

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Wireless Emergency Alerts)	PS Docket No. 15-91
)	
Amendment of Part 11 of the Commission’s)	PS Docket No. 15-94
Rules Regarding Emergency Alert System)	
)	
Parties Asked to Refresh the Record on)	DA 18-302
Facilitating Multimedia Content in Wireless)	
Emergency Alerts)	

REPLY COMMENTS OF T-MOBILE USA, INC.

T-Mobile USA, Inc. (“T-Mobile”)¹ hereby addresses comments filed in response to the Public Notice issued by the Public Safety and Homeland Security Bureau (“Bureau”) seeking to update the record on facilitating multimedia content in Wireless Emergency Alerts (“WEA”).² T-Mobile agrees with commenters that WEA messages play a critical role in distributing information about emergencies and other public safety matters and is committed to empowering its customers with effective tools, such as WEA messages, to ensure their health, welfare, and safety.

INTRODUCTION AND SUMMARY

Support for WEA is widespread across the commercial wireless ecosystem. As CTIA describes, service providers and equipment manufacturers have and will continue to take important steps to enhance the WEA system.³ T-Mobile itself has long participated voluntarily

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

² *Parties Asked To Refresh The Record On Facilitating Multimedia Content In Wireless Emergency Alerts*, Public Notice, DA 18-302 (Mar. 28, 2018) (“WEA Multimedia PN”).

³ Comments of CTIA, PS Docket Nos. 15-91 & 15-94, at 3-4 (filed May 29, 2018) (“CTIA Comments”).

in WEA and has actively participated in various industry working groups evaluating and laying the foundation for WEA development.⁴

As discussed below, however, the record demonstrates that there are notable technical challenges and operational limitations involved in embedding multimedia content in WEA messages.⁵ Given these issues, T-Mobile agrees with commenters that – rather than adopt additional requirements at this time – interested stakeholders should (i) evaluate how recent enhancements, including ones set to take effect in 2019, have been leveraged to improve wireless alerting and (ii) continue to work together voluntarily to determine how best to enhance the WEA system.⁶

DISCUSSION

I. COMMENTERS IDENTIFY NOTABLE CHALLENGES TO EMBEDDING MULTIMEDIA CONTENT INTO WEA MESSAGES

In response to the Bureau’s request for information regarding the feasibility of including multimedia content in messages,⁷ various commenters mention that the current WEA platform is not designed to deliver this type of content.⁸ WEA messages currently are delivered using the Cell Broadcast Service (“CBS”) and this technology was not designed for the transmission of

⁴ See, e.g., CSRIC V, Working Group 2, Wireless Emergency Alerts – Recommendations to Improve Geo-Targeting and Offer Many-to-One Capabilities, Final Report & Recommendations (Sept. 2016), https://www.atis.org/01_legal/docs/CSRIC%20V/WG2_WEA-GeoTarget_091416.docx.

⁵ See, e.g., CTIA Comments at 5-13; Comments of the Alliance for Telecommunications Industry Solutions, PS Docket Nos. 15-91 & 15-94, at 3-5 (filed May 29, 2018) (“ATIS Comments”); Comments of AT&T, PS Docket Nos. 15-91 & 15-94, at 2-5 (filed May 29, 2018) (“AT&T Comments”).

⁶ See, e.g., CTIA Comments at 5-13; ATIS Comments at 3-5; AT&T Comments at 2-5.

⁷ WEA Multimedia PN at 1.

⁸ See, e.g., CTIA Comments at 5-11; ATIS Comments at 3-5; AT&T Comments at 2-5.

multimedia messages. As the Alliance for Telecommunications Industry Solutions (“ATIS”) notes in its comments:

The results of ATIS *Feasibility Study for WEA Supplemental Text* (ATIS-0700026) remain relevant to this matter. This study addressed several aspects of the transmission of multimedia content in WEA messages, including the display of photos and hazard alert symbols and concluded that there remain unresolved technical and/or other considerations that warrant against requiring the inclusion of this content in WEA messages. . . .

Multimedia in WEA messages also will have implications for meeting character limits. . . . [E]ven a relatively small multimedia file would still be too large to transmit in WEA as it would require multiple WEA binary 360-character messages.⁹

In addition, the record reinforces concerns expressed about the potential for significant delays in information delivery. As one commenter noted:

While cellular networks regularly carry rich multimedia messages on normal days throughout the world, there are times when multimedia messages experience significant latency and deliverability problems. . . . The use of cell broadcast for Wireless Emergency Alerts avoids the congestion on the normal cellular data channels under those conditions. But cell broadcast does not have the same capacity for large multimedia messages as the normal cellular data channels.¹⁰

Technical feasibility must be taken into consideration when examining multimedia alerting capabilities for WEA.

The record also demonstrates that Evolved Multimedia Broadcast Multicast Service (“eMBMS”) is not currently a viable option for multimedia WEA messages.¹¹ According to

⁹ ATIS Comments at 3-4 (citations omitted).

¹⁰ Comments of Sean Donelan, PS Docket Nos. 15-91 & 15-94, at 2 (filed May 29, 2018) (also noting that “Emergency managers should be cautious extrapolating network performance during normal conditions to expected performance during disaster conditions”).

¹¹ ATIS Comments at 6; AT&T Comments at 5-6; CTIA Comments at 11-12.

CTIA, “the ability of eMBMS to support WEA messages remains unclear . . . [and] implementation of eMBMS would require significant technical and operational changes in the handling of WEA messages. . . . eMBMS is simply not available to support multimedia content for WEA today”¹² ATIS similarly notes the significant technical work necessary before eMBMS could be considered as a platform for delivering multimedia WEA messages, but also emphasizes that “implementation of eMBMS would require deployment of new underlying network capabilities and significant changes to service providers’ networks.”¹³

Based on the foregoing, T-Mobile urges the Commission to proceed cautiously as it examines the viability of transmitting multimedia alerts.¹⁴

II. INTERESTED STAKEHOLDERS SHOULD CONTINUE TO WORK COLLABORATIVELY TO ENHANCE WEA CAPABILITIES

The FCC, wireless industry, and public safety community have been successful in introducing new, valuable capabilities to the WEA service, with additional improvements being implemented in the next year and a half. Although additional WEA features may ultimately prove beneficial and viable, further study is required to evaluate the impact of such changes to the existing WEA infrastructure and ensure that good intentions do not jeopardize the stability of this valuable alerting tool.¹⁵ As ATIS notes, “the industry is already focusing substantial

¹² CTIA Comments at 11-12 (citation omitted).

¹³ ATIS Comments at 6.

¹⁴ Because every second may count in an emergency, T-Mobile questions suggestions that multimedia messaging should be required even if it introduced significant delays of several minutes into the WEA system. *See* Comments of the New York City Emergency Management Department, PS Docket Nos. 15-91 & 15-94, at 5 (filed May 29, 2018) (“NYCEM Comments”).

¹⁵ *See* ATIS Comments at 3-4. As noted by the National Center for Missing and Exploited Children, it also is critical to ensure that the delivery of messages remains reliable and error-free. Letter from Michelle C. DeLaune, Senior Vice President & Chief Operating Officer, National Center for Missing and Exploited Children, to Marlene H. Dortch, Secretary, FCC, PS Docket Nos. 15-91 & 15-94, at 2 (filed May 29, 2018).

resources to enhance WEA through late 2019 at the earliest. . . . Additional work to develop technologies and implement any new multimedia requirements would complicate these ongoing efforts across the ecosystem, . . . be counterproductive and could slow the industry’s work.”¹⁶ Thus, rather than adopt additional WEA requirements now, T-Mobile urges the Commission to encourage stakeholders to continue working together voluntarily to (i) ensure that the existing WEA system, including enhancements that will be implemented next year, is used to its full potential and (ii) investigate ways to further enhance WEA capabilities should there be a consensus among stakeholders that additional features are necessary.¹⁷

Both text and multimedia content can be obtained via the WEA system today. The recently implemented requirement that WEA service provider participants support embedded references (such as URLs) provides alert originators a viable option for directing the public to multimedia content should they want to access it. Stakeholders should be given the opportunity to evaluate whether this capability – which only became mandatory last fall – obviates the need for additional rules mandating the provision of additional content types in WEA messages. Moving forward in this fashion will ensure that WEA messages are optimally used within the confines of the existing system and that appropriate technical standards and enhancements can be tested and implemented without destabilizing wireless networks or the WEA platform.

¹⁶ ATIS Comments at 6-7.

¹⁷ Numerous alert originators are now certified by FEMA and authorized to utilize the system, with additional applicants continuously enlisting. These parties have varying missions and objectives and place differing expectations on the system’s capabilities and performance. For instance, the NYCEM indicates that multimedia messaging should be required even if it introduced significant delays of several minutes into the WEA system. *See* NYCEM Comments at 5. While this position may be satisfactory to some alert originators, others might maintain a different viewpoint and feel that every second counts in an emergency. Thus, additional conversations amongst stakeholders to level-set system performance expectations may be more beneficial than moving forward with new requirements at this time.

CONCLUSION

T-Mobile reiterates its broad support for WEA but urges the Commission to exercise caution before adopting additional requirements that may unintentionally undermine the effectiveness of this important tool.

Respectfully submitted,

By: /s/ Steve Sharkey
Steve Sharkey
Shellie Blakeney
Eric Hagerson

T-MOBILE USA, INC.
601 Pennsylvania Ave., NW
North Building, Suite 800
Washington, DC 20004
(202) 654-5900

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