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Via ECFS

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

Re: Notice of *Ex Parte* Communication
Wireless Emergency Alerts, PS Docket No. 15-91

Dear Ms. Dortch:

Microsoft appreciates the Commission's work seeking to improve the consumer experience with wireless emergency alerts and we welcome the opportunity to comment on this very important issue. Microsoft offers the following additional information pertaining to technical changes being considered for the wireless emergency alert program.

Microsoft has not performed device testing but expects that the addition of an additional data page to a wireless emergency alert to accommodate polygon geocoordinates should impose a minimal impact on device performance and message delivery latency. The potential for increased alert delivery latency or device performance degradation (specifically, battery drain) would be more likely to occur with a significantly greater number of polygon coordinates, due to the increased magnitude of calculations that the operating system would be required to perform.

The decompression of geocoordinates is a function performed by the device's modem, not its operating system. It is our understanding that the effect of the modem's decompression activity on device performance may differ by modem and the decompression protocol used, and also may differ on a device-specific basis.

Microsoft supports the proposal in the draft Second Report and Order to lift the geo-targeting restriction for delivery to devices with disabled location services. Delivering the alert without such a restriction will appropriately default in favor of delivery rather than non-delivery of critical

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alerts. Furthermore, to otherwise require the device to activate a disabled location capability would adversely affect consumer privacy, device power, and alert message delivery time.

Finally, Microsoft recognizes the interest in accelerating improvements to the wireless emergency alert system. Rushing the development of a feature, however, has the potential to result in unforeseen technical deficiencies. Because of the mission-critical nature of the program and the importance of the sound development of new technical requirements, Microsoft urges caution in establishing the timeframe for implementing new requirements that are technical in nature. To allow for meaningful software development, testing, and device updates, the Commission should afford WEA participants no less than 24 months from the effective date of a new rule or, if later, from the date of the finalization of a new industry technical standard, to implement new emergency alert technical requirements.

Respectfully submitted,

/s/ Paula Boyd

Paula Boyd

Senior Director, Government and Regulatory Affairs

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