



April 24, 2019

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Wireless Emergency Alerts*, PS Docket No. 15-91; *Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket No. 15-94

Dear Ms. Dortch:

Wireless Emergency Alerts (WEA) are one of our nation's most effective emergency alerting tools for federal, state and local alert originators to warn and inform millions of wireless consumers about imminent threats, such as tornados, wild fires and hurricanes, abducted children (AMBER alerts), and nationwide emergencies. For this reason, CTIA and its member companies across the wireless industry support continued efforts to enhance the WEA system in ways that align with alert originator and consumer expectations.

Per the Commission's rules¹, by May 1, 2019, participating commercial mobile service providers (CMSPs) are required to support (1) 360-character WEA messages, (2) Spanish-language WEA messages, (3) Public Safety WEA messages, (4) Alert Message prioritization, and (5) consumer opt-in capabilities for receiving State/Local WEA test messages (collectively WEA 2.0). CTIA respectfully submits this letter to update the Commission that participating CMSP member companies have taken the necessary steps

¹ *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91 and 15-94, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 11112 (2016) (*2016 WEA Order*); *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91 and 15-94, Second Report and Order and Second Order on Reconsideration, 33 FCC Rcd 1320 (2018) (*2018 WEA Order*).



to meet the May 1, 2019 deadline, but cannot deploy the new WEA 2.0 capabilities until Federal Emergency Management Agency's (FEMA) Integrated Public Alert and Warning System (IPAWS) has the capability in place to support and complete its required testing for these new features.

The Commission's *2018 WEA Order* granted CTIA's petition to align the deadline for supporting Spanish-language WEA messages with the May 1, 2019 deadline for extending the length of WEA messages from 90 to 360 characters.² In that petition, CTIA also noted that each modification to WEA necessarily requires testing between FEMA's IPAWS gateway and participating CMSP networks and WEA-capable devices.³ The *2018 WEA Order* appropriately streamlined the testing process by aligning compliance deadlines for WEA 2.0 features around May 1, 2019, but the dependency on the testing capability of FEMA's IPAWS gateway remains a critical factor in participating CMSPs ability to support those features.

Participating CMSPs and handset manufacturers have taken the steps within their control to support WEA 2.0 features by the May 1, 2019 deadline, including updating the relevant standards, implementing WEA 2.0 capabilities into their networks and deploying WEA-capable wireless handsets utilizing both Google's Android and Apple's iOS that support WEA 2.0. However, CTIA has recently confirmed that FEMA's IPAWS gateway will not be ready to test WEA 2.0 by May 1, 2019.

Once FEMA's IPAWS gateway is capable of testing WEA 2.0, CTIA's participating member companies are ready to test as soon as practicable and deploy the capability in coordination with FEMA. In the meantime, the Commission and FEMA should coordinate efforts to inform federal, state and local alert originators about the status of WEA 2.0 enhancements and effective utilization of WEA's existing capabilities, including geo-targeting and embedded links.

² *2018 Order* at 33 FCC Rcd 1321, ¶ 1. See also, Petition for Reconsideration of CTIA, PS Docket Nos. 15-91, 15-94 (Dec. 1, 2016) (*CTIA Petition*).

³ *CTIA Petition* at 11.



CTIA and its member companies look forward to continuing to support the Commission's efforts to ensure alert originators across the U.S. can harness the proven life-saving capabilities of WEA.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Matthew B. Gerst
Vice President, Regulatory Affairs

CTIA
1400 16th Street NW, Suite 600
Washington, DC 20036