

Via FCC Electronic Comment Filing System  
Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Re: Wireless Emergency Alerts (WEA) – Proceeding 15-91

Dear Ms. Dortch:

The Weather Company recognizes WEA as an important notification tool in our nation's larger warning network. The WEA system is trusted by citizens as an instrumental "bell ringer" service that notifies them of life-saving warnings. TWC would like to thank the FCC for its leadership in this Notice process to evaluate opportunities to improve WEA by utilizing the advances in weather-related warning capability, social science messaging, wireless technology, mobile device technology, and the enterprise of third party applications, internet, television, and radio that have become a standard routine for citizens to receive the emergency alert information.

While there have been technological advances possible for updates in WEA messaging, there should be consideration for what enhancements are necessary, possible to implement in a timely manner, and remain true to Congress' intent for WEA. In regard to the latter, WEA is one of several information paths, and not a full source of emergency information<sup>1</sup>.

WEA complements these other dissemination methods by providing a concise, geographically targeted message to get the public's attention and provide immediate instructions to those in the affected area. Citizens can then follow their standard practice to access other information sources on apps, Internet, television, and radio for more detailed information. Per the Executive Order 13407 and WARN Act, the variety of communications technologies have continued to develop many communication pathways for citizens to receive alert messages and we continue to look for ways to be a partner in this effort to protect life and property of our nation's citizens.

To facilitate the FCC's review, our comments are organized by the sections of the FCC proposal.

#### A. WEA Messaging

##### **1. Increasing Maximum WEA Character Length**

*FCC proposes expanding the WEA message length from 90 to 360 characters*

TWC supports the Notice's proposal to increase WEA message length to 360 characters for 4G capable devices while maintaining the existing 90-character messages for 2G and 3G devices, and the use of CAP standards in the WEA messages. However, we would note from our experience, longer messages may not result in better communication of necessary information to users. Concise and actionable information increases user response.

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<sup>1</sup> [The NAS shall "alert the public to any imminent threat that presents a significant risk of injury or death to the public..." Warning, Alert, and Response Network Act ("WARN Act"), Pub. L. No. 109-347, §603(a) (2006) at Section 2(b). Executive Order 13407 called for a "secure delivery of coordinated messages to the American people through as many communication pathways as practicable..." Executive Order 13407—Public Alert and Warning System (June 26, 2006) Section (2)(a)(i). See also, WARN Act, Pub. L. No. 109-347, §603(a) (2006) at Section 2(b)(4). [NAS] will transmit alerts across the greatest possible variety of communications technologies, including digital and analog broadcasts, cable and satellite television, satellite and terrestrial radio, wireless communications, wireline communications, and the Internet to reach the largest portion of the affected population.]

## **2. Classifying Emergency Government Information**

*FCC proposes adding a new WEA category titled “Emergency Government Information” for non-emergency type messages (i.e. boil water, shelter locations)*

TWC supports the use of new categories that may help distinguish the alert types and clarify to users when they select to turn on or off each of the alert categories. TWC supports citizen education and use of PSAs to build awareness of the alert categories and each user’s ability to select their alert notification preferences. With additional alert types, action should be taken to guard against users completely disassociating (i.e., turning OFF WEA alerts). TWC recommends providing additional categories and having alerts be turned OFF by default instead of all being automatically turned ON. Enabling users to make their own choice about the WEA alert settings, users may be more inclined to keep these ON instead of turning all alerts OFF because they were not given the ability to initially select their preference.

## **3. Content in WEA Alert**

*FCC proposes allowing URLs and telephone numbers in WEA messages that were previously prohibited*

TWC recommends the Commission’s continued evaluation of including embedded Uniform Resource Locators (“URLs”) or other multimedia content in WEA messages and discussion with network carriers who can determine if there will be a significant and detrimental impact to the network from this additional network congestion during severe events. While providing additional data including images, maps and multimedia may provide more details to users; this type of additional information is currently available to users by third party apps and television that users normally use.

## **CONCLUSION**

TWC supports the interest of utilizing technological and social advances to better provide alert messages to citizens. TWC urges the Commission to recognize the role of WEA as a “bell ringer” service to alert the public, and the national enterprise of additional sources of information that have now become the standard routine for citizens to receive more detailed information beyond the initial alert. We believe that WEA should not be burdened with an expanded mission that may not be necessary because of the existence of other communication pathways.

Respectfully submitted,  
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