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Public Comments on Improving Wireless Emergency Alerts and Community-Initiated Alerting, :=====

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Comment: See attached file(s)

See attached file(s)



MICHAEL R. PENCE, Governor  
STATE OF INDIANA

INDIANA DEPARTMENT OF HOMELAND SECURITY  
302 West Washington Street  
Indianapolis, IN 46204

January 12, 2016

VIA ELECTRONIC FILING

Ms. Marlene Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

Re: Improving Wireless Emergency Alerts and Community-Initiated Alerting; Public Docket 15-91

Dear Ms. Dortch:

The Indiana Department of Homeland Security (IDHS) is the Emergency Management Agency (EMA) for the State of Indiana. A significant portion of our mission is to provide our citizens with the most appropriate actionable information during large-scale emergencies. In addition, my office works closely with our county EMA Directors to assist them to provide these services to their citizens.

Thank you for the work the FCC has coordinated in the preparation of these proposed rulemaking procedures and the opportunity to comment on them.

Please find my comments below my signature.

Best Regards,

A handwritten signature in black ink, appearing to read "Don West", with a long horizontal flourish extending to the right.

Don West  
IDHS Communications Director  
State NAWAS Coordinator  
State IPAWS Coordinator 3

### **Assumption**

The proposal includes a significant number of proposed changes to the regulations. Many, if not all, will have interactive effects on other aspects of the WEA process in implementation. For example, the adoption of the “allowing URLs” could often reduce the need for the increase in the allowable number of characters to 360 in a WEA. Likewise the adoption of the “Emergency Government Information” proposal could make the limit of 360 characters too few to be effective and efficient. Submitting comments on every possible combination of the final rule making would be confusing and counterproductive.

These comments are based on the assumption all of the proposal items listed below, will be approved and adopted by the FCC.

### **III. A-1 Increasing Maximum WEA Character Length**

While 360 characters may not be the optimal length, 90 characters is insufficient space to convey the necessary information to inform the public of the nature of a threat and the appropriate course of action necessary to preserve and protect life and property. 360 characters seem to be a good first step in the compromise between the inclusion of every necessary detail and the attention span of the public in a threatening situation.

While troublesome for authorized alerting agencies, the elimination of 90 character WEAs *at this time* is a concern for some of our most vulnerable citizens. The establishment of a date for the discontinuation of the 90 character format would be more equitable based on the relatively short life-span of most cellular devices. The ability to send multiple 90 character WEAs in the interim would be a workable solution from the alerting agency’s perspective.

### **III. A-2 Classifying Emergency Government Information**

The ability to notify the public of appropriate actions in order to protect life and property is critical to the core missions of emergency management agencies. The first three priorities of emergency response are, life saving, life sustainment, property and environment protection. The comments of CSRIC IV with respect to the definition of appropriate emergency information; “Emergency Government Information message should only be used to provide information to assist citizens regarding actions to take resulting from an imminent threat to life and property.”, defines “Government Information” in such a way which will allow emergency management agencies to address the “life sustainment and protection of property and the environment” aspects of the response.

Permitting the use of Government Information WEAs for traffic information or school closings, will desensitize the public or cause them to “opt out”, thus defeating the intent of the program.

Limiting the ability to issue "Emergency Government Information" WEAs to government emergency response agencies will better insure these WEAs are not over used.

With respect to the "opt-in/opt-out" issue; providing citizens with the ability to receive these messages and opt out, if they so choose clearly is a more safety oriented position than the reverse and would likely be better received by the majority of subscribers.

### **III. A-3 Content in WEA Alerts**

Clearly the ability to provide additional information and content with respect to an alert or warning is advantageous to the emergency management community. The ability to provide pictures, maps, and other media forms can significantly clarify critical information in a way which text can never duplicate. This could take the form of embedded URLs, telephone numbers or content included with the WEA. For example, a picture of a missing child associated with an AMBER alert could easily increase the useful reports from the public and reduce the number of false leads.

The ability for emergency management agencies to receive real-time data from specific geographical areas would greatly enhance the ability of these agencies to gage the scale of the needs in an emergency and better calculate the strength and numbers of forces needed to appropriately respond.

While the concern of the CSRIC IV about the practicality of multi-media WEAs may be valid, considering the numbers of photos, videos, and audio files which are presently transmitted over the cellular system AND the fact the WEA uses broadcast technology as opposed to sending the message individually to each device.

### **III. A-4 Providing Multilingual WEA Messages**

While the emergency management community as an obligation to serve non-English speakers as well as English speakers, the practicality of meeting this obligation varies widely by location. A practical solution might be to establish a level of non-English speakers in the US population at which cellular providers would be required to make text message accommodations. If approved, the use of embedded URLs could be employed to accommodate local variances in the populations of non-English speakers to provide translated information.

### **III. B. Other approaches to improve geo-targeting, including device-based geo-targeting solutions**

Finer resolution than an entire county would give emergency managers an opportunity to avoid significant alert-fatigue among the public from alerts and warnings which do not apply to them, while avoiding alerting members of the public which may actually contribute to worsening the emergency. Active shooter situations would be a prime example. Until there is some resolution

of the cause of the alert, first responders and potential victims may be better served by an alert which is geographically limited to the immediate area.

### **III. C-1 WEA Testing and Proficiency Training**

The ability to test any communications system is critical to insuring the reliability and functionality of the system during real emergencies. This is particularly true of a system intended for public alerts and warnings.

Delaying test alerts for any reason (other than interference with real alerts), defeats the purpose of the test and should be avoided. Allowing the public to opt-out is a better option than requiring them to opt-in to receiving test alerts. This may change at some future date when the reliability and accuracy of the alerting system is proven and the public is fully aware of the system operation and capabilities.

The frequency which test alerts should be permitted may also change with the future maturity of the system. At this time, once or twice per year should be adequate, however some areas with higher threat levels should be allowed to seek waivers from the FCC in order to conduct more frequent testing.

### **III C-2 Requiring Alert Logging and Test Reporting**

Equally important to any testing program is the analysis of the results. In addition, both the errors and success of all alerts and warnings should be available to all "Authorized Alerting Authorities", if not for all alerts, for those in the jurisdiction for which they are authorized to issue alerts.