



Robert G. Morse  
Assistant General Counsel  
Federal Regulatory and Legal Affairs

1300 I Street, NW, Suite 500 East  
Washington, DC 20005  
Phone 202.515.2444  
Fax 202.289.6781  
[robert.morse@verizon.com](mailto:robert.morse@verizon.com)

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**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Wireless Emergency Alerts  
PS Docket No. 15-91**

Dear Ms. Dortch:

On July 28, 2017, Lawrence Rybar, Xiaomei Wang and I of Verizon met via teleconference with the following staff of the Commission's Public Safety and Homeland Security Bureau: James Wiley, Megan Henry, Emily Talaga, Linda Nagel, Marcus Brown, and Eric Manski. The attendees discussed several of staff's questions on issues relating to the Commission's *Further Notice of Proposed Rulemaking* in the above-referenced proceeding.

Verizon's responses were consistent with its earlier comments.<sup>1</sup> Verizon reiterated its support for the cell broadcast method of transmitting alerts, and cautioned that the availability of data-based technologies such as multicasting and evolved Multimedia Broadcast Multicast Service (eMBMS) is highly localized, not ubiquitous, so would not be uniformly available to transmit alerts to consumers. And because they are bandwidth intensive, those technologies require careful management of spectrum and network use to prevent congestion. Other issues discussed include:

- ***Geotargeting/Geofencing Methods.*** New device-based methods also could congest networks. They require that the alert originator's geographic area "polygon" transmit to the handset, which would require data compression or other clear limits to ensure that limited bandwidth for broadcasting WEA alert is used efficiently and that an alert does not lose too much of its 360 character capacity. Network capacity would also be affected if many devices in the same cell sector need to communicate with the network to obtain location and map updates. In addition, how quickly a device can obtain a location fix may depend on: whether the device's location capabilities are turned on, a factor under the control of the handset manufacturer rather than the service provider; and

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<sup>1</sup> See Comments of Verizon, PS Docket No. 15-91 (Dec. 8, 2016); Comments of Verizon, PS Docket No. 15-91 (Jan. 14, 2016).

the device's ability to reach out to a third party (non-carrier) location server. Verizon also cautioned that device location information capabilities are challenged in certain places, such as heavily forested and urban canyon environments. In any case, such requirements would necessarily need to be limited to LTE networks and capable LTE-enabled devices.

- ***Modes of Participation.*** Verizon reiterated that service providers' attestations as to whether they provide WEAs "in whole" or "in part" over their networks should remain simple and straightforward based on service coverage and the capabilities of the devices they offer. Requiring service providers to break down their WEA capabilities by network or spectrum band risks creating consumer and alert originator confusion by inaccurately implying material differences between competing providers' alerting capabilities.
- ***Application-Based Approach.*** Verizon could support an application-based approach to the delivery of WEA information to consumers using a pre-loaded application, subject to several important safeguards. A *single* application developed under FEMA's auspices, not multiple applications, would need to be used to ensure consistency across devices. And adequate security measures would be needed to ensure that the application has access only to information and functions on the device needed to deliver the alerts.

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This letter is submitted in accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned if there are questions concerning this filing.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert A. Morse". The signature is fluid and cursive, with the first name "Robert" and last name "Morse" clearly distinguishable.