



Lexington-Fayette Urban County Government
Department of Public Safety
Division of Emergency Management

Jim Gray
Mayor

Ronnie Bastin
Public Safety Commissioner
Patricia L. Dugger, RS MPA
Emergency Management Director

January 11, 2016

Ms. Marlene Dortch
Secretary FCC
445 12th Street SW
Washington DC 20554

Subject: Notice of Proposed Rulemaking PS Docket No. 15-91, Improving Wireless Emergency Alerts and Community - Imitated Alerting

Dear Secretary Dortch and Member of the FCC,

The City of Lexington KY, Division of Emergency Management has supported the IPAWS, WEA system through the Chemical Stockpile Emergency Preparedness Program and has participated in test with the JTIC. Through these tests we have been able to find glitches with the various programs that IPAWS, WEA can be Initialed thru and would not know of these problems and could not have worked with the vendors to fix them if we have not been able to participate the testing. It also allowed us to learn more about how the messages are delivered and the time it takes to execute the message thru the delivery. This is Invaluable Information to have when you are making decisions about when and what type of emergency message to issue.

Use of the system will continue to be an integral part of our emergency public information strategy. We believe that changes are needed to the rules in order to fully utilize WEA as tool for emergency communications to the public.

We are pleased to provide our comments on the proposed rule.

The City of Lexington KY, Division of Emergency Management supports the following proposed rule changes.

WEA Messaging

- Increasing the maximum WEA character length from 90 to 360 will allow more specific instructions and provides for the inclusion of URLs, phone numbers and multimedia inputs.

- The addition of a classification for Emergency Government Information is a good option to provide. It is our opinion that this new classification should come with guidance and not be totally wide open to the discretions of the local governments.
- Providing the capability to issues alerts in other languages beside English is supported.

WEA GEO-Targeting

- The ability to provide alerts to an area smaller than the entire county is essential. The challenge will always be how many cell towers are in the targeted area and how many persons will receive the message outside the area due to cell coverage reach. Even with this challenge the smaller the area of alert, the better it will be to prevent "too many alerts and opt out or too many alerts, don't pay attention."

WEA testing

- The ability to test the system is critical. This allows for proficiency for the person sending out the alerts and for finding any issues within the system. When utilizing a system that delivers lifesaving messages, the time to determine it has an issue is not when it is being used in a real world event.

Sincerely,



Patricia L. Dugger, RS, MPA
Director, Lexington Fayette Urban County Government