

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Wireless Emergency Alerts)	PS Docket No. 15-91
)	
Amendments to Part 11 of the Commission’s)	PS Docket No. 15-94
Rules Regarding the Emergency Alert System)	

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials-International, Inc. (APCO)¹ submits the following comments in response to the above-captioned Public Notice inviting parties to refresh the record on the feasibility of including multimedia content in Wireless Emergency Alerts (WEA).² APCO continues to support incorporating multimedia content in WEA messages³ and recommends that the Commission adopt an approach to enhancing WEA that eliminates the disparity between what’s broadly available for wireless network users and what’s available for WEA.

The Commission asks to what extent “a requirement to support thumbnail-sized images and hazard symbols [would] spur Participating CMS Providers to integrate new technologies into their WEA systems that could improve their ability to support the low-latency transmission of high-quality multimedia content?”⁴ APCO appreciates this line of inquiry, as it raises the

¹ Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 30,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Public Safety Answering Points (PSAPs), dispatch centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

² Parties Asked to Refresh the Record on Facilitating Multimedia Content in Wireless Emergency Alerts, PS Docket Nos. 15-91, 15-94, *Public Notice*, DA 18-302 (Public Safety and Homeland Security Bur. rel. Mar. 28, 2018).

³ Comments of APCO, PS Docket Nos. 15-91, 15-94, at 3 (filed Dec. 8, 2016).

⁴ In the Matter of Wireless Emergency Alerts, Amendments to Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91, 15-94, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 16-127, at para. 130 (rel. Sept. 29, 2016).

prospect that one enhancement to WEA could produce system changes that facilitate subsequent enhancements. Broadly speaking, the Commission should encourage participating service providers to upgrade WEA systems in a manner that eliminates disparities between what's available to consumers and what's available to WEA alert originators. Arguments that the WEA system was not designed for certain capabilities should have no bearing on whether to incorporate capabilities that already exist in wireless networks.⁵ When technology exists that could save lives, it should be used to save lives. Wireless carriers are in a position to improve public safety, and they should ensure that upgrades to their networks can be used in parallel to improve emergency alerts.

APCO agrees with the Commission that “[a]llowing multimedia content in WEA Alert Messages would have tremendous public safety benefits.”⁶ Embedding photos, symbols, maps, and other multimedia content will improve emergency response and provide the public with better emergency information, which in turn will help reduce milling behavior and duplicative 9-1-1 calls. For several years, consumers have been able to send a high-quality multimedia message to multiple recipients with near-immediate delivery, even across other carriers' networks. The Commission should require support for multimedia in WEA no later than May 2019. Consolidating this enhancement with the deadline for other WEA improvements such as an expanded character limit will make consumer education and training for alert originators more efficient.

⁵ As the Commission notes, nothing in the WARN Act or the Commission's rules requires WEA to be a cell-broadcast-based service. *Id.* at n. 20.

⁶ *Id.* at para. 131.

The requirement to support multimedia content in WEA should not be limited to Public Safety Messages, thumbnail-sized images and hazard symbols, or 4G LTE and future networks.⁷ The assumption that the transmission of multimedia WEA messages would delay the receipt of time-sensitive alerts may not hold true, especially as wireless carriers continue to enhance their networks. Further, alert originators will be in the best position to judge whether the value added by multimedia content in a particular emergency outweighs any delay required for message composition and delivery.⁸ Thus, carriers should be required to transmit any type and quality of multimedia that an alert originator includes with any WEA message.

Respectfully submitted,

APCO INTERNATIONAL

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May 29, 2018

⁷ See *id.* at paras 126-27. The Commission should adopt aggressive WEA enhancements for all new devices and networks, and for existing devices and networks where technically feasible. This approach seems to have been effective thus far for the recent enhancements to include “clickable” embedded references and improved geotargeting. Technical infeasibility for a subset of devices or networks did not prevent incorporation for existing networks and devices.

⁸ Consider also that alert originators’ judgement over how best to use WEA will be augmented following the May 2019 effective date of the rule allowing for state and local testing.