



November 17, 2017

**VIA ELECTRONIC FILING**

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

Re: Notice of Ex Parte Presentation  
PS Docket No. 15-94

Dear Ms. Dortch:

On November 15 and 16, 2017, the undersigned representatives of T-Mobile USA, Inc.<sup>1</sup> (“T-Mobile”) met via conference call with Nicole McGinnis and Gregory Cooke of the Public Safety and Homeland Security Bureau (“PSHSB”) to discuss the development of a federal Blue Alert<sup>2</sup> regime and incorporating Blue Alerts into the Wireless Emergency Alert (“WEA”) system. The substance of these conversations is summarized below.

T-Mobile representatives explained that adding a new Blue Alert code into the existing standards-based process requires changes to the standard and corresponding network and device changes and testing. Changes must be made by wireless carriers participating in WEA, as well as by the Federal Emergency Management Agency. For example, changes must be made to the C-Interface and the J-standard before Blue Alerts can be delivered. T-Mobile anticipates that the changes necessary to support delivery of Blue Alerts using the event code “BLU” can be implemented in approximately eighteen (18) months.<sup>3</sup>

This timeframe assumes that any Blue Alert rules will use existing WEA alert handset behavior qualities rather than requiring new, special functions (*e.g.*, unique audio notifications or

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<sup>1</sup> T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

<sup>2</sup> *Amendment of Part 11 of the Commission’s Rules Regarding Emergency Alert System*, Notice of Proposed Rulemaking, 32 FCC Rcd 5280, 5281-82 (2017) (“*NPRM*”) (defining Blue Alerts as those meant to “disseminate information when a law enforcement officer is seriously injured or killed in the line of duty, is missing in connection with the officer’s official duties, or an imminent and credible threat that an individual intends to cause the serious injury or death of a law enforcement officer is received, and for other purposes”).

<sup>3</sup> As ATIS has previously noted, it is difficult to evaluate the technical feasibility of additional WEA modifications while recently mandated changes are still being implemented and evaluated. *See* ATIS Comments, PS Docket No. 15-91, at 3-4 (Jan. 13, 2016).

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special cadence).<sup>4</sup> Any new features or functions on handsets would require additional standards work and lead to slower deployment, which would be concerning, particularly as the industry actively works to move forward with implementation of recently required changes stemming from the FCC's *2016 WEA Report and Order*.<sup>5</sup>

Moreover, if the Commission moves forward with Blue Alerts, it should establish an alert originator training and certification process. This would ensure the parties issuing the alerts not only have clear guidance, but also have the proper training to encourage appropriate use of the system.<sup>6</sup>

If you have any questions, please contact the undersigned.

Respectfully submitted,

Steve Sharkey  
Vice President, Technology and Engineering Policy

Shellie Blakeney  
Principal Corporate Counsel, Federal Regulatory Affairs

cc: Nicole McGinnis  
Gregory Cooke

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<sup>4</sup> *Accord* T-Mobile Reply Comments, PS Docket No. 15-94, at 3 (Aug. 29, 2017).

<sup>5</sup> *See generally* *Wireless Emergency Alerts, Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 11112 (2016) ("*2016 WEA Report and Order*").

<sup>6</sup> *See, e.g.*, T-Mobile Reply Comments at 3; CTIA Reply Comments, PS Docket No. 15-94, at 5-6 (Aug. 29, 2017).