ARAM SAHAKIAN
GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EMERGENCY MANAGEMENT
DEPARTMENT
200 N. SPRING STREET, ROOM 1533
LOS ANGELES, CA 90012
TEL (213) 978-2222
TEL (213) 484-4800
FAX (213) 978-0517
www.emergency.lacity.org

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Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman and Commissioners,

After enduring several rounds of brush fires and repeated fall and winter storms, The City of Los Angeles Emergency Management Department and the rest of the country lack the technology updates to make the Wireless Emergency Alerts (WEA) system a strong and adaptable tool. We are writing to express our concern that multimedia enhancements have not been approved as a critical update for the WEA system.

Having a reference map for residents and visitors can mean the difference between action and non-action. An example of this is the recent brushfires that took place in the City of Los Angeles during 2017-18. Los Angeles needed the assistance of their residents and visitors to move them out of harm's way and place them in evacuation centers and/or shelters and issued WEA messages. Because of the system's limitations they were unable to include a map of the evacuation areas, only a reference for recipients to seek out this critical information via traditional media outlets. Less than half did. More recently was the use of WEA during the 2018 Winter Storms. Showing expected inundation areas and maps during large flooding events such as the Adverse Weather we experienced in January of 2018 could have shown where hazards were more easily than trying to describe a location in a text-based message. Images can show the protective actions rather than trying to explain them.

In this age of instant access to visual information via social media applications, we need to enhance our country's ability to rapidly, efficiently and securely deliver comprehensive emergency information, including images, to the public. Pictures provide instant recognition and speak a universal language. Most importantly, they enable rapid response from every potential witness who could save countless lives through fast action. Again, the brush fires and adverse weather storms in the City of Los Angeles highlighted this major weakness in the WEA system. Millions of residents who wanted to get information as to whether they were being evacuated or not were given no other option but to take additional time to search for this information. In any emergency, time is often a commodity we cannot afford to waste.

Allowing for multimedia content in WEA messages would greatly increase the ability of public safety officials to reach residents with access and functional needs. While efforts are being made to address the need for multilingual communications in WEA messages (REFERENCE 1), individuals who are deaf or hard of hearing need visual cues not currently available in WEA messages. American Sign Language (ASL) is a complete, complex language that employs signs made by moving the hands combined with facial expressions and postures of the body. It is the primary language of many North Americans who are deaf and is one of several communication options used by people who are deaf or hard-of-hearing. ASL is a language completely separate and distinct from English. It contains all the fundamental features of language—it has its own rules for pronunciation, word order, and complex grammar. (REFERENCE 2)
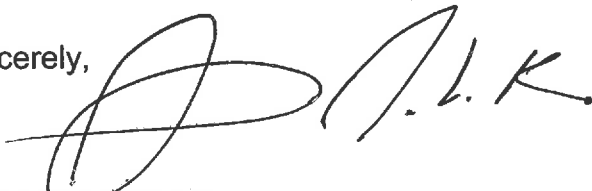
It is essential that we build on the progress already made by the FCC to continue improving the WEA system to its highest capacity. Allowing multimedia content, including images and instructional infographics, in WEA messages on 4G, 5G and all future networks is not only necessary, but expected from the public.

On January 30, the FCC took the first step toward making the nation's WEA system achieve these readily available technological upgrades. The adoption of geo-targeting standards will enhance the ability to send targeted messages, but without multimedia capability, the messages will still be limited in effectiveness. It is essential that we build on the progress already made by the FCC to continue improving the WEA system to its highest capacity. Allowing multimedia content, including thumbnail images and instructional infographics, in WEA messages on 4G, 5G and all future networks is not only necessary, but also expected from the public.

The City of Los Angeles Emergency Management Department urges the FCC to act to meet the need for multimedia enhancements to WEA messages. Failure to do so leaves The City of Los Angeles susceptible to more potential disasters without the ability to properly alert our residents. Failure to include these improvements to WEA is irresponsible to the residents that we are charged to serve and protect. It will erode the trust of wireless alert originators to send a timely, informative message when life or death may be on the line.

We respectfully request that the FCC take immediate action to ensure that industry meet these standards before more lives are put at risk.

Sincerely,

ARAM SAHAKIAN
General Manager

REFERENCES
1 See FCC Report and Order, paragraph 38, September 29, 2016
https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-127A1.pdf
2 See NIH NIDCD American Sign Language, https://www.nidcd.nih.gov/health/american-sign-language