



January 17, 2018

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Wireless Emergency Alerts (WEA) system

Mr. Chairman and Commissioners:

We are writing to express our concern that the Wireless Emergency Alerts (WEA) system is urgently in need of life-saving technology updates. Specifically, a device-assisted geo-targeting capability timeline and requirements have still not been adopted by the FCC and wireless industry.

Several agencies in our region have or will soon have the ability to launch WEA through the Integrated Public Alert and Warning System (IPAWS), including the City of Portland Bureau of Emergency Management, Clackamas County Department of Disaster Management, Clark Regional Emergency Services Agency, Multnomah County Office of Emergency Management, and Washington County Consolidated Communications Agency.

Our region faces a range of natural, human-caused, and technological hazards and where the public may need to be informed quickly to take action to stay safe, including 9-1-1 outages, flooding, winter weather, the release of hazardous materials, wildfires, civil disturbances, boil water notices, dam failures, public health emergencies, earthquakes, and volcanic eruptions. For example, the Eagle Creek Fire last September in the Columbia River Gorge reached the edge of the metro region and for a time was the top fire priority in the country. WEA could have helped local emergency managers communicate with residents in evacuated areas and non-residents visiting or traveling through the area. Unfortunately, limitations with the current version of WEA reduce its utility when sending alerts to narrowly-defined areas.

The WEA service today already includes device-specific discrimination – based on personal programming on the device – to allow users to turn “off” and “on” the Amber and Imminent Threat alerts they are sent. WEA enabled devices already have the technology they need to add device based discrimination: the capability to receive cell broadcast messages, the ability to know the device’s location, the functionality to display maps, and the processing power to incorporate all three of these and more. The wireless industry can update the software in the devices to incorporate existing features and functionality that will allow the device to use its location to decide if the device should play or not play the message, just like it checks the personal settings to make sure the device has enabled an Amber or Imminent Threat alert.

On January 9th, the FCC took the first step toward making the nation's WEA system achieve these readily available technological upgrades. The proposal by Chairman Ajit Pai to deliver life-saving alerts in a more geographically-targeted manner is both bold and necessary. The FCC proposal rightly suggests that "geo-fencing allows mobile devices to compare their current location to the target area specified by the alert originator and display the Alert Message only if it is located within the target area." Public safety officials strongly agree that using the intelligence and location of the device is the easiest and quickest path forward.

We strongly feel that the major carriers should not be exempt from exercising the newly proposed rule of delivering "an alert message to 100 percent of a target area with no more than 0.1 of a mile overshoot." While the major carriers may have a small portion of their network that is technically incapable of matching within 0.1 of a mile, we are confident that they can deliver the message into all remaining areas that are technically capable in compliance with new standards.

While the text of the Chairman's proposal provides significant details about Commission action, the actual proposed rule changes make up a little over one page of the 49-page document. The proposed rules do not mention or define how the intelligence in the handset will be incorporated into WEA, and how wireless providers must enact the proposed WEA changes to all new handset devices being released in the future, in addition to updating existing device software. The rules fail to require carriers to pass the alert area coordinates to the mobile device. The rules also suggest that if carriers aren't technically capable of matching an alert polygon, they simply have to give their best efforts. This would provide no improvement to WEA.

And, the rules identify no timeline for implementation, in spite of the discussion in the text of the Order. The public safety community has cited multiple reasons why an expedient and clearly defined implementation timeline for the WEA geo-targeting enhancements is necessary, yet the rules offer no timeline. Due to our need for timely improvement to WEA, we must side with public safety and emergency management communities who have presented an achievable timeline of May 2019 for implementation.

We urge the FCC to act swiftly to meet the need for enhanced WEA geo-targeting capabilities no later than May 2019, the same timeframe set for the previously approved WEA upgrades to rollout.

Sincerely,



Courtney Patterson
Interim Director
Portland Bureau of
Emergency Management



Chris Voss
Director
Multnomah County
Office of Emergency
Management



Nancy Bush
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