

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

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)? **it would allow participating CMS providers to transmit WEA messages without requiring technical changes because 90 character messages were considered to be of sufficient length to get the consumers attention.**
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)? **Longer alert messages improve message interpretation reduce missing by personalizing alert messages, and hasten a protective response**
3. How can we quantify the potential life-saving benefits of increasing the character length (Section III, A, 1, Paragraph 10)? **Would improve the ability of NWS and non-weather alerting authorities to convey critical life-saving information over WEA such as spelling out key terms which are not abbreviated and may not be well understood.**
4. Is 360 characters the optimal maximum? **No** what number of characters is necessary to provide detailed information about the emergency (Section III, A, 1, Paragraph 11)? **140**
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)? **Yes**

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

1. How should the FCC define the “Emergency Government Information” category (Section III, A, 2, Paragraph 18)? **As an essential public safety advisory that prescribes one or more actions likely to save lives and or safeguard property during an emergency.**
2. Would adding this category of alerts expand the alerting toolkit in a meaningful way (Section III, A, 2, Paragraph 18)? **Yes**
3. Should this category be restricted to be used in conjunction with an Imminent Threat alert, or allowed to be issued as standalone (Section III, A, 2, Paragraph 19)? **In conjunction with an imminent threat.**
4. What kind of guidelines can be applied to this alert category (Section III, A, 2, Paragraph 19)? **Only appropriate agencies are authorized to issue Emergency Government Information messages**
5. Should this category of alerts be restricted to certain “appropriate agencies” (Section III, A, 2, Paragraph 19)? **Yes**
6. Would adding this category desensitize the public to other alert categories (Section III, A, 2, Paragraph 19)? **No**
7. Should this category be an “opt-in” or “opt-out” category (Section III, A, 2, Paragraph 21)? **No failure to opt in would prevent the subscriber’s device from receiving Emergency Government information if they opt out**
8. Should WEA be broken out into other additional categories (i.e. Severe Weather Alerts, Local Alerts), **yes** and if so, how would they be different from Presidential, AMBER, Imminent Threat, or Emergency Government Information categories (Section III, A, 2, Paragraph 22)? **Each have its own unique attention signal and vibration cadence**

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

1. Would including URLs and phone numbers in WEA messages advance public safety (Section III, A, 3, Paragraph 25)? **No it would encourage mass usage and potential congestion of the wireless networks**
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**
3. Would including URLs and phone numbers improve alert quality and accessibility (Section III, A, 3, Paragraph 26)? **yes**
4. Would including URLs and phone numbers reduce “milling” behavior by directing the public to specific information (Section III, A, 3, Paragraph 26)? **yes**
5. Would including URLs and phone numbers enhance AMBER alerts (Section III, A, 3, Paragraph 27)? **Yes**
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)? **yes**
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**

### **FCC proposes including multilingual WEA messages**

1. Would the addition of multilingual WEA provide any benefits (Section III, A, 4, Paragraph 32)? **Yes individuals should have access to emergency information regardless of what language they speak.**

### **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). **CMS providers may transmit an alert message to an area that closely approximates the target area**
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)? **Ensure WEA Alert messages only reach those people at risk and that the effectiveness of WEA Alert messages remain suppressed until they can be distribute to finer geospatial targeted populations so that message only reach the people who are at risk**

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

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). **The**

required WEA test message should be mandatory on all devices and should be identified as such as to prevent confusion.

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). The 24 hr test delay is necessary to manage traffic loads public receipt of test message should be not be an opt- out option. Testing allows for system verification, public awareness and originator proficiency although it may however cause unduly stress emergency call centers.
3. How often should state and local agencies be allowed to test (Section III, C, 1, Paragraph 49)? Monthly
4. What public safety benefits would come from state and local testing (Section III, C, 1, Paragraph 50)? That their handsets are capable of receiving a WEA message; WEA capability in coordinated public warning exercises and tests such as those required by the Nuclear Regulatory Commission for local emergency preparedness programs and providing the public with reassurance that local emergency management is capable of alerting them in times of disaster

#### **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. Reporting requirements are necessary to determine if the WEA alerts are reaching it intended audience, for testing purposes and WEA system reliability
2. How should this reporting information be shared? Should it be restricted (Section III, C, 2, Paragraph 58)? Electronic Test Reporting System; limited to federal, state, and local alert originators.