



August 14, 2017

**Ex Parte**

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

*Re: Improving Wireless Emergency Alerts and Community-Initiated Alerting, PS  
Docket No. 15-91*

Dear Ms. Dortch:

On August 10, 2017, David Lacy Kusters and Tim Powderly of Apple Inc., and Rob Carter and I on behalf of Apple, spoke via telephone with Megan Henry, Linda Nagel, and Marcus Brown of the Public Safety and Homeland Security Bureau (“PSHSB”), at PSHSB’s request, to discuss the above-referenced proceeding. Apple appreciates the PSHSB’s invitation to discuss emergency alerting. The company shares the Commission’s goal of finding approaches that provide customers with the best experience with Wireless Emergency Alert (“WEA”) messages. During this meeting, Apple made the following observations in response to PSHSB’s questions.

*Device-based geo-targeting of WEA messages.* Apple observed that iPhones do not support device-based geo-targeting for WEA messages, and respectfully suggested that the Commission carefully assess the feasibility of this approach. Specifically, Apple explained that using device-based geo-targeting would likely significantly increase the latency of users seeing WEA messages, which could harm consumers by delaying their access to critical safety information. Apple cautioned against any device-based geo-targeting WEA requirements that could result in significant battery drain in emergency situations, where battery life is particularly important. Apple also noted that mandated device-based geo-targeting would create consumer privacy issues.

In addition, Apple observed that device-based geo-targeting would still require coordination with carrier networks and could contribute to network congestion. Consumers could be harmed by congestion during a disaster if they were unable to receive critical

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
Page 2

information or to communicate with emergency services. Apple also explained that locating devices presents ongoing challenges in several environments regardless of the geo-targeting technology employed. Finally, Apple observed that carriers are already improving their network-based location technologies, and that industry inquiry into the feasibility of WEA geo-targeting is still ongoing.<sup>1</sup>

*Multilingual support.* Apple explained that iOS does not include an on-device functionality that automatically translates WEA messages. Moreover, emergency alerts should contain accurate and reliable translations, which are best provided by the alert originator. Apple also observed that legislation providing liability protection for providers of machine-based translations would be important before imposing any such requirement, but would not alleviate concerns about translation accuracy and reliability.

In addition, Apple noted that revisions to international technical standards are necessary to display messages to users in their preferred language, including for approaches that would rely on the use of pre-loaded messages. Apple respectfully requests that implementation timelines take into account the multi-year process to revise international technical standards. Finally, sending a large number of messages in numerous languages could lead to network capacity challenges in emergency situations.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information, please contact the undersigned.

Sincerely,



Paul Margie  
*Counsel for Apple Inc.*

cc: meeting participants

---

<sup>1</sup> See, e.g., ATIS, Feasibility Study for WEA Cell Broadcast Geo-targeting, ATIS-0700027 (2015).