

June 12, 2015

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

James Arden Barnett, Jr.

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Re: Wireless Emergency Alerts (WEA), Public Safety Docket No. 15-91

Dear Ms. Dortch:

On June 2, 2015, James Arden Barnett, Jr. of the law firm Venable LLP met with Rear Admiral David G. Simpson, Bureau Chief of the FCC's Public Safety & Homeland Security Bureau ("PSHSB") regarding Wireless Emergency Alerts (WEA) on behalf of AC&C, LLC, doing business as Precision Global Alerts or PGAlert.

Mr. Barnett discussed with Rear Admiral Simpson that while the deployment of WEA has been a success, especially with regard to weather alerts generated by the National Weather Service (NWS), the capability has not been widely used by state and local jurisdictions. Additionally, the initial generation of WEA does not provide more information than just a notification that danger exists, and the character limitation does not provide meaningful information for persons in the danger zone or affected area to take meaningful and timely steps to save their own lives or the lives of others without additional sources.

WEA must progress quickly to provide a more specific, targeted geo-location and with additional information within the body of the alert. The technologies to do so already exist and are compatible with the Integrated Public Alert Warning System (IPAWS) and the Common Access Protocol (CAP). WEA also must evolve now and over time to keep up with advances in technology.

However, under the current schema, WEA is not likely to advance past its current capabilities. Wireless carriers have invested millions of dollars, time, and other resources to make WEA work which the carriers have done voluntarily as a public service under the Warning, Alert and Response Network (WARN) Act (Title VI of Public Law 109-347). Carriers, having made the investment, are not likely to invest in research, development and technological improvements for WEA without some even modest revenue stream. The WARN Act does not allow charging customers for the alerting service, and WARN prevents the FCC from adopting mandatory requirements, so WEA could remain stagnant.

With the technological limitations and sparse amount of information contained in the current WEA configuration, state and local entities will be less inclined to use WEA and the

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utilization rate, other than NWS, could remain abysmally low even as disasters and emergencies seem to increase. In other words, WEA may not reach anything close to its full potential, a cost that could be counted in lives, and its fate may be mired in the current technology.

Mr. Barnett said that the FCC must explore avenues where the carriers can pursue some revenue related to their respective WEA capabilities that will permit the advancement of the technology and the evolution of the quality of the alerts and the information they contain to the consumers who receive them. Numerous local governmental entities already pay for commercial alerting services, indicating a strong need for these services. The FCC should actively seek all available courses of action to ensure that carriers have incentives to continuously improve WEA, including various avenues of revenue sources allowed under law. To do otherwise is to doom WEA to an information-poor, under-utilized, under resourced, and obsolescent future.

This disclosure is made in compliance with 47 C.F.R. § 1.1206.

Sincerely,

/s/ James Arden Barnett, Jr.

James Arden Barnett, Jr.
Rear Admiral USN (Ret.)
Venable LLP

cc: RADM David Simpson, Bureau Chief
Lisa Fowlkes, Deputy Bureau Chief
Zenji Nakazawa, Acting Division Chief, Policy and Licensing Division