

Comments Regarding PS Docket No. 15-91

NPRM “Improving Wireless Emergency Alerts And Community-Initiated Alerting”

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My comments will deal with Section III, Parts A, B, and D of the NPRM and have a conclusion at the end.

III A-1 Increasing Maximum WEA Character Length.

After consulting with those in the Emergency Management community I have discovered that the current 90 character limit is somewhat misleading. The various programs used by originators of alert messages use templates to assist in the expedient publishing of alert messages. These templates take up a number of characters which decrease the amount of direct information space available for the alert. Increasing the number of characters will increase this amount of space. I support increasing the maximum character length.

III A -2&3 Classifying Emergency Gov't. Information & Content in WEA Alerts

Increasing the types and kinds of alerts is a positive step. Each alerting agency should have the ability to originate the alerts they deem necessary in their individual responsibility zones.

III A -4 Providing Multilingual WEA Messages

This has been a political item for the last few years which does have merit and WEA is the best platform for multilingual and special community alerting. The Minnesota test showed that there are ways to use English letters to convey alerts in non-English languages that use characters or other non-English means of written communication. Eventually I do see the technology evolve to the point of being able to send these other forms of communication, but in the interim the ability exists to convey alerts without them.

Expecting broadcasters, in particular, to start airing multilingual alerts, in languages not native to the format of that broadcaster, will greatly diminish the effectiveness of those alerts. There will be few, if any, listening to any broadcaster if the normal programming format is not of their native, or an acquired, language. It will also result in an even more negative opinion of alerting in the broadcast community if they are forced to multiply the amount of time necessary to broadcast a single alert in multiple languages. Using WEA as the “doorbell” will allow those multilingual and special community users to go to the information dissemination point of their choice to receive more detailed information.

III B WEA Geo-Targeting

By its very nature the current cellular phone is very geo-specific in its operation. Leveraging this ability to include geo-targeting small predefined areas should greatly increase the acceptance of WEA alerting by the general public. No one wants to get an alert at 3AM for an event or incident that has no immediate impact on them individually. However should it impact them individually they would welcome the alert. One of the negatives that will have to be addressed in training will be "Over Alerting". Alerts lose effectiveness if the population to be alerted has become too accustomed to them, or they have opted out due to a plethora of less than immediately relevant alerts. Broadcast and cable cannot alert to a localized, geo-targeted area due to the nature of the technologies that they employ. They are better suited to the role of detailed information disseminators serving a much wider area.

III D Participating CMS Providers and Subscribers

Whereas the object of this NPRM is to increase the alerting capability of WEA it is surely time to require all CMS providers to participate, just as broadcast and cable licensees have now been required to participate in EAS. CMS providers are required to install and maintain backup power generation at their individual transmission sites to maintain service under adverse conditions. Requiring these same providers to carry WEA alerts seems to be a common sense adjunct to adverse condition operation.

Conclusion

Geo-targeting is best served by a personal communications device, as is multilingual and special community alerting. It is time for all CMS providers to fulfill their leadership role in providing alerting services to their subscribers. These subscribers should have the ability to opt-out if they so choose, but WEA and the CMS providers need to make these alerts available to all who desire them. While a subscriber may not want all alerts while in their homes, they may very well need them when traveling or should extreme circumstances warrant. Using WEA to make the ubiquitous cell phone a de facto "Personal Pager" is nothing more than common sense. WEA set itself apart from the general EAS alert dissemination community at its inception. It is time that the CMS providers come into the fold and work with the entire EAS community. Their technology currently has the greatest ability to save lives and property in a timely manner on an individual basis.