



January 5, 2018

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Ex Parte Presentation, *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91.**

Dear Ms. Dortch,

On January 3 – 5, 2018, CTIA along with its member companies listed in Attachment A (CTIA) met separately with representatives listed in Attachment A from the offices of Chairman Ajit Pai, Commissioner Mignon Clyburn, Commissioner Michael O’Rielly, Commissioner Brendan Carr and Commissioner Jessica Rosenworcel concerning the Commission’s *Further Notice of Proposed Rulemaking* in the above referenced proceeding.<sup>1</sup> During the meeting, CTIA reviewed the attached presentation and CTIA’s proposed framework to effectively enhance the geo-targeting capabilities of alert originators within the existing architecture and framework for the Wireless Emergency Alert (WEA) system that relies upon cell-broadcast technology.<sup>2</sup>

CTIA explained how mobile wireless technologies and the mission of public safety have evolved since WEA was designed and initially deployed in 2012. To reflect this evolution, CTIA discussed ways to enhance the geo-targeting capabilities of WEA in response to the FCC’s *Further Notice of Proposed Rulemaking*, as well as recent emergency situations. Specifically, CTIA discussed how mobile wireless device-based location technologies, in combination with existing network-based cell-sector solutions,

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<sup>1</sup> *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).

<sup>2</sup> CTIA Ex Parte Letter, PS Docket No. 15-91 (Dec. 21, 2017).



can help local alert originators and public safety officials target WEA messages to geographic areas in order to minimize over-alerting.

Importantly, CTIA and its member companies noted that device-based WEA geo-targeting will require fundamental changes to the existing WEA system and components. For example, CTIA and its member companies noted that a mobile device configured to present a cell broadcast WEA message to the consumer does simply that – presents it – without any need to process or analyze the alert content, or change how the device functions as a result of that content. Device-based geo-targeting, in contrast, fundamentally changes how the device processes the information broadcast in the WEA message. As shown in the attached presentation, unlike WEA enhancements that affect the higher (e.g., application) layers of the device, like embedded references, device-based geo-targeting will affect multiple layers of the device, including the lower, physical layers of the device. Such a fundamental shift in WEA capabilities will require new mobile wireless network and device standards and solutions, as well as new or modified technologies and practices for FEMA’s IPAWS and alert originators.<sup>3</sup>

CTIA and its member companies highlighted that the WEA system is a success in large part because the Commission has balanced time for standards-based technology to be developed, implemented, and tested, with the urgency of the public safety mission. For device-based geo-targeting to succeed, the Commission must again determine a reasonable timeline that not only recognizes the important role of WEA to the safety and security of Americans, but accounts for technical feasibility, the rulemaking record, relevant precedent, and the geo-targeting capabilities already available to Alert Originators.

Given the significant efforts that will be necessary to support this new capability, CTIA and its member companies stated that 36 months is the most aggressive, yet achievable, timeline the Commission should adopt. In the meantime, existing WEA geo-

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<sup>3</sup> See Communications Security, Reliability and Interoperability Council V, Working Group 2, Final & Recommendations, *Wireless Emergency Alerts – Recommendations to Improve Geo-Targeting and Offer Many-to-One Capabilities*, at 15-16, (Sept. 2016); ATIS, *Feasibility Study for WEA Cell Broadcast Geo-Targeting*, ATIS-0700027, at 50-51 (2015).



targeting capabilities will continue to provide a meaningful level of geo-targeting in many emergency situations.

A principal reason that CTIA believes 36 months is necessary is due in large part to the Commission's 2016 Order that imposed two upcoming deadlines for WEA enhancements by November 2018 and May 2019 that require iterative updates to mobile network and device standards and solutions, as well as FEMA's IPAWS and alert originator technologies. To address this challenge and make achievable the device-based WEA geo-targeting deadlines, as proposed below, the Commission should align the upcoming WEA enhancement deadlines.

Even with the challenges and variables CTIA described in the meetings, as an interim step, CTIA believes it may be achievable to begin the testing of new WEA enhancements with a prototype device using device-based geo-targeting methods by December 31, 2019. Participating CMS providers could also begin offering new devices with device-based WEA geo-targeting capabilities no later than 24 months after completion of necessary technical standards, as the Commission has proposed. Of course, as CTIA has noted, further evaluation is necessary to determine whether existing or legacy devices can be modified through software to support WEA geo-targeting capabilities, which ATIS has indicated could be completed by June 30, 2018.

Overall, CTIA and its member companies encouraged the Commission to adopt a reasonable framework and achievable timeline that can enhance the geo-targeting capabilities of the WEA system, and maintain the important role of WEA to the safety and security of America's wireless consumers.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Assistant Vice President – Regulatory Affairs  
CTIA®



cc: Nick Degani  
Zenji Nakazawa  
Louis Peraertz  
Erin McGrath  
Nirali Patel  
Travis Litman  
Umair Javed



## Attachment A

### **CTIA**

Scott Bergmann\*  
Matthew Gerst  
Tom Dombrowsky (DLA Piper)

### **CTIA Member Companies**

Joe Marx (AT&T)\*\*  
Mike Tan (AT&T)\*\*\*  
John Kuzin (Qualcomm)  
Rob Kubik (Samsung)\*\*\*\*  
Ray Rothermel (Sprint)  
Eric Hagerson (T-Mobile)  
Shellie Blakeney (T-Mobile)  
Robert Morse (Verizon)

### **Office of Chairman Ajit Pai (Jan. 3, 2018)**

Nick Degani  
Zenji Nakazawa

### **Office of Commissioner Mignon Clyburn (Jan. 3, 2018)**

Louis Peraertz

### **Office of Commissioner Michael O’Rielly (Jan. 4, 2018)**

Erin McGrath

### **Office of Commissioner Brendan Carr (Jan. 5, 2018)**

Nirali Patel

### **Office of Commissioner Jessica Rosenworcel (Jan. 5, 2018)**

Travis Litman  
Umair Javed

\*Attended only the meeting with Chairman Pai’s Office

\*\* Attended only the meetings with the Offices of Chairman Pai, Commissioner Clyburn, and Commissioner O’Rielly

\*\*\* Attended only the meetings with the Offices of Commissioner Carr and Commissioner Rosenworcel

\*\*\*\* Attended only the meetings with Offices of Commissioner O’Rielly and Commissioner Carr