Comments on behalf of Osage County Emergency Management Agency, Missouri.

- **FCC proposes expanding the WEA message length from 90 to 360 characters**

The proposed expansion of the WEA message length to 360 is fully supported. Not all alerts will require that many characters but if the need/emergency arises in which additional information needs to be released, the character space is available.

1. How would this provide more detailed alert information to the public sufficient to motivate appropriate and swift action to save lives and protect property (Section III, A, 1, Paragraph 9)?
2. How would this affect accessibility of messaging to people with disabilities, senior citizens, and persons with limited English proficiency (Section III, A, 1, Paragraph 10)?
3. How can we quantify the potential life-saving benefits of increasing the character length (Section III, A, 1, Paragraph 10)? Similar to the NWS Impact Based Warnings…some people simply need to see potential impact before they take action.
4. Is 360 characters the optimal maximum? What number of characters is necessary to provide detailed information about the emergency (Section III, A, 1, Paragraph 11)?
5. Is it feasible for alert originators to provide both 90 character and 360 character messages to accommodate new and legacy implementations (Section III, A, 1, Paragraph 13)?

- **FCC proposes adding a new WEA category titled "Emergency Government Information" for non-emergency type messages (i.e. boil water, shelter locations)**

This proposal is fully supported and recommended! Emergencies start locally, so the ability to alert citizens in the affected area is ideal. This category should be allowed to be issued as a stand-alone alert. While a boil water advisory may not be a life threatening event, citizens should still be made aware. If the event should turn into something greater, then hopefully fewer people can say they had no knowledge of the information.

1. How should the FCC define the "Emergency Government Information" category (Section III, A, 2, Paragraph 18)? I support the title "Emergency Government/Local Information"
2. Would adding this category of alerts expand the alerting toolkit in a meaningful way (Section III, A, 2, Paragraph 18)?
3. Should this category be restricted to be used in conjunction with an Imminent Threat alert, or allowed to be issued as stand alone (Section III, A, 2, Paragraph 19)? NO. Allow it as a stand-alone alert.
4. What kind of guidelines can be applied to this alert category (Section III, A, 2, Paragraph 19)?
5. Should this category of alerts be restricted to certain "appropriate agencies" (Section III, A, 2, Paragraph 19)?
6. Would adding this category desensitize the public to other alert categories (Section III, A, 2, Paragraph 19)? This is where Emergency Managers need to use their best judgement with the amount of characters they use. While some alerts will be brief, others may need additional preparedness information. More alerts could be brief, with the approval of URLs and telephone numbers.

7. Should this category be an "opt-in" or "opt-out" category (Section III, A, 2, Paragraph 21)? I don't believe ANYONE should have the ability to opt out of ANY of the WEA alert categories. These are not malicious or telemarketing messages. They are legitimate public safety messages that need to be relayed to the public in a timely manner. This is the best and most efficient way to get the message out. As it is, the system is rarely used. Let's start taking FULL advantage of this brilliant system!
8. Should WEA be broken out into other additional categories (i.e. Severe Weather Alerts, Local Alerts), and if so, how would they be different from Presidential, AMBER, Imminent Threat, or Emergency Government Information categories (Section III, A, 2, Paragraph 22)? So long as the NWS continues to send severe weather alerts, the locals shouldn't need to. Keep it simple and leave it as "Emergency Government/Local Information" or "Local Alerts" or something similar.

- **FCC proposes allowing URLs and telephone numbers in WEA messages which were previously prohibited**

YES!!! As stated above, using the common sense approach, some alerts can remain brief this the ability to click on a URL to additional information.

1. Would including URLs and phone numbers in WEA messages advance public safety (Section III, A, 3, Paragraph 25)?
2. Does the public currently turn to the internet for additional information when they receive a WEA message (Section III, A, 3, Paragraph 25)? Yes and No. Some may not know where to go or even take the time to look. But if the URL is made available to them, they would be more inclined to look.
3. Would including URLs and phone numbers improve alert quality and accessibility (Section III, A, 3, Paragraph 26)?
4. Would including URLs and phone numbers reduce "milling" behavior by directing the public to specific information (Section III, A, 3, Paragraph 26)?
5. Would including URLs and phone numbers enhance AMBER alerts (Section III, A, 3, Paragraph 27)? Possibly, if the URL is a direct link to a site with a photo and additional information about the victim(s) and subject(s).
6. Would including URLs and phone numbers enhance accessibility to those with disabilities, senior citizens, and persons with limited English proficiency (Section III, A, 3, Paragraph 29)?
7. Currently WEA supports text only. Would the addition of images, maps, or other multi-media content in the WEA message significantly enhance the usefulness of the system (Section III, A, 3, Paragraph 30)? YES! Again, using the common sense approach, a map or image could be extremely beneficial for alerts.

- **FCC proposes including multilingual WEA messages**

1. Would the addition of multilingual WEA provide any benefits (Section III, A, 4, Paragraph 32)? Absolutely. Would it changed based on the iPhone language selected by the phone user?

- **FCC proposes improvements to WEA geo-targeting of alerts**
  1. FCC proposes requiring cell carriers to transmit alerts to the polygon level (or closest approximation) as opposed to the county level, and therefore seeks comments on this proposal and rationale (Section III, B, Paragraph 37). The alerts should be as accurate as possible. If the initiator can transmit to the lowest level, polygon level, then YES it should be made available.
  2. FCC is considering other approaches would improve geo-targeting (i.e. device-based geo-targeting, cell sectorization), and seeks comments on potential benefits to emergency managers. How would more accurate geo-targeting minimize over-alerting, reduce alert fatigue, and minimize problems of bleed-over (Section III, B, Paragraph 41)?

- **FCC proposes inclusion of local WEA test codes**

Testing must be done on a regular basis to prevent system/equipment/software failures and to be familiar with the system.

  1. FCC proposes allowing state and local testing. The approach defines immediate delivery of the test message (vs allowing cell carriers to delay it up to 24 hours). The approach also provides for a public opt-in (the public would have to enable the test code on their phone) to receive the test message vs opt-out. Please comment on this approach (Section III, C, 1, Paragraph 47).
  2. There are two alternative approaches being considered, a) delaying test messages up to 24 hours, and b) making public receipt of test messages an opt-out option. Please comment on these alternatives (Section III, C, 1, Paragraph 51).
  3. How often should state and local agencies be allowed to test (Section III, C, 1, Paragraph 49)? At a minimum, during training upon IPAWS agreement approval. Other than that, I think monthly is acceptable.
  4. What public safety benefits would come from state and local testing (Section III, C, 1, Paragraph 50)? The ability to use the system effectively in a crisis without hesitation or questions due to lack of use with the system.

- **FCC proposes requiring cell carriers to log alerts and provide reports**
  1. FCC proposes requiring cell carriers to generate monthly system and performance statistics reports based on category of alert, alert originator, alert area, and other alerting attributes (Section III, C, 2, Paragraph 56). FCC seeks comment on whether cell carriers should report on alert delivery latency, accuracy of geo-targeting, and quality of public response (Section III, C, 2, Paragraph 57). Please comment on the extent to which this reporting would benefit alert originators. Would requiring this of cell carriers, prevent new carriers from joining WEA alerting? Another option would be for the Interoperable Software System to provide the reports and statistics.
  2. How should this reporting information be shared? Should it be restricted (Section III, C, 2, Paragraph 58)? Through an online portal when requested by the end user.