



January 3, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: City of Laguna Beach Wireless Emergency Alert Test – PS Docket No. 15-91

Dear Secretary Dortch:

This letter is to respectfully request a limited waiver of the Commission's Wireless Emergency Alert (WEA) rules to permit Participating Commercial Mobile Service (CMS) Providers to participate in a WEA test conducted by the City of Laguna Beach.

As proposed, and if approved, the test would be conducted on Wednesday, February 6, 2019 at 3:00 p.m. Pacific Standard Time, and would be targeted to the City of Laguna Beach. The text of the test will read as follows: **Laguna Beach Wireless Emergency Alert TEST. Details and feedback [www.lagunabeachcity.net](http://www.lagunabeachcity.net).**

The purpose of conducting the test at this time is to ensure that public officials in Laguna Beach have a clear understanding of how alerts would perform in our coastal community. The City of Laguna Beach hosts over 6 ½ million visitors per year and WEA is an excellent tool to reach visitors who most likely have not subscribed to our county's emergency alert system. Laguna Beach plans on conducting this test simultaneously with our neighboring City of Aliso Viejo, who is also submitting a WEA wavier.

Laguna Beach faces several natural hazards including wildfires, which because of the years of drought, the fire threat is higher-than-average. Laguna Beach is surrounded by wildland and over 90% of our community is within the Cal Fire Very High Fire Severity Zone (VHFSZ). In the event of a wildfire, evacuations in Laguna Beach would be necessary, and WEA would be a vital tool in communicating with our residents and visitors alike. Because of our threats, it is important that we test the system now, rather than waiting until May 2019 for the end-to-end testing. Additionally, we want our citizen's to be familiar with the format of a WEA message. For these reasons, we feel it is necessary to conduct a WEA test sooner than later.

In advance of the test, we will be conducting considerable public outreach to our community to inform them of the test. This outreach will include: press release, social media (Facebook, Twitter, Nextdoor), Nixle text messages, city website, broadcast on our local FM radio station KX 93.5, and electronic message boards.

We have developed a short, 4-question survey for citizens to fill out following the test, in order to capture data about the location reach, cell carrier, and the time they received the alert. We are happy to share the results of this survey with FEMA and the FCC.

We appreciate the opportunity to partner with the FCC and FEMA on this opportunity to test the WEA functionality in the Orange County coastal environment.

If you have any questions or need further information, please contact Jordan Villwock, Emergency Operations Coordinator, at [jvillwock@lagunabeachcity.net](mailto:jvillwock@lagunabeachcity.net) or (949) 497-0389.

Thank you for your consideration!

Sincerely,

A handwritten signature in blue ink, appearing to read "John Pietig", with a stylized, flowing script.

John Pietig  
City Manager  
City of Laguna Beach