



Fire Department

Michael D. Moore
Fire Chief

City of Arts & Innovation

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

Mr. Chairman and Commissioners:

With the start of the new year, the public safety community continues to have a need for a robust and effective Wireless Emergency Alerts (WEA) system. It is time to utilize the technology that is already available. The 1/10th of a mile granular geo-targeting capabilities have been a request and in discussion since March 2015 at the time of CSRIC IV. Mobile phone devices can already do this –from getting a car ride to finding the nearest restaurant – geo-targeting is part of our everyday lives. The ability to geo-target an emergency message is key to effectively alerting our public, and the public safety community should be able to take advantage of these existing capabilities.

Geo-targeting and the 1/10th of a mile granular capability can be an effective asset in the case of wildfires, hazardous materials incidents, flooding, and incidents at special events. Having confidence in the granular nature of a WEA message is key, and the 1/10th of a mile rule will give emergency management and public safety that confidence. Riverside has experienced many wildfires where this tool would have improved our alerting capabilities to the benefit of our residents. Many of these wildfires occur along the Santa Ana Riverbed which is also a jurisdictional dividing line. Having the ability to alert the right people at the right time is key to providing actionable information. The 1/10th of a mile would allow us to alert and inform only those people that need to be alerted while not over alerting into other jurisdictions or to homes and populations not needing to act.

The software and technology are already here. The May 2019 timeline is doable with the current software update schedules. WEA devices already have the capability to provide device based alert discrimination, including having capability to receive cell broadcast messages, know the device's location, it's functionality to display maps, and current processing power to incorporate all three of these and more. The wireless and device providers can utilize existing software update schedules to incorporate these features, therefore allowing the device to use its location to decide whether or not to play the alert. We agree with Chairman Pai's statement while Commissioner in September 2016 that "...we be more forward-leaning, that we commit in this Order to moving ahead with a device-based approach to geo-targeting. By enabling devices to screen emergency messages and only allow the relevant ones through, this approach would allow public safety officials to target information to specific geographic areas."

The May 2019 deadline is a must. The time to act is now. It is understandable that software may need changes but we have been talking about this for three plus years. There is more than enough time to

Office of Emergency Management

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implement any changes needed to implement this solution. Delaying this further will put communities at risk of further loss of life associated with lack of ability to alert those who need to act on the alert information.

The Riverside Office of Emergency Management respectfully requests that this deadline be implemented.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark D. Annas", followed by a long horizontal line.

Mark D. Annas
Emergency Services Administrator
City of Riverside Office of Emergency Management