



601 Pennsylvania Ave., NW  
North Building, Suite 800  
Washington, DC 20004

June 28, 2019

**VIA ELECTRONIC MAIL**

Lisa M. Fowlkes, Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Response to Letter Regarding Wireless Emergency Alerts (“WEA”)  
Enhancements, PS Docket No. 15-91

Dear Ms. Fowlkes:

T-Mobile USA, Inc.<sup>1</sup> (“T-Mobile”) submits this response to your June 5, 2019 letter seeking a company commitment to comply with the November 30, 2019 WEA geo-targeting deadline.<sup>2</sup> As a Commercial Mobile Service Provider that has elected to participate in WEA,<sup>3</sup> T-Mobile is committed to ensuring its compliance with the FCC’s regulations governing the service, including the WEA geo-targeting requirement, and that its customers have an optimal experience with this important public safety service.

Although the Commission set an extremely aggressive timeline in establishing the November 30, 2019 deadline for implementing geo-targeting,<sup>4</sup> T-Mobile has worked diligently to meet the deadline. T-Mobile has participated with all relevant stakeholders in the broader industry effort to implement the enhancements to the current WEA system mandated by the FCC, including the geo-targeting requirement,<sup>5</sup> and has worked

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

<sup>2</sup> Letter from Lisa M. Fowlkes, Chief, Public Safety and Homeland Security Bureau, Federal Communications Commission to Steve Sharkey, Vice President, Government Affairs, Technology and Engineering Policy, T-Mobile USA, PS Docket No. 15-91 (June 5, 2019).

<sup>3</sup> T-Mobile submitted to the FCC its election to participate “in-part” in the WEA service. *See* T-Mobile WEA Election Letter, PS Docket No. 15-91 (June 4, 2018).

<sup>4</sup> *See* T-Mobile WEA FNPRM Reply Comments, PS Docket No. 15-91 (Jan. 9, 2017). “The record demonstrates that it is premature to determine the required precision and deadline for implementation because both standards and the feasibility of particular precision benchmarks are currently under study by ATIS. T-Mobile agrees with CTIA that the Commission should withhold final action until ATIS has completed its work.”

<sup>5</sup> Wireless Emergency Alerts, Amendments to Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91, 15-94, *Second Report and Order and Second Order on Reconsideration*, 33 FCC Rcd 1320 (2018).



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individually with vendors and others to underscore the urgency of the effort and the need to meet the FCC deadline.

Satisfying the new geo-targeting requirement is particularly challenging, however, because it requires changes to both the network and handsets that must be done in accordance with industry standards and fully tested prior to deployment. Although the necessary network and device standards did not exist at the time the new geo-targeting requirement was adopted, these standards have since been developed by The Alliance for Telecommunications Industry Solutions (“ATIS”). Once they were published on May 6, 2019, manufacturers could proceed with equipment development. T-Mobile was a leading participant in the ATIS Wireless Technologies and Systems Committee that developed the standards.

Although the time between standards development and the implementation deadline are significantly shorter than normally required, T-Mobile has been closely working with network, chipset, handset, and test equipment vendors to expedite development, testing, and deployment of hardware and software necessary to support the new geo-targeting capability. As a result, T-Mobile’s network vendors and multiple handset suppliers have committed to a development and testing timeline that, if met, will enable T-Mobile to support WEA geo-targeting by the FCC deadline.

Assuming the vendors and suppliers meet their commitments and the implementation proceeds as anticipated, T-Mobile is optimistic that the FCC deadline can be satisfied. This optimism, however, is contingent upon the absence of any problems being identified between the date of this letter and November 30<sup>th</sup> – there is little flexibility to account for correction of such issues. While T-Mobile tries to anticipate all of the changes necessary to implement a new feature, testing is a critical part of the process and it is not unusual for testing to reveal the need for additional changes. If it turns out that adjustments are needed as a result of unforeseen or unavoidable delays (*e.g.*, in deliveries of network or handset software and/or in testing schedules), T-Mobile’s ability to meet the deadline will be put in jeopardy.

Please be assured that deployment of the WEA geo-targeting requirement is a priority for T-Mobile and we are making every effort to meet the FCC deadline for implementation.



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If you have any questions regarding T-Mobile's response to your letter, please do not hesitate to contact me.

Respectfully Submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey  
Vice President, Government Affairs  
Technology and Engineering Policy

cc: Linda Pinto