



GOBIERNO DE PUERTO RICO

DEPARTAMENTO DE SEGURIDAD PÚBLICA

Negociado para el Manejo de Emergencias
y Administración de Desastres

Héctor M. Pesquera
Secretario

Carlos A. Acevedo Caballero
Comisionado

NMEAD-1-247-2018-mmm

August 30, 2018.

Ms. Marlene Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: Federal Communications Commission (FCC) Rule Waiver Request for Live
Puerto Rico EAS and WEA Test – PS Docket 15-91

Dear Secretary Dortch:

The Puerto Rico Emergency Management Bureau (PREMB) hereby requests a waiver of the Commission's rules on behalf of Commercial Mobile Service (CMS) Providers and Emergency Alert System (EAS) Participants to conduct a live-code WEA and EAS test on September 12, 2018, between 1100-1130 hours, and if necessary, a back-up date of September 13, 2018, between 1100-1130 hours.¹ Pending your approval, the live test will use a Civil Emergency Message (CEM) on EAS messages on radio, television and cable, and on mobile phones via the WEA in both Spanish and English. The WEA message will read: "PRUEBA DE SISTEMA DE ALERTA. NO TOME ACCION. WIRELESS EMERGENCY ALERT TEST. TAKE NO ACTION." The WEA message is 90 characters long. The test is not intended to be a substitute for other scheduled tests of the EAS or the monthly test of the WEA. If severe weather or a tropical system threatens the area within a day or two prior to the test, PREMB will consult with NOAA and FEMA to consider cancellation.

As you are aware, Puerto Rico was devastated by two major hurricanes in 2017. These hurricanes destroyed or severely damaged the island's communications. Puerto Rico has been rebuilding its communications infrastructure with the support of our federal, local and private-sector partners. As we enter the peak of hurricane season, it is important PREMB be able to test and validate its IPAWS origination capabilities and the participants' ability to disseminate emergency messages to the public. Accordingly, PREMB believes that it is imperative that it test the system now, rather than wait until May 2019 for the FCC's WEA end-to-end testing rules to become effective.

PREMB, FEMA, PR SECC, NOAA, the Caribbean Seismic Network, EAS and WEA participants have been working diligently on developing an effective, resilient and sustainable public warning capability for the Commonwealth of Puerto Rico. FEMA IPAWS has been training PREMB and the 911 Bureau, which manages all Public Safety Answering Points (PSAPs) in Puerto Rico on IPAWS message origination.

¹ A Participating CMS Provider is an FCC licensee providing commercial mobile service as defined in section 332(d)(1) of the Communications Act of 1934 that has voluntarily elected to transmit WEA Alert Messages under part 10 of the FCC's rules. See 47 CFR §10.10 (d), (f).



FEMA recently installed origination technologies at both bureaus to support the effort. These actions are undertaken to enhance public safety and assure that the residents of Puerto Rico have fast, actionable and credible information available to them in times of major emergencies. FEMA is also supporting the Commonwealth on the development of IPAWS-compatible siren systems.

All participants of been notified of the planned test. A robust and aggressive public outreach campaign will precede the test by no less than one week. This outreach effort is being conducted by the PREMB Public Information Officer (PIO) in coordination with FEMA ESF 15 and other Commonwealth of Puerto Rico PIOs, including police and fire departments, and other public safety agencies. The Puerto Rico PSAPs are informed and are intimately involved with the public warning efforts and this test. The information campaign will include a press conference, television, radio and print interviews, public service announcements and social media campaign. The outreach effort will also inform the public that a test will be conducted on the EAS and WEA and that no action is required. Additionally, messaging will include preparedness information and explain what the EAS and WEA can do to keep the public informed. The PREMB has also coordinated information about the test with the Participating CMS providers that operate within Puerto Rico and the EAS SECC.

The EAS and WEA test messages will be sent by the PREMB and will cover all of Puerto Rico utilizing the 072000 FIPS code. Although PREMB will not be conducting a formal survey, we will gather as many results as possible from industry participants and our social media outlets and will provide a detailed account of any problems that occur in the distribution of the EAS and WEA test to your office.

As Emergency Managers, we are tasked with alerting and warning our residents during emergencies and incidents that impact life, safety and property. The purpose of this test is to assess the readiness and effectiveness of our public warning system, plans and infrastructure and to raise public awareness about our alerting capability. Lessons-learned will support incremental improvement of IPAWS in Puerto Rico.

If you have any questions or need further information, please contact me at (787) 724-0124, extension 40075. I appreciate your consideration in this matter.

Sincerely,



Carlos Acevedo, Commissioner
Puerto Rico Emergency Management Bureau

Cc: Mr. Manny Centeno, Project Manager, NPWS, IPAWS
Mr. Alfonso Giménez, Chair, Puerto Rico SECC
Mr. Antwane Johnson, Director, IPAWS
Mr. Wade Witmer, Deputy Director, IPAWS
Mr. Mark Lucero, Chief, Engineering, IPAWS
Mrs. Sandra Torres, PRTRB
Mr. Ernesto Morales, NOAA, NWS

