



December 28, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mr. Chairman and Commissioners,

As 2017 comes to an end, the public safety community finds itself lacking the life-saving technology updates to the Wireless Emergency Alerts (WEA) system that have been in discussion for years. When finding the nearest coffee shop is possible within seconds, we are at a loss for how this precise geo-targeting cannot also be used to save lives with critical safety messages in times of emergencies. The 1/10th of a mile granular WEA geo-targeting capabilities have been a request since CSRIC IV, which ended in March, 2015. We are writing to express our concern that a device-assisted geo-targeting capability timeline and requirements have still not been adopted after the FNPR period. The time to act on WEA geo-targeting improvements is now.

Hurricane Harvey, the largest and costliest flooding event in U.S. history, presented a necessity for Harris County to send a WEA message to the entire county – more than 4 million people in the nearly 1,800 square mile area. For that, WEA worked well. However, due to lack of confidence in more precise geo-targeting, the practicality of WEA for Harvey was limited. Had the 1/10th of a mile geo-targeting been in place, Harris County would have sent additional alerts to residents that needed specific safety messages – such as the residents near the Addicks and Barker reservoirs – to help save lives. Hurricanes Maria and Irma in September, the Las Vegas shootings in September, the Northern California Wildfires in October, the attempted bombing in New York City earlier this month, and the ongoing Thomas Fire are all prime examples where granular WEA geo-targeting could have saved lives and property.

In September of 2016, the Commissioner, now Chairman Pai stated that “we need to do more than just codify the status quo. . . . [and] proposed that we be more forward leaning, that we commit in this Order to moving ahead with a device-based approach to geo-targeting. By



COUNTY JUDGE ED EMMETT
DIRECTOR

enabling devices to screen emergency messages and only allow the relevant ones through, this approach would allow public safety officials to target information to specific geographic areas. And it would advance WEA as a platform by reducing "alert fatigue." We agreed with that statement 15 months ago, and we agree now. By including the coordinates of the alert area in the 360-character message, public safety can target alerts, allowing the device to determine its location and decide whether or not to play an alert. Additionally, the coordinates can be used to display the alert area on the device, reducing the need to use characters to explain the geographic location of the alert. A software update will allow this life-saving enhancement to exist. To enable this capability by May of 2019, wireless carriers can utilize the software update process that they regularly employ to enhance the technology, features and functionality that reside in our devices.

The WEA service today already includes device-specific discrimination -- based on personal programming on the device -- to allow users to turn "off" and "on" the Amber and Imminent Threat alerts they are sent. WEA enabled devices already have the technology they need to add device based discrimination: the capability to receive cell broadcast messages, the ability to know the device's location, the functionality to display maps, and the processing power to incorporate all three of these and more. The wireless industry can update the software in the devices to incorporate existing features and functionality that will allow the device to use its location to decide if the device should play or not play the message, just like it checks the personal settings to make sure the device has enabled an Amber or Imminent Threat alert.

Harris County urges the FCC to act swiftly to meet the need for enhanced WEA geo-targeting capabilities no later than May 2019, the same timeframe set for the previously approved WEA upgrades to rollout. This deadline provides more than a year for the industry to work with the public safety community on an issue that has already been fleshed out extensively and where the needed technology for handheld devices already exists. Failure to do so leaves the Texas Gulf Coast region susceptible to three or more potentially deadly hurricane seasons without the ability to properly alert our citizens.

Failure to roll out these improvements by May 2019 is irresponsible to the citizens that we are charged to serve and protect. It will erode the trust of wireless alert originators to send a timely, precise message when life or death may be on the line. The public safety community is expected to remain technologically viable in its efforts to respond to emergencies, and we would be failing to meet that expectation if we go beyond the May 2019 timeline for geo-targeting enhancements.



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We respectfully request that the FCC take immediate action to ensure that industry meet these standards before more lives are put at risk.

Sincerely,

A handwritten signature in black ink, appearing to be "Francisco Sanchez", written over a horizontal line.

Francisco Sanchez
Public Information Officer/Liaison
Harris County Office of Homeland Security & Emergency Management