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December 19, 2017

Marlene Dortch
Secretary

Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte*, PS Docket No. 15-91

Dear Ms. Dortch:

On December 15, 2017, I spoke by phone with Public Safety and Homeland Security Bureau Acting Deputy Chief Nicole McGinnis, and on December 18 Mark Reddish and I met with representatives of the Bureau, Office of General Counsel, and several public safety and industry stakeholders to discuss the FCC's 2016 Wireless Emergency Alerts (WEA) Further Notice of Proposed Rulemaking (FNPRM).¹ Specifically, we discussed the need for improved geo-targeting for WEA messages.

From APCO's perspective, the public stakeholders and industry representatives agree on several important points:

- Improving geo-targeting for WEA will save lives.
- The goal for geo-targeting is to have messages received by 100% of WEA-capable devices in the target area, with overshoot to devices no more than .10 miles beyond the target area's boundary, regardless of the type of alert or size and shape of the target area.
- Many WEA-capable devices in circulation can accurately determine their locations for non-WEA purposes.
- Alert originators should be able to simply identify the target area, and service providers should have flexibility to employ multiple technologies to deliver messages to an area that matches the target.

The parties have not reached consensus, however, on details such as the timing of improvements and how they should be implemented. APCO supports establishing straightforward minimum requirements for the

¹ In the Matter of Wireless Emergency Alerts, PS Docket No. 15-91, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 16-127 (rel. Sept. 29, 2016).

geographic targeting of WEA messages, effective no later than May 1, 2019:² “A Participating CMS Provider must transmit any Alert Message that is specified by a geocode, circle, or polygon to an area that matches the specified geocode, circle, or polygon. Delivery shall not exceed .10 miles beyond the specified area’s boundary.”

Service providers should have incentives to ensure that message delivery is as accurate as possible. For example, establishing a method for assessing the accuracy of geo-targeting that goes beyond the provisions for state/local WEA testing could encourage improvement. Further, alert originators, if well-informed of the status of geo-targeting performance, could tailor their emergency management activities accordingly. The Commission should require service providers to report on the extent to which messages were delivered outside a specified area’s boundary.

Finally, APCO agreed with concern over proposals to improve geo-targeting by sacrificing characters in the WEA message to specify the target area. APCO would prefer that methods to improve geo-targeting not entail a trade-off with other improvements to WEA.

APCO appreciates the Commission staff, public safety stakeholders, and industry representatives for working collaboratively to address this important public safety issue.

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):
Lisa Fowlkes
Nicole McGinnis
Anjali Singh
James Wiley
Rasoul Safavian
Megan Henry

² This would align with the existing deadline to expand the character length of WEA messages, which would be beneficial for alert originators. While APCO accepts that completing standards and software updates might be necessary to implement approaches to geo-targeting that have been under consideration for several years, we are hopeful that the industry will move expeditiously, much as they did to implement the embedded references capability for WEA.

Meeting Participants

Big City Emergency Managers

Ben Krakauer (New York City Emergency Management)*

Francisco Sanchez (Office of Homeland Security & Emergency Management, Harris County, Texas)*

CTIA

Matthew Gerst

Tom Dombrowsky (DLA Piper)

CTIA Member Companies

Mike Tan (AT&T)

Rob Kubik (Samsung)*

Ray Rothermel (Sprint)

Shellie Blakeney (T-Mobile)

Eric Hagerson (T-Mobile)

Grant Spellmeyer (USCellular)

Bill Tortoriello (USCellular)*

Rob Morse (Verizon)

Farrokh Khatibi (Qualcomm)*

National Weather Service, NOAA

Mike Gerber

Hugh Schratwieser

Office of General Counsel

Anjali Singh

Public Safety & Homeland Security Bureau

Lisa Fowlkes

Nicole McGinnis

Megan Henry

James Wiley

Rasoul Safavian

*Participated via Conference Bridge