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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Comment on Proposed Rules Improving Wireless Emergency Alerts and Community-Initiated Alerting (PS Docket No. 15-91)

Dear Secretary Dortch:

In May 2015, the National Center for Missing & Exploited Children (NCMEC) provided detailed ex parte comments to assist the FCC Public Safety & Homeland Security Bureau with preliminary drafting of these proposed rules. Today, I submit the following additional Public Comments on behalf of NCMEC.

To date 794 abducted children have been safely returned specifically because of the AMBER Alert Program. Since the inception of the Wireless Emergency Alert program NCMEC has issued more than 300 Wireless Emergency Alert activations on behalf of AMBER Coordinators. The Wireless Emergency Alert message specifically has now been credited with the safe return of 25 of those children.

WEA Message Length and Content (Section III, A, 3)

To remain effective, each AMBER Alert issued must provide enough descriptive information to assist with the identification and recovery of an abducted child. For this reason NCMEC strongly supports the proposal to expand WEA message length to 360 characters. The current 90 character limit requires significant abbreviation and provides incomplete information, which may be confusing for some users. Under current limits a typical WEA message often does not have sufficient characters to provide any meaningful description of the child victim or abductor involved. For this reason, Wireless Emergency Alerts are typically only used for an AMBER Alert in which vehicle and license plate information is available. Expanding descriptions and providing more meaningful information may prompt an increased response from the public, especially WEA recipients who are not near a roadway or focused on vehicle information.

In addition to expanded length, NCMEC also strongly supports the proposal to allow URLs and telephone numbers in WEA messages. The potential to direct recipients to a website specifically used for AMBER Alert information would be very beneficial and may be the single most important possible enhancement at this time. NCMEC's own website enhances our ability to serve as the nation's clearinghouse on issues related to missing and sexually exploited children, connecting visitors with up-to-date information about current AMBER Alerts (<http://www.missingkids.org/AMBER>). Directing recipients to the AMBER Alert website through a URL included in the WEA message would allow any person continuous access to the most up-to-date information (including cancellations) without character limits, and help prevent the need to issue subsequent clarification WEA messages. Providing a telephone number for the public to contact with leads and information is standard for every other type of missing child alert, message, bulletin, notice, and poster that NCMEC disseminates.

Beyond text, NCMEC is acutely aware that photos fill a vital role in the search for missing children. Wherever possible, it is standard for NCMEC to include a photograph of the missing child for every other type of missing child alert, message, bulletin, notice, and poster that NCMEC disseminates. As noted in NCMEC's earlier comments, the vast majority of recent AMBER Alerts that contributed to the successful recovery of an abducted child featured license plate information or a photo of the child, or both. Although this same content could be provided without significant technical adjustments through text-only WEA messages that include a URL linked to the AMBER Alert website, NCMEC also supports the ability to add images, maps, or other multi-media content to WEA messages in the future, which also could greatly enhance the immediate usefulness of AMBER Alerts.

Improvements to WEA Geo-targeting (Section III, B)

NCMEC supports the proposal to allow (or require) more functional geo-targeting of alerts. Using technological improvements to carefully target missing child information is a common feature in NCMEC's existing programs and partnerships. Electronic service providers, social media companies, advertisers, corporate partners and thousands of individuals voluntarily receive and disseminate location-specific missing child information and photos from NCMEC on a daily basis. Through these networks, NCMEC can reach increasingly specific audiences to solicit help finding each missing child. AMBER Alerts are no different, although the critical nature of the child abduction involved and the potential for rapid movement may require AMBER coordinators to broadcast a more wide-reaching alert than some of the geocodes, circles, or polygons envisioned for other types of emergency alerts in the proposed rules.

Other Classes of Alerts (Section III, A, 2)

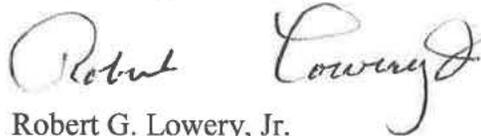
Although NCMEC's experience with the WEA system has so far been restricted to AMBER Alerts, it is worth noting that there may be other relevant, potential child-protection applications for WEA. In response to the request for comment, NCMEC respectfully suggests that it may be appropriate to explore another class or WEA alert type, for additional critical missing child scenarios that might not meet the specific requirements of an AMBER Alert.

For one example, NCMEC has gone to great lengths to raise awareness and educate first responders that children with special needs (in particular Autism) may have an increased tendency to wander or

elope from safe environments towards water or other potential hazards. When a child is missing under these circumstances the situation is very dangerous and can even be life-threatening, but unlike an AMBER Alert scenario there is no abductor involved and the child typically remains in a relatively close area traveling on foot. An additional classification or alert type under the WEA system would allow 911 dispatchers to disseminate a narrowly geo-targeted alert, in the type of small circle or polygon discussed in the rules proposal, to notify the local community of the missing child emergency. As with the proposed improvements to WEA geo-targeting overall, the goal would be to solicit a rapid public response to the emergency without over-alerting or causing alert-fatigue.

The National Center for Missing & Exploited Children is encouraged by the proposed rules and supports the effort to further improve the WEA system, enhance AMBER Alerts, and protect children.

Respectfully submitted,

A handwritten signature in black ink, reading "Robert Lowery, Jr." in a cursive style.

Robert G. Lowery, Jr.
Vice President, Missing Children Division
National Center for Missing & Exploited Children