



January 28, 2019

Michael J. Wilhelm  
Chief, Policy and Licensing Division  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: AMENDED- Montgomery County, TX Wireless Emergency Alert Test – PS Docket No. 15-91 ID No. 11291088205770

Dear Chief Wilhelm:

The Montgomery County Office of Homeland Security and Emergency Management (MCOHSEM) hereby amends its letter dated November 29, 2018, by changing the dates of the tests we will ensure that we have ample time to inform the public of our testing. We have contacted the Commercial Wireless Service Providers and have informed them of the testing schedule. They are all in agreement with our testing schedule and will monitor on their end upon test day.

As the primary initiator of public alerts in Montgomery County, the Office of Homeland Security and Emergency Management would like to request approval of an FCC Rule Waiver in order to conduct live testing of the Wireless Emergency Alert (WEA) system for Montgomery County, Texas.

The live tests, pending your approval, will be sent by MCOHSEM on March 19, 2019 and are scheduled to occur at 10:15 am, 11:15am and 11:30 am Central Standard Time. If necessary, a back-up date of March 26, 2019 at 10:15 am, 11:15 am and 11:30 am Central Standard time will be used.

The tests will involve the use of a Wireless Emergency Alert (WEA) text message using the Integrated Public Alert and Warning System (IPAWS). We feel that the best way to test our county's alerting system is to have 3 tests. The first test will be countywide and then subsequent testing will be two pre-determined geo-located areas. Maps are attached. The purpose of sending 3 tests is that there is a vital need to test Montgomery County as a whole, but we also want to make sure that we test our ability to geo-locate an area. We determined the areas as a more rural area and a more densely populated area, as this would be a common way we would send out WEA messages. Montgomery County has a very diverse population where part of our county is densely populated and live in close proximity to one another and the other being spread out. From a public service stand point we want to ensure that we can reach both populations in the event of a disaster, such as wildfires, hurricanes, man-made disasters, etc.

During Hurricane Harvey we noted a potential loss of messages, where some of our constituents informed us that they may not have received our alerts. In the best interest of public safety we want to conduct the test at this time is to ensure that emergency management officials are able to test and validate its IPAWS origination capabilities and the participant's abilities to disseminate emergency messages to the public. Montgomery County believes that it is imperative to test the system now rather than wait until May 2019 when the FCC's WEA end-to-end testing rules become effective.



We understand and are sensitive to the public's alert fatigue and will make sure to inform them that this testing will not become the norm, but is necessary to ensure their safety. We will also understand the need to notify them of the possibility of receiving several test messages in a short amount of time.

The test message will read **"MCTXALERTS: TEST -This is a test of the Montgomery County Wireless Emergency Alerts. No action is required."**

The message will only broadcast to cell phones and e-mails will be sent to the County officials identified by this agency for the test. This test is not intended to be a substitute for the Required Weekly or Monthly EAS test. This will be the first live test of the WEA system for Montgomery County, TX.

If the FCC approves this request, Montgomery County will begin working on multi-media public announcements including press releases, social media postings and informing our local radio station and print media of the upcoming Wireless Emergency Alert (WEA) test. Montgomery County will reach out to and inform public information officers of the affected and surrounding jurisdictions including, emergency response agencies, Public Safety Answering Points (PSAPS), Commercial Mobile Service Providers (CMS), local school districts, and colleges of the testing.

Montgomery County is 40 miles north of the City of Houston and borders Harris County, with a population over 550,000 and encompasses 1041.74 square miles. With our proximity to this vast metropolis and our ever growing population the MCOHSEM and County officials deem this testing necessary as we continue to prepare for any catastrophic incident that happen within our county including, but not limited to hurricanes, wildfires, or manmade catastrophe.

If you have any questions or need further information, please contact Darren Hess, Director of the Office of Homeland Security and Emergency Management at **Darren.Hess@mctx.org** or 936-524-7912 or Cynthia Jamieson, Homeland Security Planner & PIO at **Cynthia.Jamieson@mctx.org** or 936-203-3934.

Sincerely,

Darren Hess

Director of Homeland Security and Emergency Management