



Maricopa County

Department of Emergency Management

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9/4/2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Wireless Emergency Alert test for Palo Verde Generating Station PS Docket No. 15-91

Dear Mr. Wilhelm,

The Maricopa County Department of Emergency Management (MCDEM), which is the primary initiator of public alerts in Maricopa County using the Integrated Public Alert and Warning System (IPAWS), requests a Federal Communications Commission (FCC) rule waiver to allow two live tests of the Wireless Emergency Alert (WEA) system, the second test occurring approximately 30-minutes after the first and involving Commercial Mobile Service providers conducting business in the following localities:

004013 - Maricopa County, AZ

As proposed, and if approved, the tests will be conducted at ~12:00 p.m. and ~12:30 p.m. on November 13, 2019, targeting and corresponding with a scheduled annual test of sirens in the 10-mile radius or Emergency Planning Zone (EPZ) around our local nuclear power plant, Palo Verde Generating Station (PVGS). The WEA tests will be activated from Maricopa County's Emergency Operations Center and will use a live code for WEA. No back up dates are planned due to the desire to conduct these tests concurrently with the regularly scheduled siren tests.

The same WEA message is planned to be broadcast to cell phones located within the 10-mile EPZ around the PVGS for both the 12 p.m. and 12:30 p.m. tests. Note, all notifications to residents, businesses, agencies and local governments will include and highlight the fact that we will perform two (2) WEA tests approximately 30-minutes apart.

The text of each WEA test will read as follows, "THIS IS A TEST OF MARICOPA COUNTY WIRELESS EMERGENCY ALERT SYSTEM. NO ACTION IS REQUIRED." These tests will be the first live tests of the WEA system for Maricopa County and will be conducted in coordination with the State of Arizona and Arizona Public Service (majority owner of PVGS) to ascertain the reception and understanding of WEA messaging versus sonic means of notifications (sirens) in the event of a nuclear power plant emergency/incident. Further, these tests will enhance public safety by ensuring residents of Maricopa County and the areas around the nuclear generating station have fast, actionable, and credible information available to them in times of major emergencies. Given the critical need to expose the public to the diverse delivery methods of messages they may receive during a time of crisis, the potential lack of wireless coverage in the area and a transient and seasonal population in the area, MCDEM feels there is an urgent need to complete these tests using live testing.

MCDEM already has a campaign of working with local leadership, media representatives, and jurisdictional public information officers for the annual siren test. This campaign has expanded to social media, while maintaining public outreach through press releases, to ensure the public understands the need and value of the annual siren test and the new WEA tests. Notifications about these tests will be mailed to what we consider "west valley" mayors and staffs, which is all cities and towns from the City of Phoenix, west to PVGS. Notifications will go out to residents and businesses in the 10-mile radius of PVGS. Signs about the testing will also be posted throughout the 10-mile EPZ. As part of the regular drills and exercises with the nuclear generating station, all emergency alerting authorities that operate within or adjacent to the 10 mile planning zone including first responder organizations such as law enforcement, fire/EMS agencies, and public safety answering points (PSAPs), have been or will be informed of the siren and WEA tests to confirm to the public the WEA message is a test as well as the siren test. Additionally, notifications of this testing will be sent to the Emergency Managers of the two counties nearest to PVGS, La Paz and Yuma, both are approximately 27-miles from PVGS, putting them about 17-miles away from the leading edge of the notification polygon. All schools in and near the 10-mile EPZ will be notified, as well as requested to send notices, pre-scripted by MCDEM, to the parents of students attending those schools. MCDEM will also contact the cellphone companies servicing the area to ensure they are aware of the WEA tests and that their systems are ready. Static Variable Message Signboards along critical transportation corridors will notify the public of the annual siren test and WEA testing the day of the planned tests. Planning meetings are already or are being scheduled currently to address questions the public may have when calling in to a PSAP in regards to these tests. A list of these possible questions, as well as appropriate answers, will be compiled and provided to all of the aforementioned PSAPs.

MCDEM uses amateur radio volunteers to assist with reporting the status of each siren in real time during the siren testing and will add the status of receipt of the WEA messages to the reporting process for this test. Any issues that arise from the distribution and understanding of the WEA message will be compiled and made available to your office. Surveys will be distributed to the affected area through social media and selected stakeholders through email to assess the understanding and effectiveness of the WEA message. The 10-mile EPZ of PVGS is about 50 miles west of the majority of Metro Phoenix, MCDEM anticipates the WEA message will be received by the public both within and directly outside of the 10-mile EPZ as well as those traveling through the EPZ via a major transportation route, Interstate-10. MCDEM will address these issues, as well as the fact that some people may receive a single WEA message several times during our outreach campaign and interactions with the public.

For transitional or seasonal persons in the 10-mile EPZ, when the emergency PVGS sirens sound they may not know what it means. The WEA message will provide a quick validation or verification that something of importance is occurring and the message through WEA will tell them to turn on a radio or TV for further information. For testing of the WEA this is the best time of year to include transitional or temporary residents. In this area (southern Arizona), this is the time of year in-which temperatures have receded to a very temperate range. This will provide us an opportunity to educate temporary or seasonal residents about WEAs and evaluate (through survey) how we can improve our process.

If you have any questions or need further information, please contact Bruce Monson, Radiological Emergency Preparedness Planning Supervisor at bruce.monson@maricopa.gov or 602-273-1411. Thank you for your assistance. We look forward to hearing from you so we can continue with our planning for this important test.

Sincerely,



Robert Rowley