



**THE POLICE COMMISSIONER**  
**CITY OF NEW YORK**

January 3, 2018

Chairman Ajit Pai  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Chairman Pai:

Encouraged by the steps already taken to improve the Wireless Emergency Alerts system rules adopted in the Federal Communications Commission (FCC) September 2016 Report and Order. Now, the NYPD joins our colleagues at the New York City Department of Emergency Management in urging the FCC to adopt rules that better allow us to respond to the full range of 21<sup>st</sup> century emergencies.

To put this request into perspective, on the morning of September 19, 2016, the NYPD requested that the Office of Emergency Management send a Wireless Emergency Alert to every phone in all five boroughs, the second time that system was used in this way during a counterterrorism operation. The message read: *"WANTED: Ahmad Khan Rahimi, 28-yr-old male. See media for pic. Call 9-1-1 if seen."* Due to outmoded restrictions to the Wireless Emergency Alert system, we asked them to help us find him, but couldn't put an image with that request. Instead, we had to depend on the proactive initiative of those receiving the message and hope they would take the additional steps to search the internet on their own.

We cannot continue to rely on the public taking this extra step, and when it comes to our city's most critical cases, the law enforcement community can no longer afford to depend on an emergency wireless response system that is lagging far behind what technology can offer. In this age of instant access to visual information via social media applications, we need to enhance our country's ability to rapidly, efficiently, and securely deliver comprehensive emergency information, including images, to the public. Pictures provide instant recognition and speak a universal language. Most importantly, they enable rapid response from every potential witness who could save countless lives through fast action. Again, the Chelsea bombings highlighted this major weakness in the Wireless Emergency Alert system: millions of New Yorkers who wanted to help us find the suspect were given no other option but to take the additional time to search for his photo. In any case like this, that time is often a commodity we can't afford to waste.

It is essential that we build on the progress already made by your office to improve the Wireless Emergency Alert system to its highest capacity, including the increase in character count from 90 to 360, the inclusion of URLs and telephone numbers in WEA messages, and the

adoption of Spanish language messaging. As mentioned in my September 26 letter, the FCC should quickly enhance our emergency alert system to maximize public safety and crime prevention by:

- 1) **Allowing multimedia content, including thumbnail size images and instructional infographics, in WEA messages on 4G LTE and future networks.**
- 2) **Improving geo-targeting, which will enable the WEA architecture to direct alerts to geographic target areas designated by the alert originator.**
- 3) **Integrating many-to-one capability to provide an anonymized form of feedback in high impact zones, allowing emergency managers and public safety officials to better evaluate the impact on an emergency from more efficient deployment of scarce resources.**
- 4) **Supporting messages in multiple languages.** NYCEM has pre-translated (in a generalized form) more than 100 of its most commonly issued messages in the 13 most commonly spoken languages in New York City. Notify NYC presently includes a link at the end of e-mail messages that states: "To view this message in American Sign Language (ASL), Arabic, Bengali, Chinese, French, Haitian Creole, Italian, Korean, Polish, Russian, Spanish, Urdu, or Yiddish, please visit: <http://on.nyc.gov/1kdbhe2>."

In the face of emerging threats, New York City needs to remain on technology's cutting edge by using public information systems to their fullest capacity to advance its emergency services and capabilities. This vital step will not only lead to improved public safety, but also maximize our prevention efforts against terrorism and other criminal acts.

I am pleased to provide these comments on the proposed rule and look forward to working with the Commission on initiatives that could strengthen this vital resource.

Sincerely,



James P. O'Neill  
Police Commissioner