs. But regardless of whether the Commission extends the deadline, it should reaffirm its expectation that FEMA and alert originators will ensure that these considerations are addressed before transmitting embedded references.³

¹ *See Wireless Emergency Alerts*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd. 11112, ¶ 33 (2016) (“*WEA Order*”) (citing CSRIC IV WEA Messaging Report at 42); CTIA, Ex Parte Letter, PS Docket No. 15-91, at 2 (Sept. 29, 2017); CTIA, Ex Parte Letter, PS Docket No. 15-91, at 2 (Aug. 17, 2017).

² *See* CTIA Petition for Reconsideration, at 3-5 (Dec. 1, 2016); CTIA August 17th Letter; *see also WEA Order* ¶¶ 32-33 (noting National Weather Service, NCMEC and FEMA support for limiting bandwidth requirements of embedded references).

³ *See WEA Order* ¶¶ 32-33.

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This letter is submitted in accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned if there are questions concerning this filing.

Sincerely,

A handwritten signature in blue ink, reading "Robert H. Morse". The signature is written in a cursive style with a large initial "R" and a stylized "M".

cc: Zenji Nakazawa