



**Seattle**  
**Office of Emergency**  
**Management**

*DISASTER READY...  
PREPARED PEOPLE,  
RESILIENT COMMUNITIES*

September 22, 2016

Tom Wheeler, Chairman  
Federal Communications Commission  
425 12<sup>th</sup> Street SW  
Washington, D.C. 20554

[Submitted via FCC Electronic Comments Filing System]

Re: NOTICE OF EX PARTE PS Docket 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting

Dear Mr. Wheeler,

The City of Seattle supports proposed changes to the Wireless Emergency Alert (WEA) system to the following:

1. Enable alerting to smaller areas;
2. Allow longer messages;
3. Allow alerts to contain embedded pictures, phone numbers and clickable links;
4. Enable phones to show where the message recipient is in relation to a hazard area (i.e., device-assisted geotargeting);
5. Send messages in multiple languages; and
6. Allow for comments back from recipients (i.e., "Many-to-One" capability)

**Alerts to smaller areas:** Enabling more precise alerting is the single most important action the FCC can take to make WEA relevant for first responders in the City of Seattle. Currently, the smallest guaranteed delivery area is the county and consequently that is the smallest area to which an alert safely can be made. Seattle is 83 square miles while its surrounding county, King County, is 2,307 square miles. The City of Seattle doesn't use WEA because it doesn't want to issue alerts to the 96% of King County that is not the City of Seattle. The lack of precise targeting makes WEA useless for Seattle in all but the largest events.

**Allow longer messages:** Seattle supports the proposal to increase message length from 90 to 360 characters. As the recent New York City WEA alerts demonstrated, it is very difficult in 90 characters to provide accurate and precise information that recipients will interpret correctly and use. The DHS sponsored report, Comprehensive Testing of Imminent Threat Public Messages for Mobile Devices, came to the same conclusion.

**Allow alerts to contain embedded pictures, phone numbers and clickable links:** Through the use of Twitter, Instagram and other short form social media, the public now expects multimedia

messages with clickable links in short messages. The message is essentially a headline drawing attention to an article containing more information. This expectation is not merely preference. Recipients are more likely to take action on a message that makes it easier for them to get more information.

**Device-assisted geotargeting:** Seattle's experience and the Comprehensive Testing report agree that showing a message recipient's location on a map along with a hazard area greatly increases the likelihood that the recipient will take action. Transmitting a hazard area in the form of a circle or polygon and then using a smartphone's onboard mapping and GPS capabilities would greatly boost accurate message interpretation by recipients, motivate those in the hazard area to take action and in the case of alert 'spill-over' let those outside a hazard area know that they are not in immediate danger.

**Send messages in multiple languages:** 10% of Seattle's population speaks English 'less than well' according to the 2010 Census and in some Census tracts the percentage approaches 60% with many over 25%. These people are at heightened risk from disaster impacts because of the language barrier and because they are more likely to fall into other vulnerability categories. They are the people whom the City of Seattle most wants to reach and currently we do not have the means to do so with WEA.

**Many-to-One capability:** Seattle recently participated in the Cascadia Rising Exercise simulating a Cascadia Subduction Zone earthquake. Seattle focused on collected damage assessment information. It discovered that its staff is simply too small to rapidly assess damage in a large incident. Enabling the public to provide information back to us would help first responders to gain situational awareness much earlier in an incident.

Following a large incident, Seattle's assumption is that cellular networks would become congested. Wireless Emergency Alerts are a powerful tool that mitigate the effects of congestion. Many commercial mobile service providers have expressed concern that many of the proposed rules will make congestion worse as recipient click embedded links or make calls. The City of Seattle's view is that we already know that cellular congestion will be a problem. The proposed rule changes will not make the problem worse because the public will be on their mobile devices anyway. The rule changes will, however, greatly increase the likelihood that people will receive accurate, actionable information from trusted sources when they make a connection.

The City of Seattle hopes the FCC will adopt these rules and give it a powerful tool it can use to make the public it serves safer.

Sincerely,



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