

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Wireless Emergency Alerts)	PS Docket No. 15-91
)	
Amendments to Part 11 of the Commission’s Rules)	PS Docket No. 15-94
Regarding the Emergency Alert System)	

OPPOSITION TO CTIA’S PETITION FOR RECONSIDERATION

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following opposition to CTIA’s Petition for Reconsideration in the above-captioned proceedings.¹

Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 27,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Public Safety Answering Points (PSAPs), radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

Throughout its advocacy in this proceeding, APCO has pointed to the many public safety benefits that enhancements to WEA would enable, including for 9-1-1 services across the country.² APCO has also encouraged the wireless industry to leverage the major advancements in wireless technology that have occurred since the initiation of WEA, as well as future 5G

¹ Wireless Emergency Alerts, Amendments to Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91 and 15- 94, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 16-127 (rel. Sept. 29, 2016) (“R&O”).

² Comments of APCO, Docket Nos. 15-91, 15-94 (filed Dec. 8, 2016); Ex Parte Letter of APCO, Docket No. 15-91 (filed Mar. 22, 2016); Comments of APCO, Docket No. 15-91 (filed Jan. 13, 2016).

technologies, to implement additional WEA features in reasonable timeframes. Against this background, APCO responds to CTIA's request that the Commission defer the implementation deadline and clarify requirements for participating carriers to support the transmission of embedded URLs and phone numbers in WEA messages.

I. CTIA's Petition Lacks Evidence of Infeasibility and the Potential for Network Congestion

The enhancements to WEA should not be deferred without clear evidence of infeasibility, and if the Commission agrees to a deferral, it should be tied to a specific timeline for the industry to complete standards and testing to ensure feasibility consistent with reasonable industry practices. APCO disagrees with CTIA's proposition that the industry should instead be permitted to undertake these activities in an unspecified timeframe and rejects the suggestion that implementing embedded references might not be achievable at all.³

CTIA raises vague concerns about potential network congestion.⁴ Network congestion and potential "milling behavior" were fully considered by the Commission as part of the rulemaking.⁵ CTIA does not provide evidence that circumstances have changed since the public comment period in these proceedings closed, nor does it provide specific information beyond how embedded references could impact individual websites. The ability of websites to handle increased traffic is not relevant to whether or not wireless carriers require additional time to meet the implementation deadline. Indeed, when embedded URLs are available to alert originators, public safety officials will be able to take website capacities into consideration when choosing URLs to assist the public.

³ CTIA Petition for Reconsideration, Docket No. 15-91, at 2-3 (filed Dec. 1, 2016) ("Petition").

⁴ *Id.* at 3-5.

⁵ R&O at paras. 27, 30-31.

APCO agrees with the Commission's conclusion, based on numerous comments in the record, that embedded URLs in WEA messages would actually reduce network congestion.⁶ CTIA fails to provide new facts to refute this conclusion or explain why network congestion may not actually be worse without embedded references. In a life-threatening emergency, the public will naturally search the web via their mobile devices if they are not directed to a specific URL. This only puts the public at greater risk by delaying action while flooding the wireless networks with unnecessary inquires.

The record clearly supports the Commission's action to require support for embedded references and phone numbers in WEA messages, and CTIA has presented no new facts or circumstances. Accordingly, the Commission should dismiss CTIA's request for deferral of the implementation deadline.

II. The Embedded Reference Requirements Do Not Require Clarification

CTIA seeks clarification of the meaning of the word "clickable," as applied to embedded URLs and phone numbers,⁷ and asks the Commission to clarify that support for embedded references is required only for "new, WEA-capable devices"⁸ because certain legacy devices do not support embedded references or internet connectivity. Clarification is unnecessary, as the intent of the embedded references requirement has been clear throughout the WEA proceeding.

Embedded URLs and phone numbers within the context of WEA should match the user's experience with embedded references in other contexts, meaning that tapping or clicking on a URL automatically opens that URL on the device's default web browser, and that tapping or

⁶ *Id.* at para. 30.

⁷ Petition at 8-9.

⁸ *Id.* at 9.

clicking on a phone number automatically dials that number. APCO understands that this may be technically infeasible for some devices, but CTIA's request goes much further. Limiting support for embedded references to "new, WEA-capable devices" would unreasonably deny the benefits of enhanced WEA messages to a large number of existing devices in circulation that already support the use of embedded references in non-WEA contexts.

CONCLUSION

APCO supports the Commission's actions to require that participating providers support embedded URLs and phone numbers in WEA messages as a helpful step towards modernizing WEA. CTIA's petition does not introduce new information or explain why circumstances have changed, and it should therefore be dismissed.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

Jeffrey S. Cohen
Chief Counsel
(571) 312-4400 ext. 7005
cohenj@apcointl.org

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