



March 7, 2018

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: NCR Wireless Emergency Alert Test—PS Docket No. 15-91

Dear Chief Wilhelm:

The Metropolitan Washington Council of Governments (COG) Emergency Managers' Committee, which functions as the Regional Emergency Support Function 5 (RESF 5) group for the National Capital Region (NCR), would like to request an FCC Rule Waiver on behalf of Participating Commercial Mobile Service (CMS) Providers to conduct a live Wireless Emergency Alert (WEA) National Capital Region (NCR) test.¹ The region would like to use the Everbridge Notification System on April 2, 2018, and if necessary, a back-up date of April 5, 2018, at 10:00AM (EDT).

The live test, pending your approval, is scheduled to occur between 10:00AM-10:30AM and will involve the use of the WEA text message and official e-mail list portion of the Integrated Public Alert and Warning System (IPAWS). The message is planned to broadcast only to cell phones in the NCR and e-mails sent only to local officials participating in the test.

The test message will read: *"This is a test of the [jurisdiction name] Wireless Emergency Alerts. No action is required."*

The test is not intended to be a substitute for other scheduled tests of Wireless Emergency Alerts. This will be the first live region-wide test of the WEA system for the NCR and will build on the country's first live, geo-targeted WEA conducted by the District of Columbia as part of planning for the 58th Presidential Inauguration on January 15, 2017.

As Emergency Managers, we are tasked with public information and warning, which includes alerts and notifications to our residents and both local and federal officials during emergencies and incidents that impact life, safety, and property. The purpose of this test is to ensure that the WEA system will work during such emergencies region-wide within the NCR, which includes the District of Columbia, and portions of the State of Maryland, and the Commonwealth of Virginia. As recent events in Hawaii and California demonstrate, it is essential that the public be familiar with WEA, and that emergency managers be proficient in the use of WEA before the initiation of an actual alert is necessary in the NCR. Accordingly, COG believes that it is imperative that it test the system now, rather than wait until May 2019 for the FCC's end-to-end testing rules to become effective.

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 Messages under part 10 of the FCC's rules. See 47 CFR §10.10 (d), (f).

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In addition, the COG NCR Public Information Officers' group (Regional Emergency Support Function-15) is currently working on a multi-media public announcement advertisement and marketing plan for the proposed upcoming NCR WEA test to ensure public understanding of the function and utility of WEA, and that the April 2 WEA message is in fact a test. This plan will be shared with the PIOs in all affected jurisdictions for distribution to all NCR media outlets, including daily newspapers and radio and television outlets, and will be posted on social media. The COG NCR PIO Group has also coordinated information about the test with the Participating CMS providers that operate within the NCR, as well as with all emergency authorities that operate within the NCR, including first responder organizations such as police and fire agencies and 911 public safety answering points (PSAPs), to ensure that they are aware of the test and can confirm to the public that the WEA message is a test.

The Emergency Managers plan to record test results and provide a detailed account of any problems that occur in the distribution of the WEA test to your office.

The participating jurisdictions are Fairfax County, Prince William County, City of Alexandria, Arlington County, Loudoun County, City of Falls Church, City of Manassas, City of Manassas Park, City of Fairfax, City of College Park, City of Gaithersburg, City of Rockville, Prince George County, City of Takoma Park, Montgomery County, City of Greenbelt, City of Bowie, and the District of Columbia.

If you have any questions or need further information, please contact Sulayman Brown, Assistant Coordinator, Fairfax County Office of Emergency Management at Sulayman.brown@fairfaxcounty.gov or 703-483-1356.

I appreciate your consideration in this matter.

Sincerely,



Ronald Gill
Chairman, COG Emergency Managers Committee
Director, Prince George's County of Emergency Management

cc: Mark Jinks, COG Chief Administrative Officers Committee Chairman
Tim Hemstreet, NCR Homeland Security Executive Committee Chairman