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July 19, 2016

Via Email
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte PS Docket 16-32

Dear Ms. Dortch:

On July 15, 2016, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Wireless Technologies and Systems Committee (WTSC) met via telephone with representatives of the Public Safety & Homeland Security Bureau (PSHSB) and International Bureau (IB). ng work program related to earthquake early warnings was discussed. This discussion focused on questions posed by the FCC:

Whether CMS Providers have ever transmitted any Earthquake or Tsunami alerts over Wireless Emergency Alerts (WEA), using SIB 12? ATIS noted that it is unaware of any earthquake or tsunami alerts over WEA and that there are no standards defined to support this approach. ATIS also reiterated its previously-expressed view that WEA should not be used to transmit earthquake or tsunami alerts.

Whether participating CMS Providers have ever used SIB 10 and SIB 11 to transmit earthquake alerts? ATIS noted that it is not aware of any use of SIB 10 or 11 for earthquake alerts in North America.

What potential issues may exist related to the use of SIB 10/11 for earthquake alerts? ATIS noted that its Feasibility Study for Earthquake Early Warning System ATIS-0700020) examined 3GPP earthquake warning functionality as well as the existing Earthquake Early Warning System (EEWS) that has been deployed in Japan. Additionally, a new work program within ATIS WTSC will consider SIB 10/11 as one of the candidates for earthquake alerts. ATIS

it is currently specified in 3GPP Public Warning System (PWS) specifications may not suitable for North American deployments. ATIS will have more information on the suitability of SIB 10/11 for EEWS upon completion of this ongoing work program.

What kind of delays would be expected for general WEA messages? ATIS noted that a new WTSC EEWS Requirements and Architecture deliverable will look at the network and end-to-end system delays for primary and secondary earthquake alerts. ATIS also noted that, based on stakeholder input, including input from the State of California and the United States Geological Survey regarding their preliminary review of the requirements, it is not feasible for WEA to meet

the requirements for the rapid delivery of earthquake alerts. ATIS is continuing and expanding this outreach to include other stakeholders such as the States of Oregon and Washington, Canada, FEMA and DHS. Finally, it was noted that each service provider may have different delay intervals associated with WEA based on their implementations and network configuration.

How did ATIS come up with 20 seconds average delay that was included in its EEWS Feasibility Study? ATIS noted that this figure represented an educated estimate based on the preliminary input received by WTSC and represented the consensus view at the time the study was completed. However, this initial estimate is being reviewed as part of the new work program aimed at developing requirements and architecture for EEWS.

What is a reasonable eNB cell broadcasting delay for primary earthquake messages? ATIS will review this issue and provide more information in the near future.

Could early earthquake warnings over WEA be prioritized? While ATIS does not believe that WEA is the appropriate mechanism to deliver sufficiently timely EEWS alerts, it notes it should be technically possible to prioritize these alerts (similar to the prioritization of Presidential Alerts via WEA).

and technical issues associated with EEWS were raised during the call. ATIS WTSC will further discuss these questions and provide information to the Commission at a later date.

In attendance were the following FCC representatives: Rasoul Safavian (PSHSB), Behzad Ghaffari (PSHSB), Steven Carpenter (PSHSB), Dave Munson (PSHSB), James Wiley (PSHSB) and Linda Pintro (IB). In attendance representing ATIS WTSC were: Peter Musgrove (AT&T), WTSC EEWS Subcommittee Chair; Orlett Pearson (Nokia); Farrokh Khatibi (Qualcomm), WTSC Radio Access Networks (RAN) Subcommittee Vice Chair; Tom Goode, ATIS General Counsel; and Steve Barclay, ATIS Director of Global Standards Development.

A copy of this letter is being submitted on the record of the above-referenced docket. If there are any questions, please contact the undersigned.

Sincerely

Thomas Goode
ATIS General Counsel

cc: Rasoul Safavian, Chief Technologist, Emergency Response Interoperability Center, PSHSB
Behzad Ghaffari, Chief Systems Engineer, PSHSB
Steven Carpenter, Cybersecurity Engineer, PSHSB
David Munson, Attorney Advisor, PSHSB

James Wiley, Legal Advisor, Incentive Auction Task Force, PSHSB
Linda Pintro, Senior Legal Advisor, Strategic Analysis and Negotiations Division, IB