



**Kim Robert Scovill, Esq.**  
**Vice President – Legal, Regulatory, and Industry Relations, Safety & Security Technologies**  
**Comtech Telecommunications Corp.**

Phone: 302-932-9697 Fax: 410-280-4903 kim.scovill@comtechtel.com

September 9, 2016

VIA ELECTRONIC SUBMISSION

*EX PARTE* COMMUNICATION

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: PS Docket 15-91 Wireless Emergency Alerts

Dear Ms. Dortch:

On Thursday, September 8, 2016, Dara Ung - Director of Systems Engineering, and Kim Robert Scovill, Esq., Vice President Legal and Regulatory, from Comtech Telecommunications Corp. (Comtech), and William Hutchinson McClendon IV, CEO of AC&C, LLC, hosted an online webinar attended by James Wiley of the Public Safety and Homeland Security Bureau of the Federal Communications Commission (FCC) to review a Comtech White Paper entitled “WEA Precise Geo-Targeting Using Hybrid Technology” (previously submitted as an ex parte filing in this docket).

The webinar included the PowerPoint slides attached to this filing. The slides explain how Comtech has developed a hybrid geo-targeting solution that uses both a network based geo-targeting algorithm (cell sector level accuracy) and a mobile device application (to determine its own location) to perform precise geo-targeting for WEA alerts. The parties noted that a handset-enhanced WEA process is both feasible, and can be implemented in relatively short order; the potential impact on carrier network WEA operations is minimal; and that a handset-enhanced WEA process will dramatically improve the usefulness of WEA from both the public safety and consumer perspectives.

Two additional items were mentioned during the webinar; a PowerPoint slide presentation describing Comtech’s test results for its proposed system, and a Department of Homeland Security (DHS) report on the topic. The Comtech presentation was provided post-meeting as was a web link (below) to the DHS report.. <https://www.dhs.gov/sites/default/files/publications/WEA-Final-Report-Geo-Targeting-Cell-Radio-RF-Field-Validation-042016.pdf> The presentation noted above is attached.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS with your office and a copy of this submission is being provided to all FCC employees mentioned herein.

Please direct any questions as to this matter to the undersigned. Thank you.

Sincerely,

/s/

Kim Robert Scovill, Esq.  
Vice President – Legal, Regulatory, and External Affairs

cc: James Wiley, PSHSB

**Eastern Office: 275 West St. – Suite 400 Annapolis, MD 21401**  
[www.comtechtel.com](http://www.comtechtel.com)