Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of Review of the	)	
	)	
Wireless Emergency Alert System	)	EB Docket No. 15-91
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	)	

To Chief, Public Safety and Homeland Security Bureau:

EX PARTE SUBMISSION OF GLOBAL SECURITY SYSTEMS, LLC

Global Security Systems, LLC ("GSS" or "Company"), hereby respectfully submits this ex parte submission the relating to important issues raised in the Wireless Emergency Alert (WEA) Report and Order. A telephone conference call took place between the FCC staff members Jane Kelly, Gregory Cooke, and James Wiley, and GSS's Matthew Straeb on April 23, 2015. Specifically, the teleconference is reflected in this exparte with comments herein focused on the matter of CSRIC Working Group 2-Geographic Targeting, Message Content and Character Limitation Subgroup Report.

I. INTRODUCTION – GSS INTEREST IN THIS PROCEEDING

GSS is a systems integrator, service provider, and manufacturer of ALERT FM, an FM radio-based emergency alert system, GSSNet, satellite delivery system, and GSSNet Alert Studio, a Common Alerting Protocol ("CAP")-Emergency Alert System ("EAS") message delivery system. GSS has participated in the development of Integrated Public Alert and Warning System ("IPAWS")-based systems, is a member of the Commercial Mobile Alert Service systems committee, and is actively involved with several EAS and CAP committees. The GSS nationwide GSSNet satellite delivery system for emergency alerts currently is in operation now at over 450 locations and growing daily. It includes the ability to generate and deliver CAP messages and deliver rapid alerts for Earthquake Early Warning and tornado activity.

II. GSS' COMMENTS REGARDING WEA CSRIC WG2 REPORT

1. Geographic Targeting- GSS supports geo-coded alerts as provided by a compliant CAP message, for the purpose of delivering and displaying a polygon-based alerts. However, the number of pairs of geocoded information and length of the alert message should be formed to match the capabilities of the dissemination system. Note, WEA was intended to be a "bell ringer" for citizens to receive alert message a device that was convenient and used in everyday life. For additional information, the citizen would refer to other outlets to receive comprehensive information such as broadcast TV/radio or Internet sites.

Testing and social science should be performed to determine an optimal number of points and length of message, our experience has yielded a reasonable number of geocoded data should be limited to up to nine pairs of lat/long information with a short text alert message. Polygon alerts can provide a visual representation of an alert, which can be interpreted by the citizen in a shorter period of time than reading long text message. Polygon alerts introduce a number of challenges such as overshooting or undershooting the coverage area. The recommendation for ATIS/TIA testing would yield real world data to understand and confirm a reasonable set of geocoded pairs and length of the alert message. The message length could be reduced to 140 characters for example since the no location information would be needed to be represented in the text of a polygon-based alert.

2. Message Content- In light of the fact that WEA is a "bell ringer" service the message content would be limited to severe or imminent situations and not used for non-threatening situations.

3. Character Limitation- The WEA service is not intended to be a reading service and 280 characters should be enough to provide life-saving information for the citizen. Actually, our experience has shown that 160 characters build a framework for the alert originator to be concise and deliberate with the message creation. Further, the alert origination software tools are not intended to be complicated or cumbersome for the alert originator to navigate or use since they are not sending out alerts on a regular basis. Simplicity reduces errors and forces good messaging.

Please consider all the foregoing comments.

Respectfully submitted,

GLOBAL SECURITY SYSTEMS, LLC

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