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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Wireless Emergency Alerts
PS Docket No. 15-91**

Dear Ms. Dortch:

On September 20, 2017, Lawrence Rybar, Xiaomei Wang and I of Verizon met via teleconference with the following staff of the Commission's Public Safety and Homeland Security Bureau: James Wiley, Megan Henry, Linda Nagel, Rasoul Safavian, and Briannie Kraft. The attendees discussed staff's questions on issues relating to geo-targeting/geo-fencing of wireless emergency alerts (WEAs) raised in the Commission's *Further Notice of Proposed Rulemaking* in the above-referenced proceeding.

Verizon supported the recommendations of the CSRIC V Working Group 3 (WG-3), which included a minimum 42-month timetable to implement a device-based geo-targeting/geo-fencing method for WEAs.¹ It may be feasible to expedite this process; for example, industry is in the early stages of developing technical standards to support such solutions. But whether it is feasible to significantly expedite the 42-month period described in the *WG-3 Report* depends on a number of factors, including:

- *Accuracy Requirements.* Implementation timetables depend on the technical capability required, and WG-3 participants were unable to reach consensus on an appropriate accuracy threshold. Public safety participants called for 100 percent of the Alert Originator's selected polygon with less than 0.10 mile overshoot, but that precision may not be possible.² As AT&T explained, device-level geo-targeting

¹ See CSRIC V, Working Group 3, *Wireless Emergency Alerts – Recommendations to Improve Geo-Targeting and Offer Many-to-One Capabilities, Final Report & Recommendations*, at 15-16 (Sept. 2016) ("WG-3 Report"). Verizon's discussion concerning the limitations and potential impacts of device-level solutions were consistent with its earlier filings. See Comments of Verizon, PS Docket No. 15-91 (Dec. 8, 2016); Comments of Verizon, PS Docket No. 15-91 (Jan. 14, 2016); Verizon *Ex Parte* Letter, PS Docket No. 15-91 (Aug. 1, 2017).

² See *WG-3 Report* at 14-20.

“can[not] be done with mathematical precision” as “[i]ssues of coverage, signal strength, environmental shading, and other matters can prevent the message from being received by ‘100%’ of the devices in the alert polygon.”³ Those same factors would cause some devices well outside the polygon to receive alerts, particularly if the solution is dependent on the consumer’s affirmative decision to maintain the device’s precise location function “on” at all times. Finally, the new capability cannot be imposed on existing handsets on a flash cut basis and it will take years for handsets without the necessary capability to work their way out of the ecosystem.

- *Other Players.* Timetables also depend on device manufacturers’ and operating system (OS) providers’ ability and willingness to incorporate any new geo-fencing capabilities. And the ubiquity of geo-targeting enabled devices will depend on consumers themselves. An over-the-air upgrade will not be available for all handsets, so it will take years for consumers to replace the embedded base of handsets – a factor *not* accounted for in the 42-month period of the *WG-3 Report*.

To address these challenges, ATIS recommended in the *WG-3 Report* that WEA stakeholders engage in a cooperative, voluntary framework to move forward on improved WEA geo-targeting.⁴ Such a multi-stakeholder effort could still expedite the commercial availability of solutions by convening subject matter experts in a task force to develop: (1) a feasible solution that both enables Commercial Mobile Service providers to deliver WEAs effectively while addressing the goals of Alert Originators; and (2) a reasonable timetable for implementing such a solution.

This letter is submitted in accordance with Section 1.1206(b) of the Commission’s rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned if there are questions concerning this filing.

Sincerely,



³ See AT&T Comments, PS Docket No. 15-9, at 19 (Dec. 8, 2016).

⁴ See *WG-3 Report* at 16.