

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Homeland Security and Emergency Management Agency**

Muriel Bowser  
Mayor



Chris Rodriguez  
Director

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

Mr. Chairman and Commissioners,

As 2018 begins, the District of Columbia Homeland Security and Emergency Management Agency lacks the technology updates to the Wireless Emergency Alerts (WEA) system that would allow for more targeted and detailed messaging. I am writing to express our concern that device-assisted, geo-targeting capability requirements have still not been adopted by the FCC and wireless industry. Now is the time to act on WEA geo-targeting improvements that are precise within one-tenth of a mile.

On January 15, 2017, HSEMA conducted the nation's first live test of WEA on a targeted area to ensure that we could send direct emergency messages during the 57<sup>th</sup> Presidential Inauguration. We tested the system around the National Mall to provide an approximation of the area where inaugural crowds would gather. During the test, we dispatched operations teams to locations throughout the target area. These teams reported positive results. Overall the test was a success, demonstrating one of our most powerful information sharing tools. However, the test did demonstrate the considerable bleed-over in geo-targeting. While the test was centered on the National Mall, cell phone users at our office, roughly three miles away, and in other neighboring jurisdictions also received the test alert.

The WEA service today already includes device-specific discrimination to allow users to turn "off" and "on" Amber and Imminent Threat alerts. 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 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.

On January 9<sup>th</sup>, the FCC took the first step toward making the nation's WEA system achieve these readily available technological upgrades. The proposal by Chairman 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.



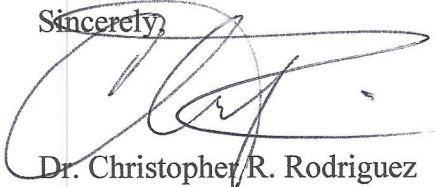
We strongly feel that the major carriers should not be exempt from exercising the newly proposed rule of delivering “an alert message to 100 percent of a target area with no more than 0.1 of a mile overshoot.” While the major carriers may have a small portion of their network that is technically incapable of matching within 0.1 of a mile, we are confident they can deliver the message into all remaining areas that are 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 are not technically capable of matching an alert polygon, they simply have to give their best efforts. This would provide no improvement to WEA. Additionally, the rules themselves identify no timeline for implementation, in spite of the discussion in the text of the proposal. 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.

The District of Columbia Homeland Security and Emergency Management Agency urges 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. Failure to do so leaves the District of Columbia susceptible to more potential disasters, without the ability to properly target alerts to our citizens. Failure to roll out these improvements by May 2019 is irresponsible to the citizens that we are charged to serve and protect. It will erode the trust of wireless alert originators to send a timely, precise message when life or death may be on the line.

We respectfully request that the FCC take immediate action to ensure that industry meet these standards before more lives are put at risk.

Sincerely,

A handwritten signature in black ink, appearing to read "Dr. Rodriguez", is written over the word "Sincerely,".

Dr. Christopher R. Rodriguez  
Director