



**EXECUTIVE DIRECTOR
CHIEF EXECUTIVE OFFICER**

Derek K. Poarch
poarchd@apointl.org

HEADQUARTERS

J. Rhett McMillian, Jr. Building
351 North Williamson Boulevard
Daytona Beach, FL 32114-1112
386-322-2500

EXECUTIVE OFFICES

Gregory T. Riddle Building
1426 Prince Street
Alexandria, VA 22314
571-312-4400

www.apointl.org

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mcarter@caddo911.com

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holly.wayt@westerville.org

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hilburn911@bellsouth.net

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cgreathouse@gpstc.org

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September 29, 2017

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

Re: PS Docket No. 15-91

Dear Ms. Dortch,

On September 27, Mark Reddish and I met with representatives of Chairman Pai's office and the Public Safety and Homeland Security Bureau, as well as CTIA and the Competitive Carriers Association (CCA), to discuss the FCC's 2016 Wireless Emergency Alerts (WEA) Report & Order.¹ Specifically, we discussed requests from CTIA and CCA to delay the November 1, 2017, requirement to include embedded URLs and phone numbers in WEA messages.²

As APCO previously noted, and as further confirmed during this meeting, the wireless carriers have not presented new facts or circumstances, or otherwise provided evidence that including embedded URLs and phone numbers for WEA messages would be infeasible by the November 1 deadline.³ Moreover, the carriers have not explained what reasonable efforts they have taken to implement these features in the year since the rules were adopted.

The general public and the public safety community have come to depend upon WEA as an official source of life-saving alerts. The popularity and ubiquitous nature of mobile devices and services make WEA essential to managing a variety of emergencies, including major disasters such as the recent hurricanes affecting the United States. Further, the benefits of enhancing WEA with clickable URLs and phone numbers are clear.

Finally, APCO would be very concerned if any wireless carrier opted to cease providing its customers with emergency alerts and declined to serve as a partner in this trusted and official public safety alerting system.

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 (rel. Sept. 29, 2016).

² CTIA Petition for Reconsideration, Docket No. 15-91 (filed Dec. 1, 2016); CCA Petition for Waiver, or in the Alternative, Extension of Time, Docket No. 15-91 (filed Aug. 16, 2017).

³ APCO Opposition to CTIA's Petition for Reconsideration, Docket No. 15-91 (filed Jan. 3, 2017).

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,

/s/
Jeffrey S. Cohen
Chief Counsel

CC (via email):
Matthew Berry
Zenji Nakazawa
Michael Carowitz
Lisa Fowlkes
Nicole McGinnis
Megan Henry
Renee Roland
Scott Bergmann
Matthew Gerst
Rebecca Thompson
Courtney Neville