

Summary of quotes from Public Safety Comments

Filed for NPRM 15-91

Public Safety Supports Granular Geo-fencing Made Possible by Adding Device Based Hybrid Geo-targeting to WEA

Sarah Greenseid, **California Governor's Office of Emergency Services**: NPRM15-91 ID# 60001375907 "Cal OES strongly encourages the Commission to adopt rules that require mobile service providers to distribute WEA messages within the confines of the target area (geocode, circle or polygon) as specified by the alert originator." Such targeting is even essential given a number of the other proposals under consideration by the Commission and do not believe compliance with these rules should be voluntary; it should be required." "For WEA to be effective it is imperative that WEA messages be able to be geo-targeted."

"The FCC should consider expanding WEA alerts to include alerts that could be readable by mobile phone applications. Earthquake Early Warning's effectiveness could be enhanced if an alert were to be able to interact with a mobile phone's application, location and other variables to calculate an accurate warning time and magnitude for a pending earthquake."

Boulder Regional Emergency Telephone Service Authority: WEA15-91 ID# 60001375751 "WEA is also of limited utility to local public safety agencies because messages cannot be targeted to affected areas."

"...more narrowed geo-targeting of WEA messages would make the service more useful and avoid causing people to opt out of WEA and ENS,..."

Robert Forester, **San Francisco International Airport**: NPRM15-91 ID# 60001375686 "SFO supports geo-targeting of alerts to enable imminent alerts to specific locations on the airport campus such as an active shooter event in a particular terminal or on its campus."

City of Los Angeles-Emergency Management Department: NPRM 15-91 ID# 60001375678

Proposal to require Participating Commercial Mobile Service Providers to distribute WEA messages to a geographic area that more accurately matches the target area specified by the originator

o The City of Los Angeles AGREES with this proposal. Any improvement to the geo-targeting capabilities of the system is beneficial.

Doug Blackwell- **Pinellas County Emergency Management** :NPRM 15-91 ID# 60001375657 Yes, Most emergencies often do not affect an entire county. By accurately geo-coding a specific area the message would provide specific and timely information to the correct target audience that is affected

National Public Safety Telecommunications Council: NPRM 15-91 ID# 60001375610 NPSTC supports improved “Geo-Targeting” of wireless emergency alerts so that members of the public receiving an alert are those potentially affected by the emergency

NPSTC believes the capability for accurate Geo-Targeting to match the area affected or potentially affected by a given emergency is important

NPSTC supports the Commission’s proposal to require the capability for more granular alerting.

R. Scott Swearingin-**City of Austin HS and EM:** NPRM15-91 ID# 60001375566: Of all the issues in this NPRM, the issue of geo-targeting deserves the most careful attention by the Commission.... “Being able to target messages to an area near a specific waterway is critical if WEAs are to be used for alerting.

US Geological Survey: NPRM15-91 ID# 60001375544 We strongly support enhanced geo-targeting. The Common Alert Protocol (CAP) message format used by IPAWS can define an affected region using circles, polygons, or SAME/FIPS regions. WEA should fully support all of these approaches....

More precise geo-targeting will reduce “over alerting” which undermines public confidence in the system. We also support pursuing geo-targeting using network-based, device-based, and third-party-assisted solutions. “Smart” devices are now ubiquitous and it is irresponsible not to harness their capabilities to refine and customize alerts.

APCO International: NPRM 15-91 ID# 60001375501 “APCO understands that the ability to geo-target wireless messages can be affected by network topology, geography, and radiofrequency behavior. But to be as clear as possible, geotargeting saves lives. Accordingly, APCO encourages the wireless industry to apply available wireless network and device technologies to target messages as precisely as possible.

A Chapman, **Nevada Office of Emergency Management:** NPRM 15-91 ID# 60001375441 “CCOEM supports improvements to WEA geo-targeting of alerts, specifically to minimize problems of bleed-over”

NOAA/National Weather Service: NPRM-15-91 ID# 60001375449 NOAA believes that the granularity of geo-targeting should be improved. For example, the device could attempt to determine if it is inside the actual threat area before rendering the alert.

Dennis J. Storemski, **City of Houston Mayor Office of Public Safety and Homeland Security:** NPRM 15-91 ID# 60001375396 The FCC should require carriers to use integrated the Global Positioning System (GPS) capability in most new phones to allow for a greater pin-pointing of geo-targeted warnings. The nature of cell broadcast allows for a great amount of over-warning, however if warnings could be tailored so that a device is able to choose to display a warning, or not do so, based on the combination of the warning polygon and the devices GPS coordinates, it may allow for more targeted warning. In situations such as hazardous chemical releases, where protective actions are differentiated based on proximity and direction of the hazard, this could ensure that the right message reaches the right person, at the right time.

Robert Daughdril, **Calcasieu Parish, La:** NPRM15-91 ID# 60001375375 Accurate, fewer and most appropriate targeting alerts would speed up the notification and aid in the execution of the actions to be taken. If we focus on a limited geotargeted message could mean the difference in thousands of people who did not need to take action getting in the way of those who need to take action

NY City Emergency Management Dept. NPRM 15-91 ID# 60001366324 NYCEM strongly encourages the Commission to adopt rules that require mobile service providers to distribute WEA messages within the confines of the target area (geocode, circle, or polygon) as specified by the alert originator. Such targeting is even more essential given a number of the other proposals under consideration by the Commission and do not believe compliance with this rule should be voluntary; it should be required.

Gil Zavlodaver, **Ventura County Sheriff,** EOC: NPRM15-91 ID# 60001361375 This is one major problem with the current configuration of WEA and a reason why alerting authorities are hesitant to use WEA. It is important to be able to send targeted messages to the public using polygon level messaging. It is very rare to have an emergency impacting an entire county. It can create unnecessary panic and fear when alerting the public that are not directly impacted by an emergency. Additionally, at the county level, there is significant bleed-over to other counties which are not being impacted either.

All emergency notifications systems utilize geo-targeting based software. All alerts are sent by identifying notifications perimeters. Almost all emergencies impact a certain street, neighborhood/community or city(ies). It is very rare to have an emergency impact an entire county (i.e. earthquake). The benefits of geotargeted

messages are providing accurate, timely and actionable messaging to residents directly impacted from an incident that will ultimately save lives. Over alerting, alert fatigue and bleed-over can be very harmful to the public. Unnecessary actions may be taken that negatively impact the public and can negatively impact the response and recovery to an incident.

Kimerly Prosser, **Brevard County, FL Emergency Management:** NPRM 15-91 ID# 60001359879 Yes! Accurate GEO-Coding is vital to reducing residents becoming desensitized to emergency information.

The increase in geo-coding measures gives emergency managers the ability to only inform those residents affected and in turn reduce citizens potentially becoming desensitized. The accuracy of geo-coding could be used to target those individuals who approach a beach on a day where rip currents are severely dangerous. This small, yet informative information message could lower the risk for rip-current related deaths.

...The ability to show a map of traffic congestion or the area of a boil water zone could drastically improve resident familiarity and adherence to the emergency management community.

Robert Greene-**Jefferson Parish EM:** NPRM 15-91 ID# 60001326191 having the ability to pin point one certain area would be a great benefit to reducing the alert fatigue, bleed-over, etc.

Ward Phillips **Fort Riley EM:** NPRM 15-91 ID# 60001326191 ANS: Absolutely, positively YES!!! Polygon targeting is critical for non-county IPAWs alerting users. We are a military Installation of over 100,000 acres that spans 2 counties and shares a boundary with a 3rd. We need the polygon capability to target the population of our installation at any given time. Sending an IPAWs message regarding our installation to the entirety of 3 counties is overkill and would create confusion that negatively impacts their EM and first responder services.

I believe that Universities and other large footprint facilities (educational, industrial, military, etc) would benefit from this capability.

Art Botterell: Original Designer of CAP: NPRM 15-91 ID# 60001323508 “This brings us to the question of “device-based solutions.” By providing the actual bounds of the CAP alert area to a location-aware end of device, we could make it possible for modern “location aware” smartphones to determine not only whether that device is in the target area, but also if any user-designated location of interest is affected. At a stroke we remove many of the complexities and costs of limiting transmission precisely by

selecting cell sites or sectors.

This leveraging of smartphones and other location-aware receiving devices was a key use-case in the design of the Common Alerting Protocol. While it is not the only way of approaching geo-targeting in WEA, it still has much to recommend it.

Francisco Sanchez: **Harris County HS and EM: NPRM 15-91 ID# 60001029636**
Emergencies are relative to the size, complexity, and experience of each entity. What qualifies as a disaster in a community of 50 may be commonplace in a community of 4.35 million. This argument highlights the need to fully develop WEA geo-targeting capability. Even in a one voice environment, it is irresponsible to alert populations not in danger when extant technology allows for narrow, targeted communication. The effectiveness of all emergency communication is immediately eroded if the public perceives authorities are crying wolf.