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January 2, 2019

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

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

Dear Secretary Dortch:

This letter is to 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 Aliso Viejo.

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 Aliso Viejo. The text of the test will read as follows: **Aliso Viejo Wireless Emergency Alert TEST. Details and feedback** [www.cityofaliso Viejo.com](http://www.cityofaliso Viejo.com).

The purpose of conducting the test at this time is to ensure that public officials in Aliso Viejo have a clear understanding of how alerts will perform in our community. WEA is a critical tool to reach our 50,000 residents as well as visitors who most likely have not subscribed to our county's emergency alert system. Aliso Viejo plans on conducting this test simultaneous with our neighboring City of Laguna Beach, who is also submitting a WEA waiver.

Aliso Viejo faces several natural hazards including wildfire in the wildland area adjacent to the west side of the city, which is classified as a Cal Fire Very High Fire Severity Zone (VHFSZ). Because of the years of drought, the fire threat is higher-than-average. In the event of a wildfire, evacuations in Aliso Viejo would be necessary and WEA is a vital tool in communicating life safety information with our residents and visitors. Because of the threats, it is critical 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.

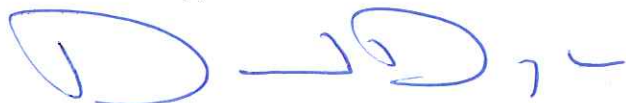
In advance of the test, we will be conducting considerable public outreach to our community to inform them of the test. This outreach will include: press releases, social media posts (Facebook, Twitter, Instagram, Nextdoor), Nixle text messages, city website posts, and outreach through our schools, churches, and Chamber of Commerce.

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 City of Aliso Viejo.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Doyle', with a stylized flourish at the end.

David Doyle  
City Manager  
City of Aliso Viejo