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To: Federal Communications Commission

From: R. Scott Swearingin, Assistant Director

Date: January 13, 2016

Subj: Comments Regarding PS Docket No. 15-91
NPRM Improving Wireless Emergency Alerts and Community-Initiated Alerting

Wireless Emergency Alerts (WEAs) are quickly becoming a critical public alerting tool in the toolbox of the local emergency manager. However, to be meaningful, these messages must clearly tell the public if they are or are they are not in danger. They must also provide meaningful and actionable information. The proposed rulemaking will take several important steps in improving the functionality of WEAs as this critical alerting tool.

While, in my Emergency Management career, I am normally an originator of warning messages, I became a warning consumer during a vacation trip this past spring. I became very frustrated with the information that I received through a WEA and my subsequent inability to determine the best action needed to protect myself and my family.

I was travelling in a construction area on an interstate highway during a severe weather event when I received a WEA message indicating: "Tornado in your area. Take shelter now."

I was not familiar with the area and did not know where to tune my broadcast radio for more information. I did not know the size of the area alerted. Thus, I didn't know if the Tornado was in my immediate vicinity or at the opposite end of the rural county.

I will use this real-world example to explain how the proposed rules could have assisted in this situation. My comments on specific proposed rules are outlined below:

III A 1 Increasing Maximum WEA Character Length

It is very important to increase the WEA message length to improve this warning system and to avoid unintended consequences.

Under the existing 90 character limit, there are barely enough characters available to state the hazard, let alone provide meaningful and actionable information to the citizen as a part of that message. Brief messages supported by the current system such as "Wildland Fire in Your Area, Seek Safety" do not allow enough detail to tell the public whether to shelter in place or evacuate. If evacuation is needed, more specifics on travel routes, etc. need to be included in the message.

The unintended consequence of this shortfall is that, in the absence of complete information, the public is likely to ignore the message or may flood local 9-1-1 and dispatch centers with phone inquiries.

In my personal example, extended characters would have allowed the Alert Originator to indicate the location of the tornado and direction of travel.

III A 2 Classifying Emergency Government Information

This rule change will provide local government with the flexibility it needs to address critical local events that do not currently fall in the existing categories.

III A 3 Content in WEA alerts

Adding links and phone numbers are critical in allowing the Alert Originator to provide supplementary and graphical information to the public.

Additional content can assist the public in making personal safety decisions, while not clogging the 9-1-1 network with verification calls.

In my personal example, a link to a map showing the warning area and location of the tornado would have assisted me in making critical personal protective actions decisions.

III A 4 Providing Multilingual WEA Messages

Multilingual warning is important in our community, as we have a significant non-English speaking population.

III A 5 WEA Geo-Targeting

Of all the issues in this NPRM, the issue of geo-targeting deserves the most careful attention by the Commission. My community is extremely prone to flash flooding. We have a dense population of over one million individuals in our County. During a storm, dozens of flood prone areas near waterways may or may not be affected the specific event. Being able to target messages to an area near a specific waterway is critical if WEAs are to be used for alerting.

If a WEA is no more granular than the County borders, a "Flooding In Your Area, Move to High Ground" message could send more than a million individuals into a panic. Over-warning may also cause alerts to be ignored due to warning fatigue.

Conversely and very importantly, it appears that, under the current WEA implementation, the Alert Originator could specify a small warning area along a particular waterway. Depending on the cell carrier's configuration, the message may only be sent by cellular towers that are actually located in the warning area, rather than the tower(s) that serve the warning area. Waterways are in low-lying areas and cell towers are typically located at higher elevations. Under the current system, if there are no cell towers physically located in the warning area, the alert may **not be transmitted at all** by some carriers.

In my personal example, improved geo-targeting would have reconfirmed that I was in the warning area or would have helped avoid an unnecessary alert.