September 27, 2017

VIA ELECTRONIC SUBMISSION

Marlene H, Dortch

Secretary

Federal Communications Commission

445 12th Street S.W.

Washington, D.C. 20554

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

Ms. Dortch:

On September 26, 2017, I spoke via teleconference with James Wiley, Linda Nagel and other staff of the Federal Communications Commission’s (“FCC”) Public Safety and Homeland Security Bureau, at their request, to provide comment on several items regarding the Wireless Emergency Alerts proceeding.

Nex-Tech Wireless first explained that regional carriers require more time to implement industry standards, particularly after development and regression testing, than the FCC’s 2016 WEA Report & Order requires.[[1]](#footnote-1) Specifically, network features and enhancements often are not commercially available to regional providers until after Tier I providers implement said features. Product cycles for rural and regional carriers run approximately twelve-months behind the larger carriers’ as a result of commercial availability lag, and internal development resources and budget cycles.

Nex-Tech Wireless also discussed the enhanced 360-character length requirement and the Spanish language requirement, as adopted in the FCC’s 2016 WEA Report & Order.[[2]](#footnote-2) Nex-Tech Wireless noted that it would be beneficial to require concurrent deadlines for these two features as they are closely interrelated and will touch many of the same network systems. Further, concurrently implementing these requirements will lower development costs. At the same time, however, Nex-Tech Wireless cautioned that requiring concurrent implementation of unrelated features such as enhanced geotargeting capabilities and embedded references will likely require additional costs and extended deployment timelines.

Respectfully Submitted

Nathan Sutter,

Director of Network Operations and Engineering

1. *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, Report and Order and Further Notice of Proposed Rulemaking, PS Docket No. 15-91, et al., FCC 16-127 (Sept. 29, 2016) (“WEA Report and Order”). [↑](#footnote-ref-1)
2. *See id*. [↑](#footnote-ref-2)