



City and County of  
San Francisco

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Anne Kronenberg  
Executive Director

January 5, 2018

**Chairman Ajit Pai**  
**Commissioner Brendan Carr**  
**Commissioner Mignon Clyburn**  
**Commissioner Michael O'Rielly**  
**Commissioner Jessica Rosenworcel**  
445 12th Street SW  
Washington DC 20554

[Submitted via FCC Electronic Comments Filing System]

Re: PS Docket 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting

Dear Mr. Chairman and Commissioners:

The City and County of San Francisco (the City) appreciates the Federal Communications Commission's (Commission) recent actions to improve the Wireless Emergency Alerts (WEA) system including the order to implement embedded references. The City echoes the New York Emergency Management Department Notice of Ex Parte filed December 19, 2017.

The recent Northern and Southern California fires and 2017 Hurricane season demonstrate the need for continued, further improvement on Wireless Emergency Alerts (WEA). The *Order on Reconsideration* (FCC 17-143) released November 1, 2017 reaffirms timeframes for the five (5) largest mobile service providers to support basic geo-targeting and embedded references. In the interest of public safety, the City appeals to the Commission to remain firm on the shortest possible timelines with respect to the five (5) largest mobile service providers and no later than May 2019.

The commercial mobile service industry has put on record that better geo-targeting is not only feasible, but can be accomplished by utilizing the existing network-level capabilities and device based technology. Further, the Industry has expressed support for limiting "overshoot" of messages to 1/10<sup>th</sup> of a mile as proposed by the Communications Security, Reliability and Interoperability Council V (CSRIC V) report.<sup>1</sup>

Additionally, the City wishes to emphasize the following sections and additions for improvement:

- **§ 10.441 Embedded references**

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<sup>1</sup> CSRIC V WEA Geo-Targeting Report at pages 31-32.

The City fully endorses the inclusion of embedded Uniform Resource Locators (URL) by May 2019; however, the City recommends the Commission consider additional multimedia sources such as embedded maps, infographics, and photos. The instantaneous distribution of evacuation maps, boil water notices, and other images can save precious time and lives.

- **§ 10.480 Language support**

The City appreciates the inclusion of Spanish language capabilities by the Commission; however, more than more than 112 different languages are spoken in the San Francisco Bay Area and 45 percent of all San Francisco residents do not speak English at home. By City ordinance, all messages must be translated from English into at least three languages including Chinese, Spanish, and Tagalog. It is important the Commission continues to expand the rules to include additional languages supported by WEA.

- The City also strongly recommends the Commission to review and adopt a rule to include the features of “Many-to-One” notifications. The ability to use crowdsourced feedback during an emergency can help expedite and improve response.

The City appreciates the continued efforts of the Commission to improve WEA and support of public safety Nationwide; however, the City implores the Commission to take appropriate measures and set a firm deadline of May 2019 for all proposed WEA improvements. In over one (1) year, our communities are at risk for more fires, hurricanes, earthquakes, and other man-made threats making each moment precious.

As always, the City is willing to continue work with the Commission and the commercial mobile service industry on this critical issue.

Thank you for your time and consideration.

Sincerely,



Anne Kronenberg  
Executive Director, San Francisco Department of Emergency Management  
City and County of San Francisco