



January 8, 2018

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE PS Docket 15-91 Improving Wireless Emergency Alerts

Dear Secretary Dortch:

On January 3, 2018, emergency management officials communicated to the Federal Communications Commission (FCC) the technical feasibility of updates to the geo-targeting capabilities of the Wireless Emergency Alert (WEA) system upgrades. Despite the open dialogue, HCOHSEM once again expressed the urgency to act now on geo-targeting upgrades to the WEA system. Public safety believes that a May 2019 implementation deadline is not only feasible, but also a necessity, as more disasters will inevitably occur during this time.

Both public safety and carrier representatives have been discussing a device-enhanced upgrade for several years. While the industry has known device-based WEA was coming for years, there have been ongoing discussions on how to achieve it. CISRIC IV (2013-2014) and CSRIC V (2015-2016) discussed and then recommended device-based, respectively. Much of the language in CSRIC V is on how to achieve this through software upgrades, which is a light lift from the wireless industry.

HCOHSEM cited several examples regarding the feasibility of a May 2019 implementation for the geo-targeting upgrades. The technical responses in the record that suggest that this will be an insignificant lift on the part of the wireless industry. RX Networks, who provides services to over a billion mobile devices, discussed how incorporating the location capabilities of the handset into WEA "can and should be done in a way that does not burden the carriers' networks."

Comtech in 2016 laid out how network and handset-based WEA would work. "A small team of 3-4 engineers working on a proof of concept for this solution determined that these changes can be done using existing WEA systems, standards, and devices and can provide a demonstration within 90 days...However, there are questions on the timeline to implementation assuming the need for a new standards. As the changes to WEA to enable device based are software changes at



COUNTY JUDGE ED EMMETT
DIRECTOR

the CBC and handset and a significant portion of this software is already written, we plan to demonstrate a device based WEA using existing technology and standards in 90 days.”

AT&T stated in comments 13 months ago that it “is well aware of capabilities in mobile devices and device operating systems, as well as the APIs available to application developers,” and that a “managed WEA App could then take those messages and, if the user has enabled location services, determine the handset’s location using existing capabilities and APIs available in the mobile device OS. Once the managed WEA App has identified the handset’s location, it can determine whether the handset is in the alert area and display the message; if the handset is not in the area, it can ignore the message. If the location data are not available in the handset, the managed WEA App could default to displaying the message, which it has already received.”

HCOHSEM reiterated that there are multiple paths to get this enhanced geo-targeting rolled out. It can be done, as items on the record suggest, by May 2019 or through a more cumbersome and lengthy path that will delay life-saving improvements well into 2121. We believe the ultimate path taken will be determined by the timeline the FCC sets. We believe that either the May 2019 or 2121 paths are doable, the true cost is in how many lives will be put at risk based on the timeline to be set by the FCC.

A copy of this letter will be filed with the FCC, via ECFS.

Sincerely,

A handwritten signature in black ink, appearing to read "FS" followed by a stylized flourish.

Francisco Sanchez
Deputy Emergency Management Coordinator
Harris County Office of Homeland Security & Emergency Management