August 21, 2019

Michael J. Wilhelm

Chief, Policy and Licensing Division

Public Safety and Homeland Security Bureau

Federal Communications Commission

445 1 Street SW

Washington, DC 20554

Re: San Miguel County Wireless Emergency Alert Test—PS Docket No. 15-91.

Dear Chief Wilhelm:

This letter is to respectfully request a limited waiver of the Commission's Wireless Emergency Alert (WEA) rules to permit Participating Commercial Mobile Service (CMS) Providers to participate in a WEA test conducted by the San Miguel County Sheriff’s Office, Emergency Management, in coordination with the San Miguel Emergency Telephone Service Authority and the San Miguel County Dispatch (PSAP). The San Miguel County Sheriff’s Office/Emergency Management is the sole Originating Authority for IPAWS in the County.

The purpose of conducting the test at this time is to ensure that emergency management officials in San Miguel County have a clear understanding of how alerts would perform in our mountainous area. San Miguel County hosts a large number of tourists year-round. During summer festivals and ski season our population can swell to tens of thousands more than our permanent residents. We cannot wait until the newly adopted FCC rules are implemented because we are highly vulnerable to numerous disasters. WEA is an excellent tool to reach visitors to the county, who most likely wouldn't have subscribed to our county's emergency alert system. Practically, it may prove to be the only tool that would be effective, especially in a large crowd at special events. The September timetable coincides with National Preparedness Month, and also is in line with a gap in between our busy summer festival season and the beginning of winter ski season. The end of September would be an optimal time to test the system, as we will have some visitors/tourists in our county, but will not be experiencing maximum numbers at that time.

As proposed, and if approved, the test would be conducted on Thursday September 26 at 2:00 PM Mountain Time, and would be targeted to San Miguel County. With September being National Preparedness Month, we felt this would be good timing to conduct this test. The text of the test will read as follows: San Miguel County EM: TEST message ONLY. No actions needed on your part. TEST only. If for some reason this date does not work our backup date for testing will be Friday September 27th at 2:00pm.

The most common threats to the public in Western Colorado are wildfires and flash floods. In the event of a wildfire, evacuations in many parts of San Miguel County would be necessary, and WEA would be a vital tool in getting the word out to as many citizens and guests as possible in a timely manner. The same is true of flash floods. Effective, efficient notification to the public is critical in these situations in order to provide them with the information they need. Additionally, we want citizens and visitors to be familiar with the format of the WEA messaging, and to become familiar with other County messaging systems. In the event of emergencies, our WEA, EAS, and other emergency messaging will direct citizens to [www.sanmiguelsheriff.org](http://www.sanmiguelsheriff.org) our social media feeds and the local radio station for more information.

In advance of this test, we will conduct considerable public outreach via the San Miguel County website (<https://www.sanmiguelcountyco.gov/>) and the social media outlets of many of our user agencies throughout San Miguel County. We will also run ads in our local newspapers, the local newspapers, as well as interviews with local radio stations. The public will also be notified that they may receive multiple messages. Information regarding the test will be pushed out to our neighboring PSAPs and Emergency Management Offices as well, and they are prepared with information should their citizens have questions about the test. We will also contact the Colorado Department of Transportation, and will request that they display information about the test on their overhead variable message signs on US Hwy 62 and Colorado Hwy 145, the primary and major routes through San Miguel County. In addition, our outreach will extend to the Colorado Department of Homeland Security and Emergency Management, wireless providers that serve our region, as well as schools and our local medical centers.

We intend to develop a short survey for citizens to fill out following the test, in order to capture data about location reach, cell carrier, handset operating system, and awareness in general about the test. We are happy to share the results of this survey with FEMA and the FCC.

We appreciate the opportunity to partner with the FCC and FEMA on this opportunity to test the WEA functionality in a mountainous environment. Thank you for your consideration!

Respectfully,

Henry Mitchell

San Miguel County Emergency Manager