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January 12, 2018

Marlene Dortch
Secretary

Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: PS Docket No. 15-91

Dear Ms. Dortch:

I am writing to express APCO's support for the draft Second Report and Order regarding the FCC's Wireless Emergency Alerts (WEA) proceeding.¹ The proposed enhancements to geo-targeting and alert message preservation will make our communities safer and improve public safety operations around the country. Based on the record that has developed in this proceeding, requiring the proposed enhancements by November 30, 2019, is reasonable and technically feasible.

Requiring participating wireless providers to deliver WEA messages to an area that matches the target area specified by an alert originator, with no more than 0.1 of a mile overshoot, will be a dramatic enhancement to WEA. Public safety communications professionals will have increased confidence in WEA and will be able to deliver emergency information more effectively. Alert recipients will be more likely to pay attention to the messages and less prone to opt out of receiving them. Simply put, improving geo-targeting for WEA will save lives.²

APCO further agrees that the record demonstrates that it is technically feasible for participating providers to transmit polygon coordinates to mobile devices without affecting the 360-character allotment. The expansion to 360 characters is a welcome enhancement and should be preserved for its intended purpose, to afford alert originators added flexibility in crafting messages.

¹ In the Matter of Wireless Emergency Alerts, Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91, 15-94, Draft Second Report and Order and Second Order on Reconsideration, FCC-CIRC1801-01 (rel. Jan. 9, 2017).

² In this regard, APCO appreciates the initial focus on improving geo-targeting, and welcomes additional action in the near term on the remaining issues raised in this proceeding.

In addition to expressing support for requiring geo-targeting enhancements by 2019, APCO recommends the incorporation of rule language to add clarity to the obligations of participating WEA service providers. For example, the language of Final Rule Section 10.450 could specify that, “No later than November 30, 2019,” participating CMS providers must match the target area. Section 10.450 could also reflect the language of the draft Order specifying that this deadline is to apply to “new mobile devices offered for sale after the rule’s effective date and to existing devices capable of being upgraded.”

The rules could also clarify the narrow intent of what it means to be “technically incapable of matching the specified target area.” Based on the record, it is technically feasible to achieve the geo-targeting goal by November 30, 2019, through software upgrades to many existing devices and with the introduction of new devices. Thus, the rules should be clear that “technically incapable” should not apply where providers have failed to develop standards, implement network and device changes, or pursue other technological solutions.³ After November 2019, CMS providers may only fall back to the “best approximates” standard in a narrow set of circumstances. While APCO expects participating CMS providers to continue serving as good partners in this trusted and official public safety alerting system, the FCC’s rules should minimize the potential for any confusion with respect to the carriers’ obligations to achieve geo-targeting improvements.

APCO appreciates the efforts of Chairman Pai, Commission staff, and public safety stakeholders to set a path for emergency alerting that leverages available technology to better protect the public. APCO encourages the Commission to adopt the draft Order consistent with the views expressed herein.

Respectfully submitted,

/s/
Jeffrey S. Cohen
Chief Counsel

³ As the draft Order points out, participating carriers are not bound to using any particular technology for achieving enhancements to WEA.