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May 5, 2015

VIA ELECTRONIC FILING

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

Re: Wireless Emergency Alerts (WEA) – Docket # 15-91

Dear Ms. Dortch:

On Wednesday, April 22, Brian Daly, Peter Musgrove, Peter White, and the undersigned from AT&T had a conference call with James Wiley, John Evanoff, Zenji Nakazawa, and Gregory Cooke from Public Safety and Homeland Security Bureau about the recommendations made in the Communications, Security, Reliability, and Interoperability Working Group 2 report from June of 2014. As part of this discussion, the Public Safety Bureau invited AT&T to place our comments on the record.

AT&T reiterated its position that Wireless Emergency Alerts (WEA) should remain a “bell ringer” service alerting wireless users to seek more information about imminent threats. In addition, AT&T urged that pursuant to the original concept of the WARN ACT, Alert Originators should remain solely responsible for alert message content and area definition. WEA is not a purpose-built alert system as is the NWS Weather Radio and as such policy makers should accept the limitations inherent in the cellular system. The carrier obligations of WEA can only be met by the native broadcast capabilities defined in the standard.

With respect to the recommendations on increased message length, AT&T believes that this can be accomplished in LTE Networks following the release of the ATIS feasibility study and the completion of appropriate standards. The updated message length for WEA messages will require new handsets and it will take time to standardize, deploy in the core network, modify the interface to FEMA IPAWS, and get quantities of handsets out to wireless users. The message length recommendation of approximately 280 characters does, however, seem achievable. Any timelines associated with the increased message length must include the time for FEMA changes and alert originators to use the capability along with handset replacement.

In terms of some of the recommendations on additional supplemental data for WEA, the use of phone numbers or URLs in alerts should be limited to Amber Alerts. AT&T still maintains that phone numbers or URLs in all other alert classes poses risk to the network with the



likelihood of a communication failure to those in need. Rich multimedia is not technically feasible in the cell broadcast-based WEA. Rich multimedia would require new multimedia broadcast technologies involving costly updates to both network infrastructure and handset technology as well as a significant amount of time. This change should not be supported as part of WEA. While there are benefits to retrieving supplemental data via Wi-Fi and offloading from the cellular network, the WEA obligations are on cellular providers and Wi-Fi is not a Commercial Mobile Service Provider (CMSP) technology.

Geo-targeting for WEA should be enhanced to support the best approximation of the supplied polygon; AT&T voluntarily supports this for all WEA alerts, exceeding current FCC rules. AT&T encourages all carriers voluntarily to support geo-targeting to the best approximation of the supplied polygon, and believes that alert originator concerns of over-alerting can be alleviated with polygon-level geo-targeting. Therefore, AT&T recommends the industry (ATIS) developing geotargeting best practices for using the cell broadcast geotargeting capabilities to best approximate the alert polygon as the geo-targeting granularity required for a WEA alert already exists in cell broadcast. Device assisted geo-targeting is problematic including device determination of its location in relation to the location of the alert. Any device-assisted method requires sending down the polygon coordinates to the mobile device, delaying the notification and taking away from the characters used to inform the citizens. In addition, device-assisted methods require the mobile device to know its location, which may not be possible under all scenarios. As discussed previously, rich multimedia, including displaying maps, are also problematic because doing so would require new technologies requiring significant changes to the core network as well as to handsets. More information should be available as ATIS completes the feasibility study on the subject of geo-targeting. AT&T recommends the FCC wait until this feasibility study is complete before discussing changes to the current geotargeting rules.



Relative to testing, the originator should be responsible for testing and it should only go to test devices, not to all wireless subscribers. Any testing should be viewed as testing the readiness of alert originators, and should not be viewed as testing of the CMSP or wireless infrastructure. Testing should not involve or affect carriers, and reported issues such as “coverage” or “scope of received messages” should not be a carrier responsibility.

Pursuant to the Commission’s rules, a copy of this notice is being filed electronically in the above-referenced docket. Please do not hesitate to call me if you have questions.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

Cc:
James Wiley
John Evanoff
Zenji Nakazawa
Gregory Cooke