

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Homeland Security and Emergency Management Agency

Muriel Bowser
Mayor



Dr. Christopher Rodriguez
Director

May 29, 2018

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

Mr. Chairman and Commissioners,

After participating in a successful regional test of the Wireless Emergency Alerts system, the District of Columbia still believes that Washington, DC, and the rest of the country, lack the key technology updates necessary to make the WEA system a stronger and more adaptable tool. We are writing to express our concern that multimedia enhancements have not been approved as a critical update for the WEA system.

The District of Columbia has successfully conducted two unprecedented tests of the WEA system. The first, on January 15, 2017, HSEMA conducted the nation's first live test of WEA on a targeted area to ensure that we could send direct emergency messages during the 58th Presidential Inauguration. More recently, on April 5, 2018, the District was one of 20 jurisdictions in the National Capital Region to simultaneously issue a test message to the public through the Wireless Emergency Alert (WEA) system. While both of these tests demonstrated our ability to provide key information to Washington, DC's residents, commuters, and guests, our WEA messaging was limited by the technical constraints of the WEA system.

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. The Chelsea bombings in New York City highlighted this major weakness in the WEA system. Millions of residents who wanted to help find the suspect were given no other option but to take additional time to search for his photo. In any emergency, time is often a commodity we can't 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, 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.

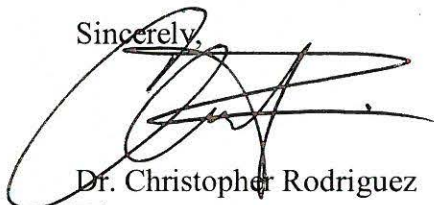
It is essential that we build on the progress already made by the FCC to continue improving the WEA system to its highest capacity. Allowing multimedia content, including images and instructional infographics, in WEA messages on 4G, 5G and all future networks is not only necessary, but expected from 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 District of Columbia Homeland Security and Emergency Management Agency urges the FCC to act to meet the need for multimedia enhancements to WEA messages. Failure to do so leaves Washington, DC susceptible to more potential disasters without the ability to properly alert our citizens. Failure to include these improvements to WEA is irresponsible to the citizens 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,



Dr. Christopher Rodriguez
Director