



October 30, 2017

**Big City Emergency Managers**  
1620 L Street NW, Suite 200  
Washington DC 20036

**Chairman Ajit Pai**  
**Commissioner Mignon Clyburn**  
**Commissioner Michael O'Rielly**  
445 12th Street SW  
Washington DC 20554

**Mr. Chairman and Commissioners,**

The Northern California Wildfires have claimed 42 lives, destroyed 8900 structures and caused the evacuation of 40,000 residents. The Las Vegas shootings killed 58 people and injured more than 500 others. Irma (September 7, 2017) hit Florida and then Maria (September 24, 2017) cut across Puerto Rico, causing massive damage. Hurricane Harvey brought the largest flooding event in United States history, causing very specific voluntary evacuations throughout the region.

In all of these events, receiving a timely emergency alert on your mobile phone could have been the difference between life and death. A few more minutes to evacuate, an order to stay put, or a warning not to enter an area could all have been done with the enhanced geo-targeting capabilities we are pushing for in Wireless Emergency Alerts (WEA).

The devastation of the last three months has been massive and we as emergency managers will continue the recovery process. The time to act is now. We are writing to express our concern that a device-assisted geo-targeting capability timeline and requirement were not included in the Commission's September 29th, 2016 WEA Report and Order, but instead referred to the Commission's accompanying Further Notice of Proposed Rulemaking for additional consideration.

More than ten years ago, a bipartisan group of legislators developed the Warning, Alert, and Response Network (WARN) Act. That law requires the FCC to adopt technical standards---effective, reliable, integrated, flexible, and comprehensive---for wireless providers to transmit emergency alerts to their subscribers. The FCC worked with the wireless industry to develop a WEA system for mobile phones. These short messages should provide essential and time-sensitive public safety information without requiring any advanced planning by subscribers.

In theory, the WEA system enables state, county, and municipal authorities to instantly warn their residents. However, across the country, WEA goes largely unused because it is not precise enough. The record is clear that device-assisted upgrade is feasible. As the FCC acts to improve the precision of WEA through

using the intelligence of the device, it cannot miss the mark. The entire polygon needs to be alerted with negligible bleed over, as outlined in the CSRIC VI report. The granularity of the geo-targeting capabilities of WEA is critical.

We urge this requirement to be adopted this year and be in place for use by public safety officials and in cell phones no later than the spring of 2019.

Sincerely,



Barb Graff  
Chair, Big City Emergency Managers  
Director, City of Seattle Office of Emergency Management



Ron Prater  
Director, Big City Emergency Managers