



# City of Helena

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## City of Helena

March 8, 2019

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

### **Re: AMENDED - Lewis and Clark County application for FCC Rule Waiver.**

Dear Mr. Wilhelm,

The City of Helena and Lewis and Clark County hereby amends its letter dated February 19, 2019.

The City of Helena and Lewis and Clark County (FIPS:30049) would like to request a FCC Rule Waiver exemption from 47 CFR Part 10 to conduct a live Wireless Emergency Alert (WEA) test on behalf of the participating commercial wireless providers. The special WEA test is planned for 11:00 AM (MST) Wednesday April 10, 2019. Should a real-world event occur, that interrupts the ability to initiate the test; an alternate date of Wednesday April 17, 2019 at 11 AM (MST) is planned. If approved, the live WEA test will be initiated through our emergency notification system (RAVE Alert) between the hours of 11:00 AM and 11:30AM (MST). The live test will expire 30 minutes after its initiation and it will not include the Emergency Alert System (EAS).

The live test message will be sent through the WEA portion of the Integrated Public Alert and Warning System (IPAWS) and is intended to alert all enabled wireless telephones within the geographic boundaries of Lewis and Clark County, Montana. The test message will read, "*A test of Lewis and Clark County's Wireless Emergency Alert system. No action required*".

Our public safety officials and emergency management team are tasked with public information and warning, which includes alerts and notifications to our community during emergencies that impact life, safety and property. The City of Helena and Lewis and Clark County face a wide variety of hazards that could impact our community and its visitors. We believe it's important to test the WEA capabilities before spring flooding, summer wildland fires and evacuation notices take a prevailing role in our community. The City of Helena and Lewis and Clark County is also susceptible to severe winter storms, grid failures, earthquakes and hazardous materials releases. Moreover, having the ability to alert non-resident visitors and transient travelers of a local area emergency via a WEA message is very important.

The focus of this live test is to ensure the IPAWS/WEA system is effective for future local emergencies that possess an imminent threat, the public is familiar with WEA and that local officials are proficient in the use of sending WEA messages before the initiation of a real-world crisis. Accordingly, the City of Helena and Lewis and Clark County believe it is imperative to test the system now, rather than wait until the FCC's new WEA end-to-end testing rules become effective May 1, 2019.

Leading up to April's test, we have successfully conducted a number of WEA tests with the IPAWS lab. Furthermore, on December 14, 2018, we received a webinar tutorial from the IPAWS lab in preparation for this live WEA test. More IPAWS lab tests are planned before the live test on April 10<sup>th</sup>, 2019. Fourteen days prior to the actual test date, a local multi-media campaign will commence to ensure the public understands the purpose of the Wireless Emergency Alert; what its used for; what is expected; the date and time of the test; date and time of the alternate test and an awareness that the April 10, 2019 WEA alert is just a test.

Notification of our petition for waiver to the FCC has been made known to public safety, public safety answering points and emergency managers of our seven surrounding counties. Additional notification has been made to our larger state, local and private institutions within the City of Helena and Lewis and Clark County. These include the public school district, state government, local government, state and local disaster and emergency services, VA and regional hospitals and the national weather service. Outreach to the area's commercial wireless providers has been conducted regarding the live WEA test. To date, no objections have been raised by any of the aforementioned stakeholders.

Lastly, it's our intent to develop a plan to capture the effectiveness of the WEA test via an on-line survey. If requested, the results can be made available to commercial wireless providers or the FCC. If you have questions or need further information, please contact me at 406-447-8233 or [pcallahan@helenamt.gov](mailto:pcallahan@helenamt.gov).

Sincerely,



Peter Callahan  
Manager

City of Helena / Lewis and Clark County 911 Center  
COG ID: 201025

Cc: National Weather Service Great Falls, Montana Disaster and Emergency Services, Lewis and Clark County Disaster and Emergency Services, Lewis and Clark County Sheriff's Office, Lewis and Clark County Communication and Community Outreach Coordinator, State of Montana Department of Administration, Jefferson County Sheriff's Office, Helena Police Department, Broadwater County Sheriff's Office, Helena City Manager, Helena Public Schools, East Helena Police Department, East Helena Public Schools, Lewis and Clark County Chief Administrative Officer, Lewis and Clark County Rural Fire Council, Helena Fire Department, St. Peters Health and Montana Department of Justice.