



CITY OF DALLAS

October 18th, 2019

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

Re: City of Dallas Wireless Emergency Alert Test-PS Docket No. 15-91

Dear Chief Wilhelm:

The City of Dallas would like to request an FCC Rule Waiver on behalf of Participating Commercial Mobile Services (CMS) Providers to conduct a live Wireless Emergency Alert (WEA) City of Dallas test.¹ The City would like to use the VESTA Alert Notification System on November 2nd, at approximately 12:00 PM CDT. This test would be in conjunction with a full-scale exercise at Dallas Love Field Airport, in which an aircraft crash will be simulated.

If approved, the live test will occur five to ten minutes before the beginning of the exercise and will involve the use of the Integrated Public Alert and Warning System (IPAWS) WEA dissemination method. The target polygon covers the property of Dallas Love Field Airport and the area of State Highway Loop 12 that runs adjacent to the North end of the tarmac.

The test message will read: *"Training exercise at Love Field today. Test only. No need for alarm. Info: bit.ly/2Mlx1yx"*

The test is not intended to be a substitute for any other scheduled tests of Wireless Emergency Alerts. This will be the second live test of WEA conducted by the City of Dallas and builds upon the test conducted March 4, 2019. The City of Dallas has conducted several tests in the IPAWS Lab and plans to conduct an additional IPAWS Lab test before November 2nd.

As emergency managers, we are tasked with public information and warning, which includes alerts and notifications to our residents as well as local, state, and federal officials during emergencies that impact life, safety, and property. The City of Dallas faces a wide variety of hazards that threaten our residents and guests. While many of these hazards are natural, we must also prepare for man-made/technical disasters (e.g. an actual plane emergency at Dallas Love Field).

The Federal Aviation Administration (FAA) mandates that Dallas Love Field conduct a full-scale every three years. This year the exercise will involve a simulation of a plane crash on the tarmac, and several hundred first responders will be deployed as if a real event was occurring.

¹ A Participating CMS Provider is an FCC licensee providing commercial mobile service as defined in section 332(D)(1) of the Communications Act of 1934 that has voluntarily elected to transmit WEA Alert Messagers under part 10 of the FCC's rules. See 47 CFR §10.10 (d), (f)



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The majority of exercise play will be visible from the terminal and State Highway Loop 12. Considering the inherently transient nature of the airport and highway population, it is in the public's interest that a WEA be sent to inform the public that there is no real-life emergency occurring. This benefits the City of Dallas, as alert originators, by providing an opportunity to collect data on the effectiveness of a WEA message in an airport setting.

The City of Dallas does not intend to rely solely on WEA to inform the public. In the weeks leading up to the exercise, a robust public information campaign will be shared with Public Information Officers in surrounding jurisdictions, distributed to all Dallas-Fort Worth media outlets, including daily newspaper and radio and television outlets, and posted on social media. This public information campaign will inform the public about the Dallas Love Field exercise but also include information about the WEA test including the time, date, and content of the message so that it is clear the WEA will be sent just before the exercise starts. Additionally, outreach materials will address that the WEA test is, in fact, only a test; that mobile devices in the area surrounding the targeted area may also receive the WEA test; and, that there is a possibility for the public to receive duplicate WEA messages. The City of Dallas will also coordinate information about the test with the Participating CMS providers that operate within the City of Dallas, and all emergency authorities that operate within the City of Dallas, including police, fire, and 911 public safety answering points.


On November 2nd, terminal announcements, terminal messages on the flight information display system, social media, and dynamic message signs on the roadway will disseminate information about the exercise. In a real emergency, the City of Dallas may send a WEA in addition to these other methods. Conducting this test allows us to evaluate its effectiveness alongside other notification methods while increasing our overall proficiency in using WEA as an alerting tool.

Additionally, the WEA message includes a link to a webpage with additional information about the exercise and a survey so that the public can provide feedback about how they received the alert. This survey asks respondents to indicate how well they believed the WEA worked in relation to the other methods of notification (e.g. terminal announcements, dynamic message signs, etc.).

The City of Dallas Office of Emergency Management plans to record test results and provide a detailed account of any problems that occur in the distribution of the WEA test to your office.

If you have any questions or need further information, please contact Travis Houston, Senior Emergency Management Specialist, City of Dallas Office of Emergency Management at travis.houston@dallascityhall.com or (214) 670-4279.

I appreciate your consideration in this matter.

Sincerely,


Rocky Vaz
Director, City of Dallas
Office of Emergency Management