



June 18, 2019

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

[Submitted via FCC Electronic Comments Filing System]

Re: NOTICE OF EX PARTE PS Dockets 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting and 15-94 Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System

Dear Secretary Dortch:

On June 12, 2019, representatives of the New York City Emergency Management Department ("NYCEM"), the New York City Mayor's Office of Federal Affairs, and the New York City Office of the Chief Technology Officer (collectively "The City" or "NYC") participated in an *Ex Parte* meeting on the above captioned matters with representatives of the Federal Communication Commission's ("FCC") Public Safety and Homeland Security Bureau ("Commission").¹ During the meeting, the City provided the FCC with an overview of Notify NYC, our official emergency communications system, in particular, the steps the City has taken over the past two years to implement multilingual alerting. Beginning in July 2019, Notify NYC will offer most of its messages in 13 languages.

The City expressed its appreciation to the FCC for updating its rules to improve the nation's Wireless Emergency Alert System ("WEA") and its most recent efforts to ensure that the commercial mobile service providers ("CMSPs") are prepared to implement the improved geo-targeting requirements in November 2019.² Consistent with prior filings, the City discussed what it continues to see as gaps in the Wireless Emergency Alert System including³:

- Lack of multimedia
- Lack of "many-to-one" feedback from WEA messages
- Lack of delivery confirmation to WEA messages

¹ **NYCEM Participants** – Benjamin J. Krakauer, Assistant Commissioner for Strategy and Program Development; Rachel Sulaymanov, Executive Director of Intergovernmental Affairs, Brooks Hanesworth, Program Manager, Emergency Public Notification, Rebecca Baudendistel, Deputy Program Manager, Emergency Public Notification; **Mayor's Office of Federal Affairs Participant** – Rebecca Kagan Sternhell, Deputy Director and General Counsel; **Mayor's Office of the Chief Technology Officer** – Priya Shrinivasan, Director of Policy, Standards, and Legal Affairs; **FCC Participants** – Lisa Fowlkes, Esq., Chief, Public Safety and Homeland Security Bureau, Renee Roland, Esq., Special Counsel to the Bureau Chief

² See letters from the FCC Public Safety and Homeland Security Bureau to AT&T, Sprint, US Cellular, Verizon, and T-Mobile dated June 5, 2019.

³ See, for example, NYCEM comments filed in PS Dockets 15-91 and 15-94 on May, 29, 2018, June 27, 2019, September 10, 2018, October 9, 2018, and November 21, 2018.



- Continued reports of inconsistent WEA delivery
- Lack of multilingual messaging beyond Spanish
- No plans to advance WEA as part of the 5G roll out

Finally, the City expressed its eagerness for the federal Integrated Public Alert and Warning System (IPAWS) gateway to be upgraded to support the updated WEA rules that went into effect in May 2019.

As WEA is a mission-critical system, the City strongly urges the Commission to work swiftly with CMSPs to identify and correct technical issues that impede WEA and update the Commission's rules to make further improvements to the Wireless Emergency Alert System.

The City sincerely appreciates the Commission taking the time to discuss these issues and stands as a ready partner in the further advancement of our nation's alert and warning systems.

Respectfully submitted,

/s/

Benjamin J. Krakauer, MPA
Assistant Commissioner, Strategy & Program Development