



September 23, 2016

**VIA ELECTRONIC FILING**

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

**Re: Ex Parte Presentation, *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91.**

Dear Ms. Dortch,

On Thursday, September 22, 2016, Scott Bergmann and the undersigned had a telephone conference with Jessica Almond, Legal Advisor to Chairman Wheeler, concerning the above captioned proceeding. The parties discussed the efficacy of requiring the use of embedded URLs across the Wireless Emergency Alert ("WEA") system. CTIA and its member companies have for several years strongly supported the development, use, and evolution of the WEA service and seeks to enhance and supplement the service. However, the hallmark of WEA has been the voluntary nature of the service that accounts for the unique aspects of cell broadcast technology, which was specifically developed to enable clear and succinct mass notifications to protect wireless subscribers while minimizing congestion and adverse impacts to wireless providers' networks. CTIA encourages the Commission to continue a collaborative approach that allows the wireless industry to enhance and upgrade the WEA service without mandated outcomes that could lead to consumer confusion and wireless network congestion.

Before considering use of embedded URLs across all WEA alert categories that provide access to additional content outside of the WEA service, a substantial effort among all stakeholders would be needed to develop and implement standards, agree on approaches to mitigate customer confusion and safeguard against adverse impacts to wireless networks. It would require alert originators to use low-bandwidth URLs enabled for wireless access protocol with adequate provisioning and security protections so that citizens may safely access the URLs (whether directly or indirectly) to



get to images or photos of missing children or suspects while mitigating the risk of blocking. Enabling liberal use of URLs by alert originators will also increase data usage beyond the network traffic “spikes” that already occur in the wake of these events and in response to these alerts. Indeed, the failure of the Commission to adequately account for these considerations could ultimately harm public safety and consumers by hindering access to information at the times most critical for ensuring access to wireless networks. Thus, alert originators’ use of this feature would require consistent, objective gating criteria to ensure they are used efficiently and effectively – not only for wireless providers’ networks, but for alert originators’ own website capabilities.

Industry standards with a development process likely well in excess of one year would be necessary to enable consumers to access the URL directly. The Commission should carefully consider and address the issue of how adding URLs would impact compatibility with legacy devices, as it is infeasible for the embedded base of handsets to provide direct access to the URL. Participating wireless providers transmit only the single WEA message generated by the alert originator and consumers could become confused or frustrated if they can see a URL but cannot “click” on it and access the content. Only smartphones (not feature phones) offered in the marketplace after the necessary standards, handset and network capabilities (involving handset manufacturers and OS providers) are completed could have that capability. Therefore, the Commission should take proactive steps, through a Consumer Advisory and other efforts, to inform and educate alert originators and wireless consumers of the effects of this more expansive approach to embedded references.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Brian M. Josef

Assistant Vice President – Regulatory Affairs

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