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Federal Communications Commission
455 12 Street, SW
Washington, DC 20554

Mr. Chairman and Commissioners,

We are writing to you to help make you aware of a serious problem with the Federal Wireless Emergency Alert (WEA)/Emergency Alert System (EAS). This system is part of the federal Integrated Public Alert & Warning System (IPAWS) and needs to be fixed. Our county faces the potential for significant damage, deadly flooding and debris flows after the catastrophic Thomas Fire which scoured our mountains of vegetation. We will need to be successful at alerting the public of these and other hazards. Presently, we cannot do this due to the flaws in the WEA/EAS system.

WEA is a public safety system that allows customers who own certain wireless phones and other enabled mobile devices to receive geographically-targeted, text-like messages alerting them of imminent threats to safety in their area. EAS is a national public warning system used by state and local authorities to deliver emergency information targeted to specific areas via television and radio broadcasters. Both of these alerting tools are intended to allow authorities to deliver timely, accurate and targeted information to the public before, during, and after emergencies so that people can take steps to keep themselves safe. At present, the WEA/EAS system is seriously deficient in its ability to do this. This is a nationwide problem, one that could have deadly-serious consequences if deliberate action to fix the system is not taken.

Currently, WEA is limited to no more than 90 characters which forces the alerting agency to have to pare down and/or abbreviate an emergency message, often resulting in an unclear alert that causes confusion among the public. It also sends the message far beyond the area targeted (in many cases, sending the alert to the entire county as well as populations of neighboring counties), which creates fear and confusion for people in the unaffected areas. This has resulted in a large volume of panicked people calling 9-1-1, thereby inundating emergency dispatch centers and public safety agencies with calls and clogging up the 9-1-1 system for hours.

To make matters worse, the EAS portion of the system has little to no state and federal oversight and relies on the voluntary cooperation of radio and television broadcasters who are often working with antiquated and/or incompatible equipment. This complicates the message flow and adds multiple points of weakness into the system. What's more, there are limitations on the length, format, and type of message that can be broadcast. Like WEA, the EAS has had numerous failures in real-world events nationwide and we are not confident that even a Presidential message using EAS would be successful.

In summation, WEA/EAS need to be updated, simplified, and overhauled to better address functional requirements for emergency communication and public mass notification from local governments. The issues with this system must be fixed or people's lives will continue to be in danger. Numerous solutions to the aforementioned problems exist, including but not limited to an expanded character limit and refined geo-targeting for WEA, and state and federal oversight and system upgrades for EAS. These and other solutions have been discussed for years and we hope timely action can be taken to eliminate the issues plaguing this system.

Thank you for your time and consideration.

Robert Lewin, Director
Santa Barbara County Office of Emergency Management