



November 21, 2018

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

[Submitted via FCC Electronic Comments Filing System]

Re: NOTICE OF EX PARTE PS Dockets 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting and 15-94 Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System

Dear Secretary Dortch:

On November 20, 2018, representatives of the New York City Emergency Management Department ("NYCEM") participated in an *Ex Parte* meeting on the above referenced matters with representatives of the Federal Communication Commission's ("FCC") Public Safety and Homeland Security Bureau ("Commission").¹ During the meeting, NYCEM reviewed and discussed the results of a survey conducted following the 2018 National Wireless Emergency Alert (WEA) test. While 81.4 percent of survey respondents reported receiving the WEA message, NYCEM is concerned that 77 percent of respondents who did not receive the WEA message lacked an identifiable explanation for non-delivery.

A copy of our presentation, associated maps, and survey questions are attached. Based upon the survey data, NYCEM recommends the following to the Commission:

- Investigate inconsistent WEA delivery.
- Change the name "Presidential Alert" to "National Emergency Alert."
- Work with the Federal Emergency Management Agency ("FEMA") to complete the necessary regulatory requirements to conduct a national survey following the next test (a link to the survey could be included directly in the WEA message).
- Require alerts to be continually broadcast for a pre-determined duration to allow individuals to receive the WEA if they did not have connectivity during the initial broadcast.
- Investigate reports of "Do Not Disturb" and "Vibration" settings not being overridden by the WEA alert.

As WEA is a mission-critical system, NYCEM strongly urges the Commission to work swiftly with commercial mobile service providers to identify and correct technical issues that impede WEA delivery. NYCEM sincerely appreciates the Commission's ongoing efforts to improve WEA and looks forward to

¹ **NYCEM Participants** – Benjamin J. Krakauer, Assistant Commissioner for Strategy and Program Development; Stella Guarna, Esq., Deputy Commissioner for Legal Affairs; Sonja Orgias, Esq., Director of Legal Affairs; Lauren Mahon, Project Manager **FCC Participants** – Nicole McGinnis, Gregory Cooke, Elizabeth Cuttner, Rochelle Cohen





continuing to work with the Commission in crafting and implementing the regulatory changes necessary to enhance this critical system. Further communication on this matter may be directed to the undersigned.

Respectfully submitted,

/s/

Benjamin J. Krakauer, MPA
Assistant Commissioner, Strategy & Program Development

Enclosures

A wide-angle, nighttime photograph of the New York City skyline. The image shows numerous skyscrapers with their lights on, reflecting in the water. The Brooklyn Bridge is visible on the right side, with its lights and structure clearly seen. The sky is dark with some clouds. The overall scene is a vibrant, illuminated cityscape.

Wireless Emergency Alert (WEA) Survey Results

New York City Emergency Management (NYCEM)

Agenda

- Overview
- Survey Description
- Overall Delivery Statistics
- Non-Delivery Explanation Results
- Non-Delivery Mobile Service Provider Information
- Mapped Survey Results
- General Feedback
- Findings

Overview

- First-ever National Wireless Emergency Alert (WEA) System test was conducted on October 3, 2018 at 2:18PM EST
- NYCEM surveyed recipients to:
 - › Evaluate message delivery
 - › Identify, to the extent possible, gaps in WEA coverage
- Survey was advertised through Notify NYC, social media, and partner engagement
- In total, NYCEM received **2,351 responses** to the survey from across the nation (1,705 responses from NYC)

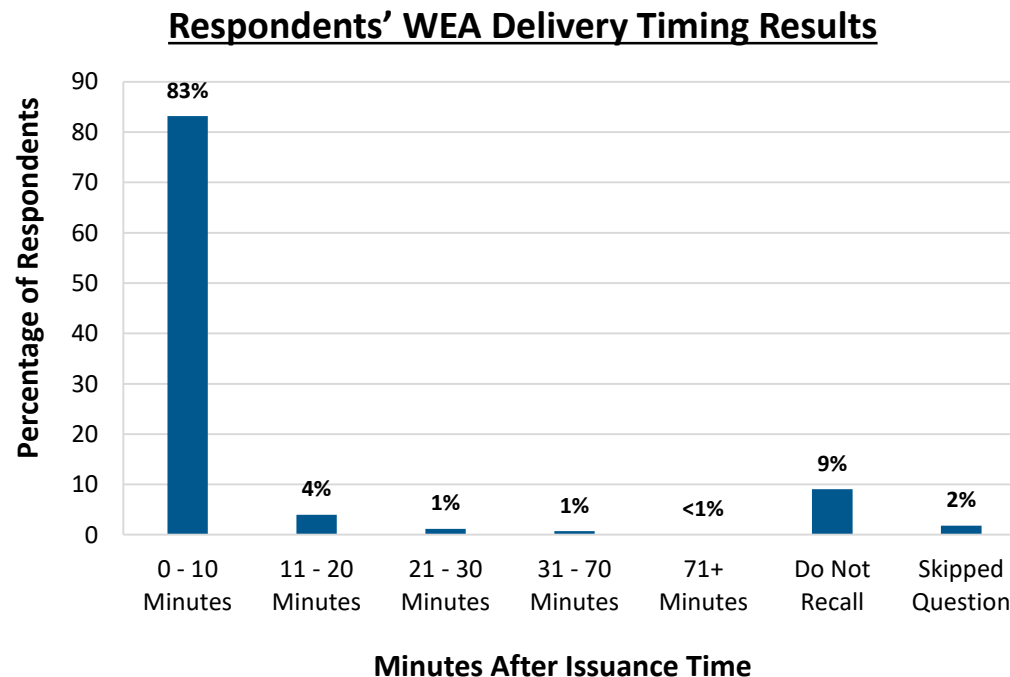


Survey Description

- Included 14 questions asking the respondent:
 - › Did you receive the WEA message?
 - › What time did you receive it?
 - › Where were you when you received it?
 - › Did it read the correct message?
 - › Did your phone make a loud noise and vibrate?
 - › Who is your mobile service provider?
 - › Select your mobile phone manufacturer?
 - › Enter your mobile phone model?
 - › Any additional feedback?

Overall Delivery Statistics

- 81.4 percent of respondents reported receiving the WEA message
 - › 17.3 percent of respondent did **not** receive the WEA message
 - › 1.3 percent of respondents were unsure if they received the WEA and/or skipped the question
- For those who reported receiving the WEA message:



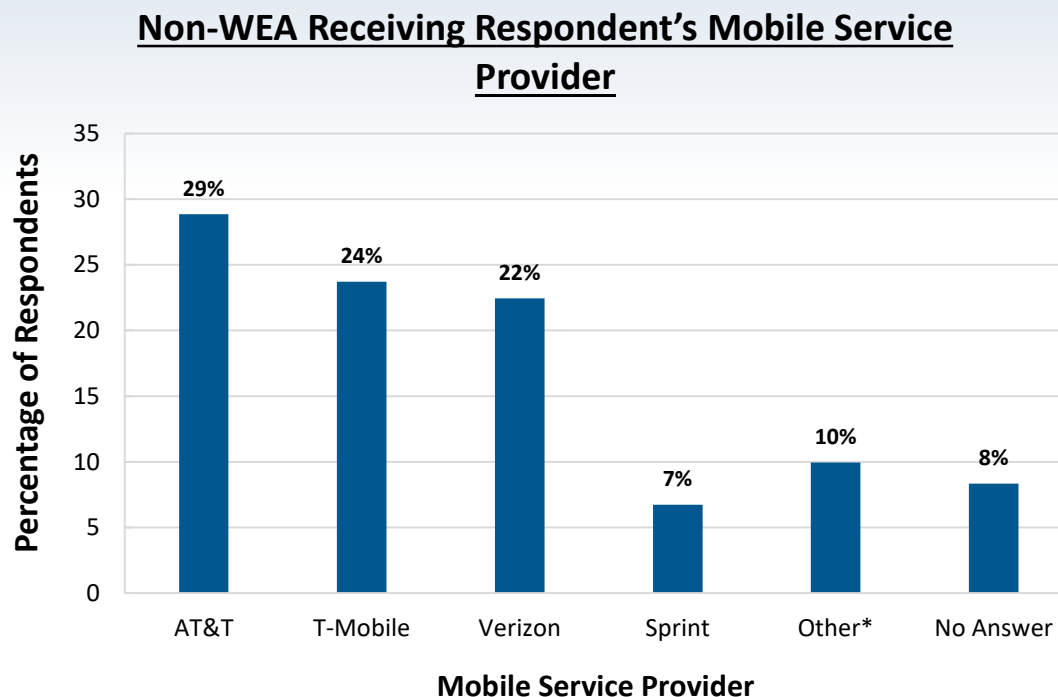
Non-Delivery Explanation Results

- For the 17.3 percent of respondents that did **not** receive a WEA message:

Explanation	Percentage of Respondents
No Known Reason	77%
Spotty Service	7%
Mobile Phone Turned Off	5%
Skipped Question	3%
Using the Phone for Voice Call	3%
On Subway	2%
Phone on 'Do Not Disturb'	1%
Phone in Airplane Mode	1%
Streaming on Phone	1%

Non-Delivery Mobile Service Provider Information

- The mobile service provider breakdown for respondents that did not receive a WEA message for “no known reason” is provided below:



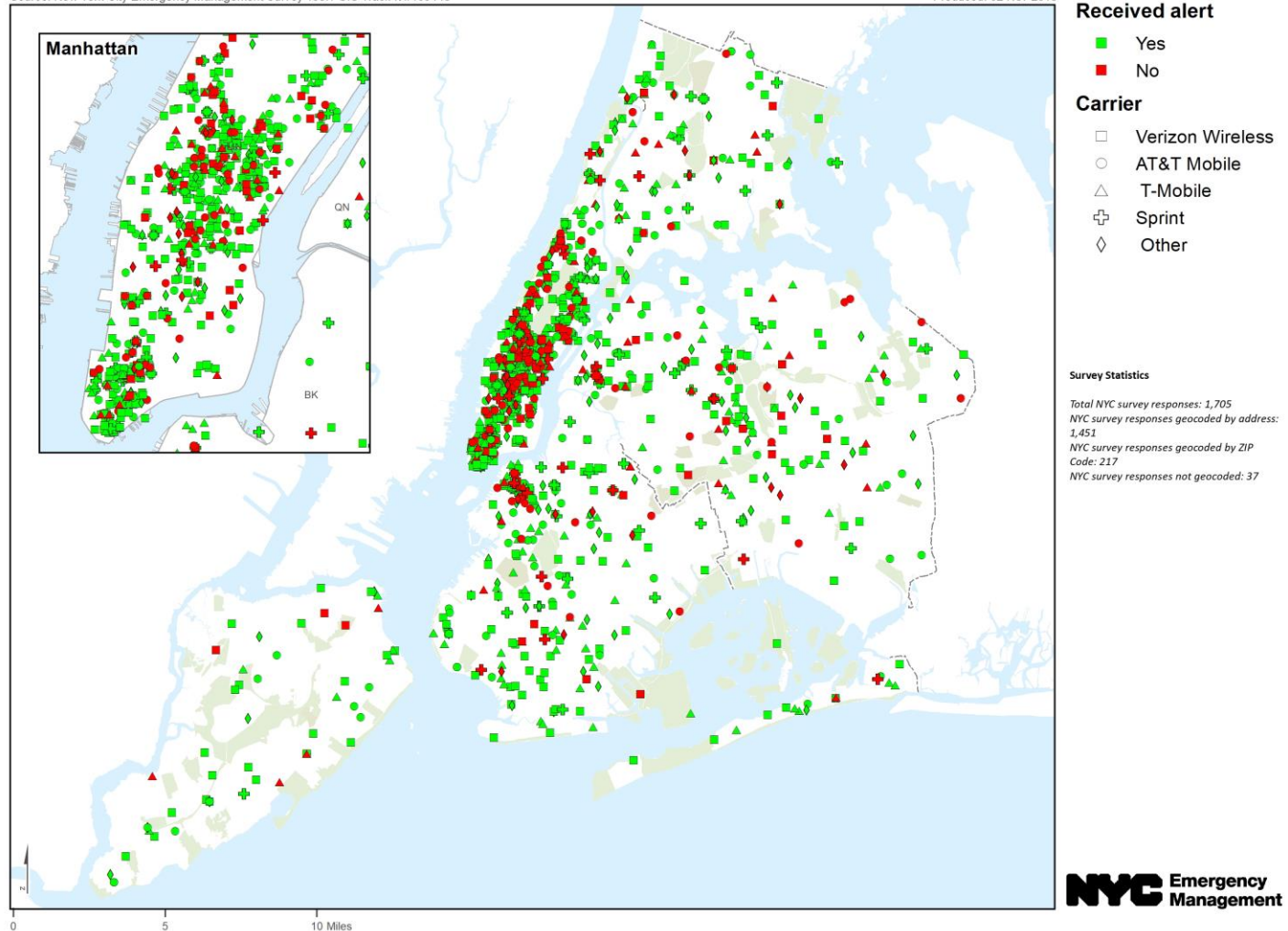
**“Other” mobile service providers includes: Project Fi, TracFone, Boost Mobile, MetroPCS, Virgin Mobile, CREDO Mobile, Cricket, Freedom Pop, Net10, Simple Mobile, Tell, Ting, and Other*

WEA Delivery Survey Results - Mapped

National Wireless Emergency Alert System 10/3/18 Test – Survey Results

Source: New York City Emergency Management Survey Tool / GIS Track-It #109443

Produced: 02 Nov 2018



FCC Recommendations

- Based on the feedback collected in the survey, NYCEM recommends the FCC:
 - › Investigate inconsistent WEA delivery
 - › Change the name of these alerts from “Presidential” to “FEMA” or “Nationwide Emergency Alert”
 - › Work with FEMA to complete necessary regulatory requirements to conduct a national survey following the next test
 - › Require alerts to be re-broadcasted for a pre-determined duration to individuals who did not immediately receive the alert
 - › Investigate reports that “Do Not Disturb” and “Vibration” settings were **not** overridden by the WEA alert

Thank You!

For additional information or questions, please email:

- **Ben Krakauer**, Assistant Commissioner of Strategy and Program Development, bkrakauer@oem.nyc.gov
- **Becca Baudendistel**, Deputy Program Manager of Notify NYC
rbaudendistel@oem.nyc.gov



NYC Emergency Management Survey Questions*

National Wireless Emergency Alert Test

1. Did you receive the test WEA message?
2. Approximately when did you receive the message?
3. Where were you (approximately) at the time you received the message?
4. You indicated that you received the message more than 30 minutes after it was sent. Please select any of the following that apply to your mobile phone between 2:18 PM – 2:48 PM.
5. Please select any of the following that apply to your mobile phone between 2:18 PM – 2:48 PM today:
6. Where were you (approximately) between 2:18 PM – 2:48 PM today?
7. Did the message on your phone read, “THIS IS A TEST of the National Wireless Emergency Alert System. No action is needed.”?
8. When you received the message did your phone vibrate and make a loud noise (similar to when you hear emergency alert messages on television)?
9. Was your phone in vibrate-only or silent mode?
10. Where were you (approximately) at 2:18 PM, when the message was sent?
11. Who is your mobile service provider?
12. Select your mobile phone manufacturer:
13. Enter your mobile phone model (iPhone X, iPhone 7, Galaxy S8, etc.):
14. Please feel free to provide any additional feedback on the National Wireless Emergency Alert test here:

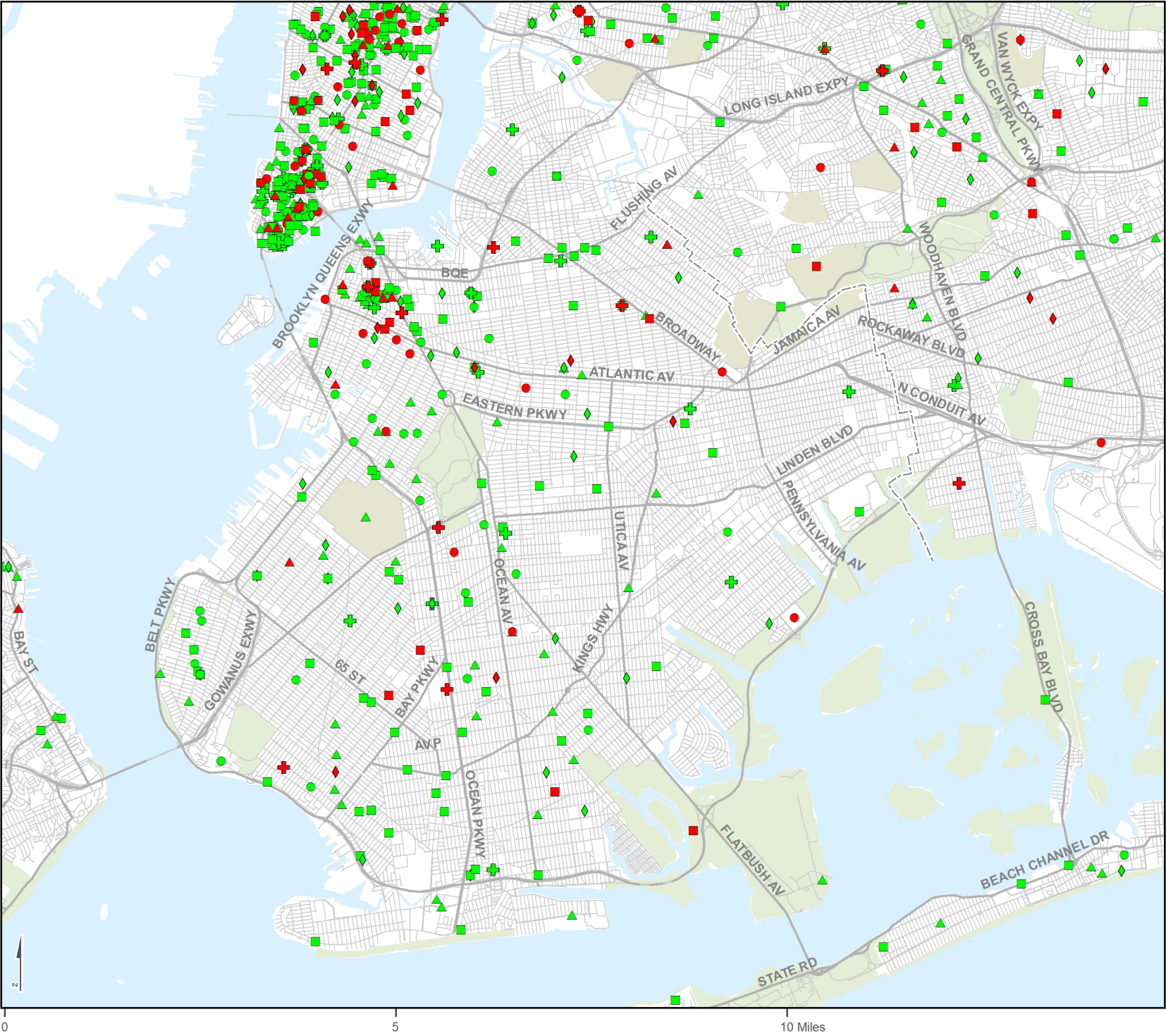
*Note – some questions were dependent on previous answers, meaning all participants were not presented with every question



National Wireless Emergency Alert System 10/3/18 Test – Survey Results | Brooklyn

Source: New York City Emergency Management Survey Tool / GIS Track-It #109443

Produced: 02 Nov 2018



Received alert

- Yes
- No

Carrier

- Verizon Wireless
- AT&T Mobile
- T-Mobile
- Sprint
- Other

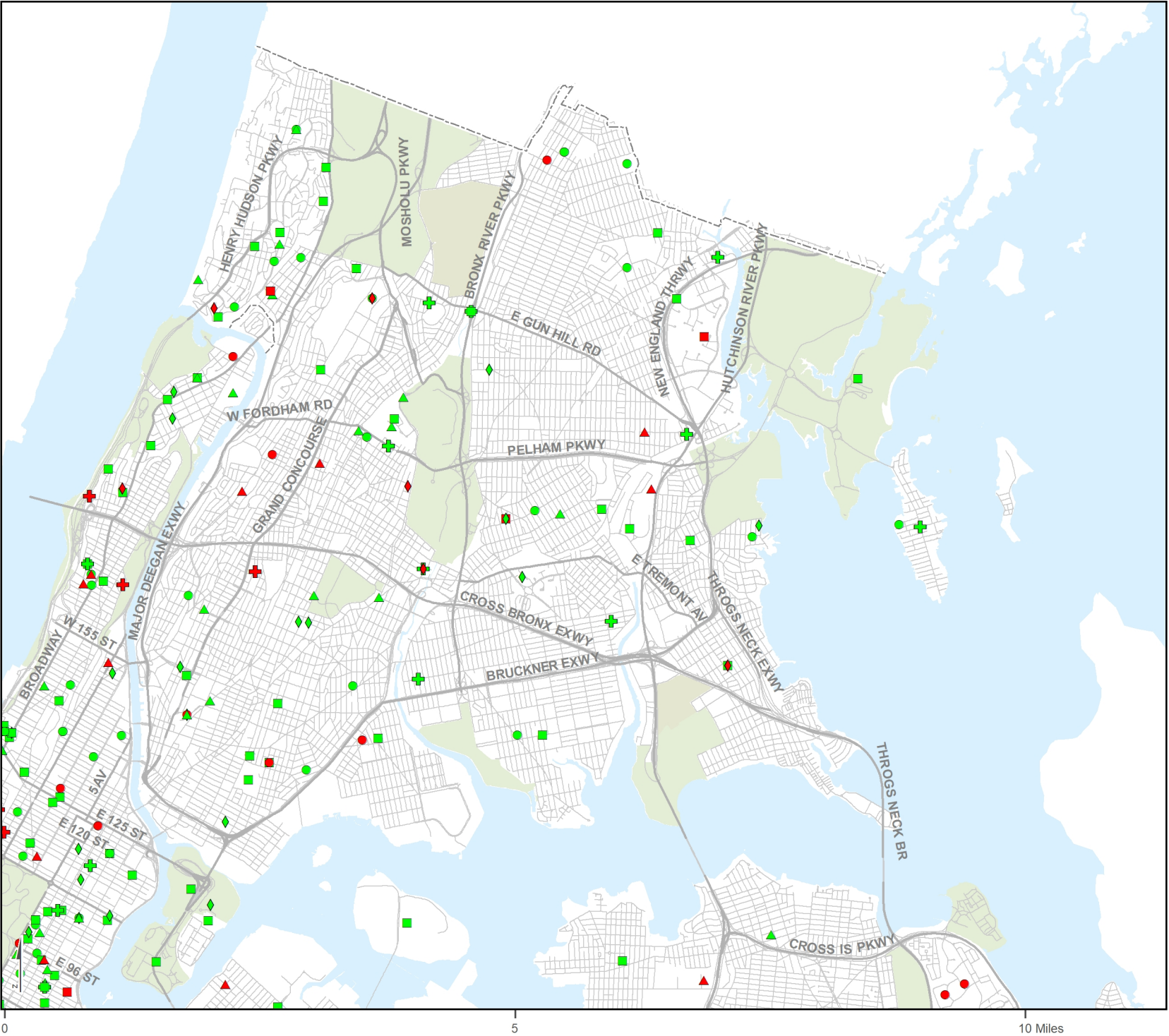
Survey Statistics

Total NYC survey responses: 1,705
NYC survey responses geocoded by address: 1,451
NYC survey responses geocoded by ZIP Code: 217
NYC survey responses not geocoded: 37

National Wireless Emergency Alert System 10/3/18 Test – Survey Results | Bronx

Source: New York City Emergency Management Survey Tool / GIS Track-It #109443

Produced: 02 Nov 2018



Received alert

- Yes
- No

Carrier

- Verizon Wireless
- AT&T Mobile
- T-Mobile
- Sprint
- Other

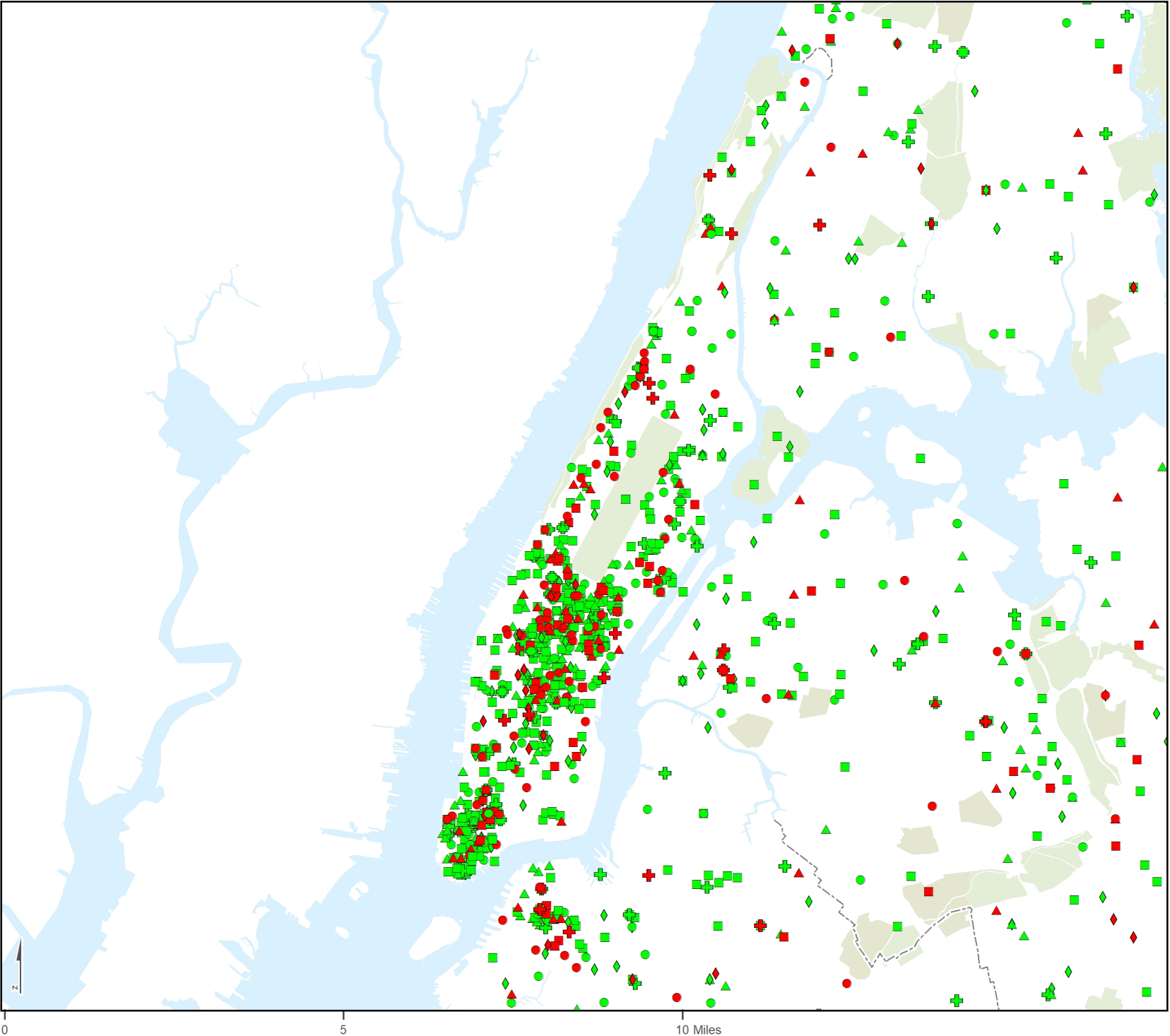
Survey Statistics

Total NYC survey responses: 1,705
NYC survey responses geocoded by address: 1,451
NYC survey responses geocoded by ZIP Code: 217
NYC survey responses not geocoded: 37

National Wireless Emergency Alert System 10/3/18 Test – Survey Results | **Manhattan**

Source: New York City Emergency Management Survey Tool / GIS Track-It #109443

Produced: 02 Nov 2018



Received alert

- Yes
- No

Carrier

- Verizon Wireless
- AT&T Mobile
- T-Mobile
- Sprint
- Other

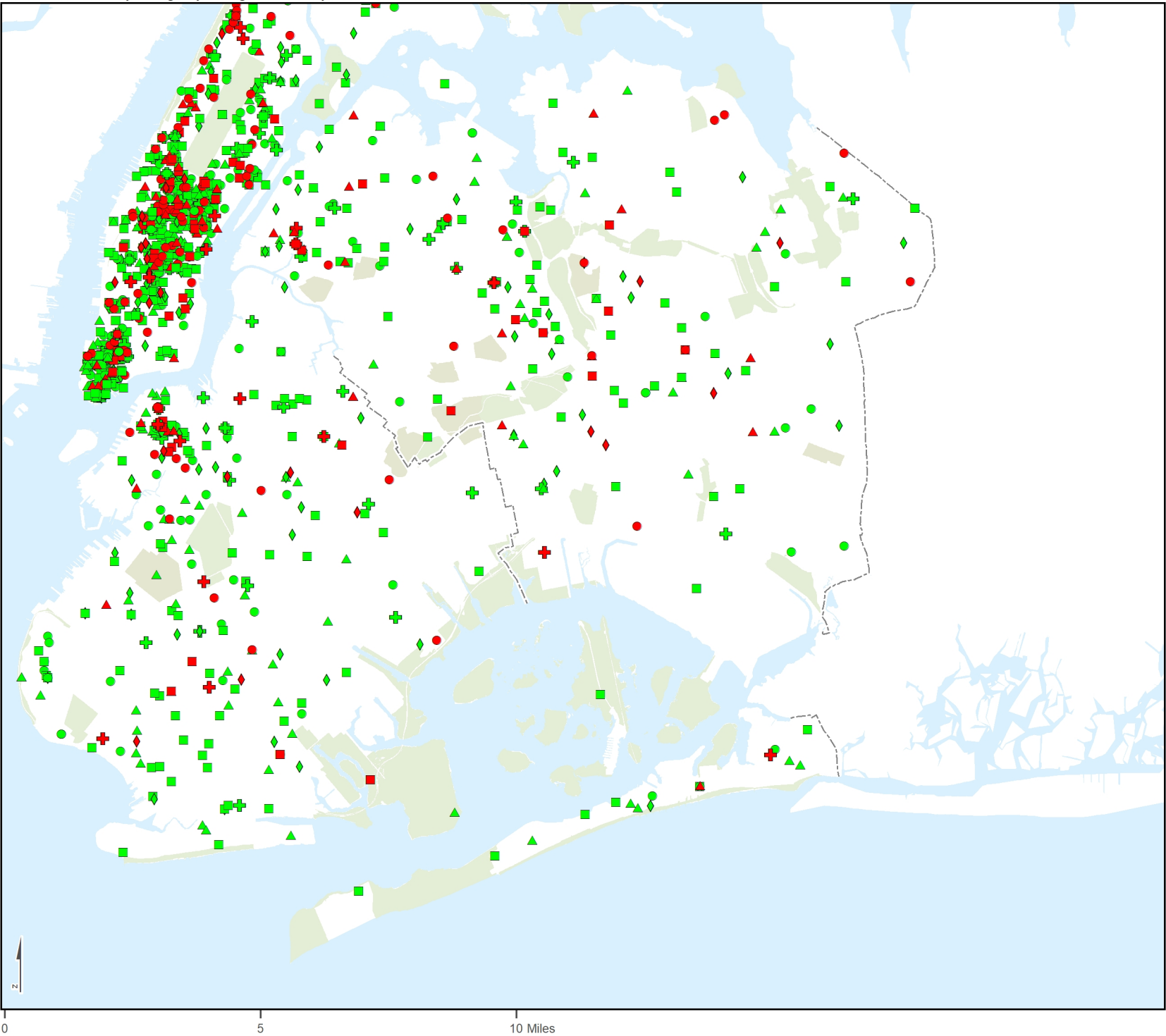
Survey Statistics

Total NYC survey responses: 1,705
NYC survey responses geocoded by address: 1,451
NYC survey responses geocoded by ZIP Code: 217
NYC survey responses not geocoded: 37

National Wireless Emergency Alert System 10/3/18 Test – Survey Results | Queens

Source: New York City Emergency Management Survey Tool / GIS Track-It #109443

Produced: 02 Nov 2018



Received alert

- Yes
- No

Carrier

- Verizon Wireless
- AT&T Mobile
- T-Mobile
- Sprint
- Other

Survey Statistics

Total NYC survey responses: 1,705
NYC survey responses geocoded by address: 1,451
NYC survey responses geocoded by ZIP Code: 217
NYC survey responses not geocoded: 37

National Wireless Emergency Alert System 10/3/18 Test – Survey Results | Staten Island

Source: New York City Emergency Management Survey Tool / GIS Track-It #109443

Produced: 02 Nov 2018



Received alert

- Yes
- No

Carrier

- Verizon Wireless
- AT&T Mobile
- T-Mobile
- Sprint
- Other

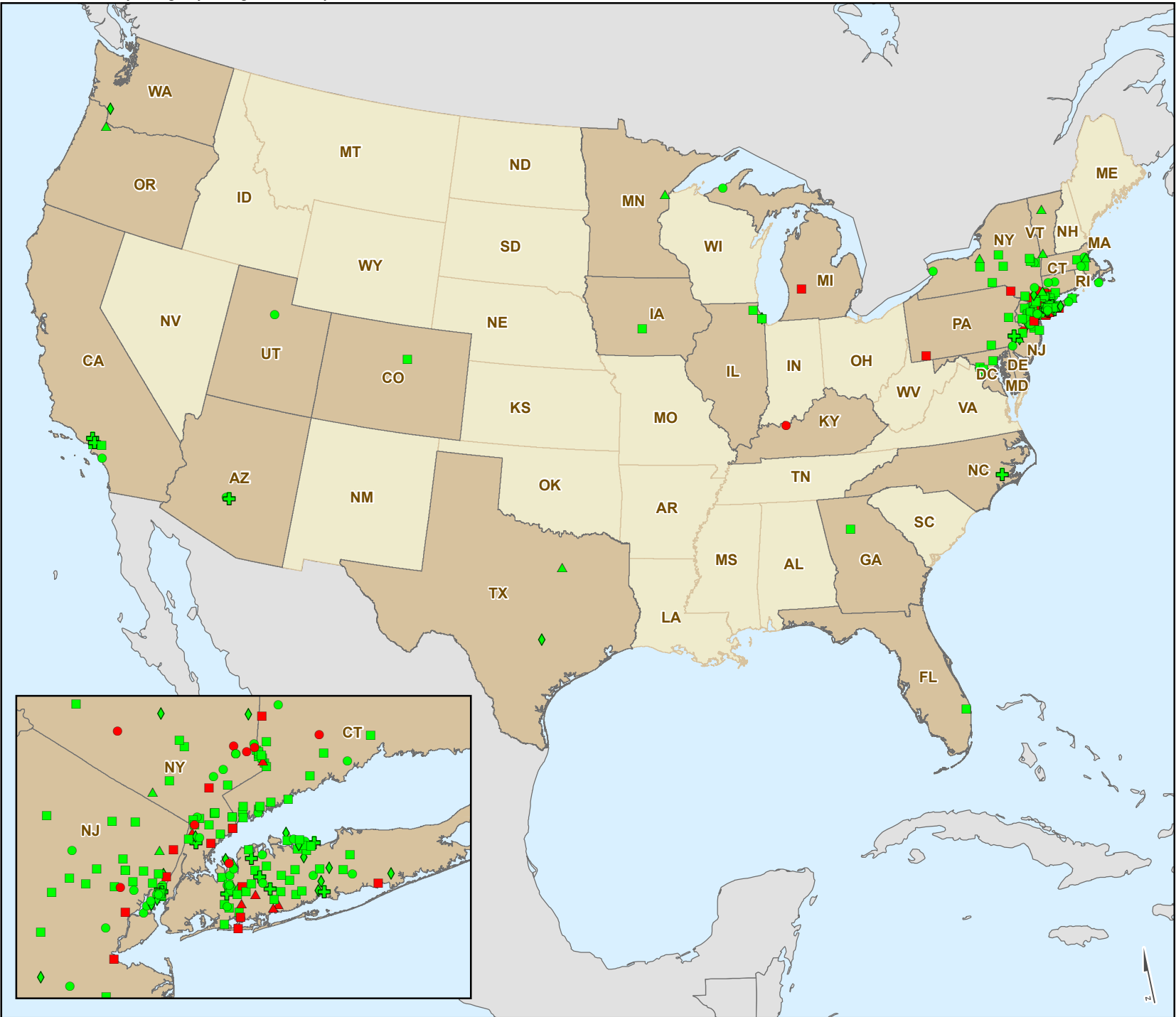
Survey Statistics

Total NYC survey responses: 1,705
NYC survey responses geocoded by address: 1,451
NYC survey responses geocoded by ZIP Code: 217
NYC survey responses not geocoded: 37

October 3, 2018 WEA Non-NYC Survey Results

Source: New York City Emergency Management Survey Tool, Esri / GIS Track-It #109443

Produced: 19 Nov 2018



Received alert

- Yes
- No

Carrier

- Verizon Wireless
- AT&T Mobile
- T-Mobile
- Sprint
- Other

- US state with WEA response
- US state with no WEA response
- Country boundary

Non-NYC Survey Statistics

Total Non-NYC survey responses: 299
Non-NYC survey responses geocoded by ZIP Code: 255
Non-NYC survey responses not geocoded: 44