



## City of Philadelphia

Office of Emergency Management

Fire Administration Building

240 Spring Garden Street, Lower Level

Philadelphia, PA 19123

[@PhilaOEM](http://www.phila.gov/ready)

July 8, 2019

Public Safety and Homeland Security Bureau  
Federal Communications Commission

445 12<sup>th</sup> Street SW  
Washington, DC 20554

To Whom It May Concern, In Reference to PS Docket Nos. 15-91 & 15-94:

I am writing on behalf of the City of Philadelphia's Office of Emergency Management (OEM) to express our interest in participating in the Wireless Emergency Alert System's (WEA) geographic targeting accuracy test to occur later this year. This capability and its success are of great interest to OEM and the City. As a designated city and county, Philadelphia is home to over 1.5 million people, increasing to 1.8 million during the day with workers and visitors. The WEA is a powerful tool that is currently met with some skepticism in the City. Given the City's threat and hazard profile, we are very much interested in better understanding this tool and gaining confidence in its use. Additionally, through this effort, we hope to strengthen working relationships with Commercial Mobile Service Providers for both WEA capabilities and other disaster recovery issues.

To support our interest, we posit the following:

1. OEM will work on multiple fronts to organize a large group of test participants that are customers of the several participating CMS Providers in the jurisdiction. The following groups will be leveraged to ensure a diverse sample: a) the public through a robust public education and participation campaign akin to what OEM conducts regularly (*see point #3*); b) OEM Emergency Management Liaisons – nearly 400 contacts representing 28 different government and industry organizations within the city and the region; c) OEM staff; and d) the 63 Philadelphia Fire Department stations that are staffed 24x7.
2. The large group of test participants will be geographically disbursed through the following assurances: a) randomness of location of public participants at time of testing; b) geographic diversity of OEM Liaisons and randomness of their locations at time of testing – both within and outside of the city; c) OEM staff strategically positioned in areas of significant interest and known poor representation; and d) the existing distribution of Philadelphia Fire Department stations with at least one station in each city ZIP code.
3. OEM regularly engages the public to prepare residents for emergencies and update them on active incidents. Using traditional media; social media; ReadyPhiladelphia – the mass notification system; ReadyHome – public education; and ReadyCommunity – intensive

neighborhood training and community-based emergency planning, OEM is poised to promote public awareness about the WEA test and the capability in general. An example of this is the routine awareness created by OEM related to impacts and preparedness for the many public special events which occur in Philadelphia – including multiple recent National Security Special Events.

4. OEM has the authority and the capability for the City/County of Philadelphia to send WEA messages, including Test Messages. This capability is maintained through two vendor-supported, agency-managed systems: *Everbridge* and *Comlabs* products. The systems are internally tested weekly from the 24x7 OEM Regional Integration Center.
5. OEM regularly uses data to inform efforts. Most notably, the office has developed a tool that is designed to measure the potential consequences of different threats to planned special events. This tool required combining multiple data sources and deriving calculations to provide assessments. A survey that is specific to data collection and analysis for WEA would be developed to be distributed to all intended test participants. Foremost, the survey would seek to confirm successful receipt of WEA message; location at time of testing; carrier of device being tested; time at receipt of message; and message content.

In summary, the City of Philadelphia and Office of Emergency Management look forward to the opportunity to participate in the WEA accuracy tests to occur in the future. This Office has demonstrated and can further demonstrate the ability to meet criteria put forward by the Bureau and more. Please do not hesitate to reach out with any questions.

Respectfully,



Dominick L Mireles  
*On behalf of Director Adam Thiel*

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