



August 16, 2017

**VIA ELECTRONIC FILING**

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

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

Dear Ms. Dortch,

CTIA and its member companies have consistently supported the development, use, and evolution of the Wireless Emergency Alert (WEA) service. As part of the implementation of new capabilities and features for the WEA system, the Commission has required Commercial Mobile Service (CMS) Providers to support the transmission of embedded Uniform Resource Locators (URLs) and phone numbers in WEA Alert Messages.<sup>1</sup> CMS Providers are committed to working collaboratively with public safety and alert originators to develop the ability to receive and transmit WEA alerts with embedded references on their networks, and to work with mobile device and OS vendors to implement embedded, "clickable" references, but remain concerned about implementing such functionality without adequate time for development and feasibility testing. To ensure that "clickable" references are deployed in an effective manner, standards development and implementation are critical pre-requisites. CTIA believes, consistent with its Petition for Reconsideration filed in this proceeding,<sup>2</sup> that timelines for compliance with support of "clickable" references should be extended and only apply to new devices after a reasonable future compliance date.

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<sup>1</sup> *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91 and 15-94, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-127, ¶ 29 (rel. Sept. 29, 2016).

<sup>2</sup> Petition for Reconsideration of CTIA, PS Docket Nos. 15-91 and 15-94, at 2-9 (filed Dec. 1, 2016).



CTIA believes that this approach will allow for the deployment of “clickable” reference capabilities in WEA alerts in an effective and robust manner. However, should the Commission desire to apply these requirements to existing legacy devices, CTIA suggests that such a requirement be implemented in a tailored fashion. Only legacy devices that are technically capable of being updated to support “clickable” references (devices able to support a standard, regularly scheduled over-the-air update) without any additional undue effort or expense should be subject to such a requirement. CMS Providers and their mobile device equipment and OS vendors will be best positioned to make this determination, rather than prescriptive regulations to effectuate modifications to existing devices. In addition, a reasonable compliance period should be provided to ensure that all necessary standards to support “clickable” references are completed and tested prior to imposing such modifications on legacy or new devices. Implementation in this manner would be consistent with past enhancements to the WEA system and will ensure that the changes are technically and economically feasible for CMS Providers and mobile device equipment and OS vendors.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

*/s/ Matthew Gerst*

Assistant Vice President – Regulatory Affairs

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