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The Maryland Emergency Management Agency (MEMA) is in support of improving wireless emergency alerts (WEA) through the continued use of the Integrated Public Alert & Warning System (IPAWS) as the FCC has outlined in its filing of docket #15-91. While the FCC has outlined several important updates that it will be considering in the proposed rulemaking, we would like to provide comment on several key areas that are of the highest importance.

As the agency responsible for the activation of the Emergency Alert System (EAS) in Maryland, the most notable improvement that should be allowed is the increase in character length for a WEA message from its current limitation of 90 characters to the FCC's proposed 360 characters. In 2008, when this rule was first implemented, cell phones and other devices could only support the shortened message lengths and sending a longer message was not practical. Fast forward to 2016 and consider the current technologies available and how they allow for a much greater interaction from users in regards to its capabilities. Mobile devices today are far beyond where they were eight (8) years ago and by increasing the message length, we can give the public a better chance at being safe by providing them concise information and sufficient detail. By tripling the character length, we could possibly be tripling the number of lives saved in an emergency.

With the increase in message length, another key component that should be considered is the allowance of certain content for a WEA message to improve life safety. Phone numbers and web URLs would be of a great importance as it allows the public another resource to seek assistance in times of emergencies. As mentioned above, the technology that people hold in their hands allows them access to the Internet from almost anywhere and gives them access to potentially lifesaving information in greater detail.

In addition, MEMA also sees added value in a WEA test code as an available option for alert originators. At this time, other than the required monthly test (RMT) for EAS, there are no other routine tests being completed for system readiness or validation of staff competencies on equipment and practices. Having a test code and being able to practice these public warning skills will allow for the greater chance of a successful message going out in a time of crisis. Through this testing, there should also be careful consideration to adopting a requirement for logging and reporting on the IPAWS and WEA systems for actual alerts sent and tests performed. By having this information available, it will allow for greater enhancements in the future.

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Although we only commented on a few of the items being considered in the docket, MEMA is in full support of all items being proposed. The topics we mentioned are the most important and should be considered as a priority for implementation.

Thank you for your consideration.

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