



2025 Shield Drive
Steamboat Springs CO 80487
(970) 879-1110



October 9, 2018

Michael J Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: FCC Rule Waiver Request for Live
Routt County Emergency Operations Wireless Emergency Alert/Emergency Alert System
Test

Dear Chief Wilhelm:

This letter is to respectfully request a limited waiver of the Commission's Wireless Emergency Alert (WEA) and Emergency Alert Service (EAS) rules to permit Participating Commercial Mobile Service (CMS) Providers to participate in a WEA/EAS test conducted by the Routt County Emergency Operations / Emergency Communications Center (RCEO/ECC). Routt County Communications Center is the sole Public Safety Answering Point for Routt County and is the sole Originating Authority for IPAWS messages in the County as well.

As proposed, and if approved, the test would be conducted during a county-wide hazardous materials functional exercise on Thursday, October 24, 2018 at approximately 8:30 AM Mountain Time, and would be targeted to Routt County. The WEA message will read as follows: **"This is a Routt County test. No action required. Provide feedback to Routt County Website."** The EAS message will read: **"This is a test of the Routt County Alerts System. If there had been an actual emergency, further instruction would have followed. This is only a test. No further action is required. Provide feedback to Routt County Website"**. We intend to utilize "LAE – Local Area Emergency" as the IPAWS event code for this test / live message.

The purpose of conducting the test at this time is to ensure that emergency officials in Routt County have a clear understanding of how alerts would perform in our mountainous area. Routt County emergency response stakeholders, including Law Enforcement and Fire/EMS have been involved in the planning of this Hazardous Materials exercise, which this WEA/EAS message will be a component of.

Routt County hosts a large number of tourists year-round. Through IPAWS, WEA/EAS is an excellent tool to reach visitors in Routt County, who most likely would not have subscribed to our county's emergency alert system. (The City of Steamboat Springs, which is the Routt County seat, hosts about 20 special events in the summer months alone).



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Colorado has faced drought conditions this summer and the fire outlook has called for higher-than-average chance for large wildfires in our area. In addition, Routt County has experienced two recent wildland fires that required evacuation preparation and actual evacuation of several residences. These conditions spurred many of the citizens to register with Routt County Alerts. There has been concern and skepticism of the effectiveness of these tools on behalf of some of our citizens. Additionally, we want our citizens to be familiar with the format of the WEA/EAS messaging and to become familiar with our County webpage. In the event of emergencies, our WEA/EAS and other emergency messaging will direct citizens to: <https://co-routtcounty2.civicplus.com/311/Critical-Emergency-Information> for more information.

In advance of this test, we will have conducted considerable public outreach via the Routt County website: <https://co-routtcounty2.civicplus.com> and social media sites. We also intend to engage our local newspaper, the Steamboat Pilot and Today, and conduct other news media interviews with local outlets. We will also inform our neighboring PSAP's of the test. We have coordinated this request with the Colorado Broadcasters Association through Mr. Matt Pearce.

We have developed a short survey for citizens to participate in following the test, in order to capture data about location, reach, cell carrier, handset operating system, and awareness in general about the test. We are happy to share the results of this survey with FEMA and the FCC, if desired.

We appreciate the opportunity to collaborate with the FCC and FEMA on this opportunity to test the WEA/EAS functionality in a mountainous environment. Thank you for your consideration! If you have further questions or concerns, please feel free to contact me at jnettlles@co.routt.co.us or by cell at 970-875-4972.

Sincerely,

A handwritten signature in blue ink that reads 'Jason C. Nettles'.

Jason Nettles
Emergency Communications Manager