

FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
)  
Improving Wireless Emergency Alerts and ) PS Docket No. 15-91  
Community-Initiated Alerting )

**REPLY COMMENTS TO THE NOTICE OF PROPOSED RULEMAKING**

**Telecommunications for the Deaf and Hard of Hearing, Inc.  
National Association of the Deaf  
Deaf and Hard of Hearing Consumer Advocacy Network  
Deaf/Hard of Hearing Technology RERC  
Hearing Loss Association of America  
Association of Late-Deafened Adults, Inc.  
Cerebral Palsy and Deaf Organization  
Deaf Seniors of America  
California Coalition of Agencies Serving the Deaf and Hard of Hearing**

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Dated: February 12, 2016

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## SUMMARY

The Consumer Groups, representing the interests of individuals who are deaf, hard of hearing, deaf-blind, and deaf with mobility issues, urge the Commission to respond to the widespread recognition revealed in the comments that improvements and refinements to the WEA system are necessary and appropriate and should be made. In considering these changes, the Consumer Groups request that the Commission consider the special perspective and needs of individuals who are deaf or hard of hearing. For that community, WEA messaging is an indispensable public safety and potentially life-saving tool which provides access to an immediately available and reliable form of written emergency communications oftentimes more effective for emergency purposes than television or radio broadcasts or other forms of emergency notifications that benefit hearing individuals.

Given the vital role that WEA messaging plays for the deaf and hard of hearing community, the Consumer Groups strongly support Commission action to adopt rule changes aimed at enabling more information in WEA messages to enhance the quality and utility of WEA messages. The Consumer Groups disagree with some parties' view that the proposed changes would fundamentally alter the nature of WEA messaging as an alert-only mechanism rather than a source of comprehensive information regarding public safety conditions and events.

In particular, the Commission should proceed with increasing the maximum WEA character length as proposed and add a new category of "Public Safety Message" Alerts. Given time and technology advancements, the Commission should also proceed to allow embedded URLs, multilingual capabilities, and telephone numbers, in WEA messages – features that are routinely available today for a wide range of notifications in the private commercial world. Incorporating this content is technically feasible and does not present a risk of network

congestion significantly different from the congestion that arises with all emergencies and that potentially can be managed through focusing consumer response and utilizing updated network management technologies. In light of current technical barriers to multimedia links, the Commission should direct further study on how best to achieve that WEA enhancement and revisit the issue in 18 months. Requirements to update and upgrade testing and proficiency training at all levels – federal, state, local and U.S. Territories – while actively involving members of the deaf and hard of hearing community should also be adopted. Finally, the Consumer Groups recommend a reporting system that would allow deaf and hard of hearing individuals to provide feedback to federal, state and local agencies on accessibility concerns. Such feedback, and any solutions developed, should be shared among all agencies and the agencies should report on the status of all measures planned or implemented to address such concerns in a bi-annual update.

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**California Coalition of Agencies Serving the Deaf and Hard of Hearing**

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), through its undersigned counsel, National Association of the Deaf (“NAD”), Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”), Deaf/Hard of Hearing Technology RERC (DHH-RERC), Hearing Loss Association of America (“HLAA”), Association of Late-Deafened Adults, Inc. (“ALDA”), Cerebral Palsy and Deaf Organization (“CPADO”), Deaf Seniors of America (“DSA”), and California Coalition of Agencies Serving the Deaf and Hard of Hearing (“CCASDHH”) (collectively “Consumer Groups”) hereby respectfully submit these reply comments in the above-referenced proceeding.<sup>1</sup> In Comments, the Consumer Groups, representing the interests of individuals who are deaf, hard of hearing, deaf-blind, and deaf with mobility issues, expressed strong support for specific measures proposed in this proceeding that

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<sup>1</sup> *In the Matters of Improving Wireless Emergency Alerts and Community-Initiated Alerting*, Notice of Proposed Rulemaking, PS Docket No.15-91 (rel. November 19, 2015) (“NPRM”).

will update and improve the WEA system in order to enhance the clarity and utility of WEA messaging, including by incorporating evolving technologies and developments in the way the public uses mobile services today.<sup>2</sup> The Consumer Groups explained that for deaf and hard of hearing individuals, WEA messaging is an indispensable public safety and potentially life-saving tool which provides access to an immediately available and reliable form of written emergency communications oftentimes more effective for emergency purposes than television or radio broadcasts or other forms of emergency notifications that benefit hearing individuals.<sup>3</sup> Given the vital role that WEA messaging plays in the deaf and hard of hearing community, the Consumer Groups reiterate their request that the Commission consider the perspective and needs of this community in the development and implementation of specific Commission proposals.

#### **I. The Commission Should Adopt Changes to Update and Upgrade WEA Messaging**

The Comments revealed widespread recognition that improvements and refinements to the WEA system are necessary and appropriate and should be made. Comments from the public safety and first responder community and other organizations that rely on WEA messaging to distribute emergency alert information all described the essential role that the WEA system plays.<sup>4</sup> The International Association of Fire Chiefs (“IAFC”) affirmed that “[T]he WEA system is a key emergency management tool.”<sup>5</sup> NOAA declared that “WEA is an important life serving

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<sup>2</sup> *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of the Consumer Groups (Jan. 13, 2016) (“Consumer Group Comments”).

<sup>3</sup> *Id.* at 3.

<sup>4</sup> *See Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of the Association of Public-Safety Communications Officials-International, Inc. (Jan. 13, 2016) (“APCO Comments”); *see also Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of the FEMA Integrated Public Alert and Warning System (IPAWS) Program Management Office (PMO) (Jan. 13, 2016) (“IPAWS PMO Comments”).

<sup>5</sup> *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, at 2, PS Docket No. 15-91, Comments of the International Association of Fire Chiefs (Jan. 6, 2016) (“IAFC Comments”).

tool that makes up part of our nation’s larger warning network.”<sup>6</sup> Virtually all parties supported a variety of necessary changes to update and improve the usefulness of WEA messaging.

However, a number of telecommunications carrier interests urged the Commission not to pursue significant upgrades or to limit improvements cautioning that some changes could entail new standards, and/or require time and financial resources.<sup>7</sup> Several carriers reiterate that the WEA should be seen only as a highly limited, simple “ring the bell” system and oppose certain proposed upgrades that they argue are unnecessary and burdensome in the context of this limited system.<sup>8</sup> In a turnabout from their usual spirited advocacy for, and avowal of, rolling out advanced mobile service features to the consuming public,<sup>9</sup> those interests urged the Commission to refrain from incorporating a number of advancements in WEA messaging, even where such advances would be important to provide additional critical – often life-saving – information to consumers in an emergency.<sup>10</sup>

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<sup>6</sup> *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of NOAA/National Weather Services at 1 (Jan. 13, 2016).

<sup>7</sup> *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of Sprint (Jan. 13, 2016) (“Sprint Comments”) (Commission’s proposals would fundamentally alter the existing WEA system); *see also* *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of AT&T Services, Inc. (Jan. 13, 2016) (“AT&T Comments”) (FCC should not overburden WEA with new rules, but instead should allow local media to carry emergency alerts or provide further instructions to recipients who tune in to seek that information); *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of Verizon, at 1, 14 (Jan. 13, 2016) (“Verizon Comments”) (Commission should avoid more burdensome requirements that complicate the WEA system).

<sup>8</sup> *See, e.g.*, AT&T Comments (WEA is a “bell ringer” service meant to get the attention of members of the public so that they can seek additional sources of information); *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of CTIA – The Wireless Association (Jan. 13, 2016) (“CTIA Comments”) (Commission should be “mindful of WEA’s success as a “bell ringer” service.”); *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of the Alliance for Telecommunications Industry Solutions (Jan. 13, 2016) (“ATIS Comments”) (WEA notifications are designed to alert subscribers to emergencies and provide immediate instructions, not to be comprehensive sources for all emergency information).

<sup>9</sup> *See, e.g.*, CTIA – The Wireless Association, *The Next Generation of Wireless: 5G Leadership in the U.S.* (2015) (“CTIA 5G Report”) (Next-generation wireless technology will “transform entire industries” to be more capable, efficient, and intelligent. Policymakers play an important role in advancing 5G technology, and must go beyond a light-touch, investment friendly regulatory approach.).

<sup>10</sup> *See, e.g.*, T-Mobile Comments at 2 (“... opposing proposals to incorporate URLs, pictures, or multimedia into WEA messages arguing that such requirements would adversely impact network capacity and performance during emergencies.”).

The Consumer Groups do not share the view that the proposed changes, individually or collectively, if adopted, would fundamentally alter the nature of WEA messaging as an alert-only mechanism rather than a source of comprehensive information regarding public safety conditions and events. While the Consumer Groups recognize that the Commission should avoid rule changes that impose unreasonable technical, financial or other burdens on carriers, broadcasters, or manufacturers, it does not serve the public interest to disregard sensible improvements that enhance the utility of WEA messaging – especially for the deaf and hard of hearing community – or otherwise freeze the state of development of WEA. Accordingly, the Commission should scrutinize claims of technical or financial hardship and balance any added effort or resources required by rule changes with the important public safety concerns at stake before it decides to pass on the opportunity to enhance the WEA system in a way that takes full advantage of technical advancements and better meets today’s needs for emergency messaging.

## **II. The Comments Showed Widespread Support for Increasing Maximum WEA Character Length**

The Consumer Groups supported the Commission’s proposal to expand the character limit from 90 to 360 characters of alphanumeric text where technically feasible (while continuing to allow the delivery of 90-character messages on 2G and 3G networks and devices) as recommended by CSRIC IV.<sup>11</sup> For the deaf and hard of hearing community, written WEA messages to user mobile devices provide the most reliable, convenient, and accessible source of timely and accurate emergency information. Increasing the number of allowable characters will greatly enhance the value of this important service by enabling those who are deaf and hard of

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<sup>11</sup> Consumer Group Comments at 4. With respect to the expanded information that could be made available under a 360 character limit, the Consumer Groups suggest that alert originators be encouraged to include key information in the opening part of the message -- what, when, where, risk, advised response -- and to use other parts of the message to clarify or supplement the key information. *Id.* at 5.

hearing to obtain more extensive emergency information without delay or the need to take further steps to seek out clarifying information with respect to the nature of the emergency or relevant instructions on response.

A majority of commenting parties agreed. FEMA’s Integrated Public Alert and Warning System Program Management Office (“IPAWS PMO”) supports expanding the WEA message length limit because longer messages are more likely to contain “sufficient information to overcome people’s pre-alert and warning event perceptions of different hazards . . .”<sup>12</sup> The National Center for Missing & Exploited Children (“NCMEC”) strongly supports the proposal to expand WEA message length in order to ensure that each AMBER Alert issued provides enough descriptive information to assist with the identification and recovery of an abducted child.<sup>13</sup> Similarly, IAFC strongly supports expanding the maximum permissible length of WEA messages in order to allow for “better, more detailed information in each alert and [to] reduce the total number of alerts needed to adequately notify our citizens of an emergency.”<sup>14</sup> Carrier interests represented by AT&T, Verizon, Sprint, T-Mobile, CTIA as well as ATIS all support the proposal.<sup>15</sup> Given the near consensus on this point, the Commission should adopt its proposal to expand the permissible length of WEA message.

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<sup>12</sup> IPAWS PMO Comments at 1-2.

<sup>13</sup> *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of the National Center for Missing and Exploited Children, at 1-2 (Jan. 13, 2016) (“NCMEC Comments”).

<sup>14</sup> IAFC Comments at 1.

<sup>15</sup> AT&T Comments at 2; Verizon Comments at 6-7 (Commission should expand the allowable WEA character limits to 360 characters for messages on LTE networks and on devices first offered to consumers...); Sprint Comments at 3-4 (“...it may be appropriate to expand the maximum permissible length of WEA messages for LTE technologies.”); CTIA Comments at 5 (“...CTIA supports the Commission’s proposal to expand the maximum WEA message length to 360 characters where technically feasible...”); ATIS Comments at 3; *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of T-Mobile USA, Inc., at 3-4 (Jan. 13, 2016) (“T-Mobile supports expanding the maximum permissible length of WEA messages from 90 to 360 characters of alphanumeric text supports expanded WEA messages for 4G LTE and future network technologies.”).

### III. The Commission Should Add a New Class of Alert for “Emergency Government Information” or “Public Safety Messages”

Commenters also shared the Consumer Groups’ support for the addition of a fourth class of alerts to encompass "Emergency Government Information" in all levels of government including federal, state, and local as well as U.S. territories.<sup>16</sup> AT&T, CTIA and APCO support the proposed new class of alerts.<sup>17</sup> IPAWS PMO supports a new category but suggests that it be called “Public Safety Message.”<sup>18</sup> Verizon suggests that the FCC consider whether existing codes are sufficient.<sup>19</sup> To reduce the time needed for the development of new technical standards, software and hardware, ATIS cautioned that any new categories should be “supported within the existing WEA capabilities, event codes, alert classes, cell broadcast message IDs, and subscriber opt-out capabilities.”<sup>20</sup>

The Consumer Groups agree with IPAWS PMO that the shorter, more generic “Public Safety Message” would be an immediately understandable, clear replacement for the existing longer Alert name. The Consumer Groups also acknowledge the questions raised by Microsoft<sup>21</sup> and ATIS<sup>22</sup> regarding whether it is necessary to apply the extreme WEA disruptive model to messages in any new Alert category and agree that it may not be necessary to incorporate new

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<sup>16</sup> WEA rules currently provide for three classifications of WEA messages: “Presidential Alerts, Imminent Threat Alerts, and the AMBER alerts.” The NPRM proposes to add a new category of permissible alerts “Emergency Government Information” for essential public safety advisory that prescribe one or more acts likely to save lives and/or safeguard property during an emergency, such as “boil water” advisories and messages identifying shelter locations in the event of long term or severe flooding, hurricanes, or tornados. *NPRM* at para. 18.

<sup>17</sup> AT&T Comments at 2; CTIA Comments at 2, 10-11; APCO Comments at 5.

<sup>18</sup> IPAWS PMO Comments at 2 (although a new WEA message class should be added, the “Emergency Government Information” title is vague and could be confusing when compared to the “Imminent Threat” class as descriptive title “Public Safety Message is recommended”).

<sup>19</sup> Verizon Comments at 10.

<sup>20</sup> ATIS Comments at 6.

<sup>21</sup> *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of Microsoft Corporation, at 4 (Jan. 13, 2016) (“Microsoft Comments”) (“To prevent users from turning off the alerts altogether in order to minimize disruption, rules governing new WEA alert types (or standards that they incorporate) should define whether standard messaging notification models are acceptable or whether the extreme WEA disruptive model is required.”).

<sup>22</sup> See ATIS Comments at 6-7 (any new WEA categories should be supported within existing WEA capabilities, event codes, alert classes, cell broadcast message IDs, and subscriber opt-out capabilities).

WEA capabilities to implement a new Alert category. As outlined in the comments, the Consumer Groups support rules that encourage WEA messages to be distributed via text and/or video, when implemented, in American Sign Language (ASL) to provide better accessibility to emergency messaging to those individuals in the deaf and hard of hearing community who use sign language.<sup>23</sup>

#### **IV. WEA Alert Content Should be Expanded to Include Telephone Numbers, Multilingual Communications and URLs; The Commission Should Direct More Study of Multimedia Links in WEA Messaging**

Perhaps the proposal eliciting the most disagreement is the proposal to enable consumers to access more information through WEA messages by incorporating URLs and telephone numbers, as well as interactive links, multimedia alerts, and multilingual communications. Consumer Groups voiced strong support for rules that enable more information in WEA messages to enhance the quality and utility of WEA messages as an essential means of distributing emergency information to the deaf and hard of hearing community.<sup>24</sup> Enabling URLs, interactive links, and telephone numbers, in particular, in WEA messages will provide immediate access to additional information such as details of location, status of the emergency, response guidance, and emergency contact telephone numbers.<sup>25</sup> The immediate access to further detail provided by simply embedding the access or contact information in a WEA message can save precious time necessary to avoid imminent danger.

The deaf and hard of hearing community will especially benefit from having convenient, direct access to URLs and even telephone numbers in the context of the written message that will

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<sup>23</sup> See *Consumer Group Comments* at 6. The Consumer Groups recommended that this service be provided on an “opt-out” basis to ensure that the availability of the service is widely known. Those who do not wish to get this service in ASL should be able to opt-out with a simple and convenient selection.

<sup>24</sup> We noted that airlines, telephone carriers, healthcare service providers, restaurants and many applications normally provide access to embedded numbers and URLs in their communications. *Id.* at 6.

<sup>25</sup> The Consumer Groups recommend that the Commission encourage message originators to utilize simple, easily-remembered URLs that make it easy for recipients to view those resources on alternate platforms. *Id.* at 7.

often be the principal means of obtaining emergency news and instructions. Interactive links would also provide another alternative channel for deaf and hard of hearing individuals to seek assistance from and provide directions to emergency responders. Time is of the essence in any emergency situation, and every delay avoided in taking responsive action could mean the difference between life and death.

Many commenting parties are in agreement that enabling more content in WEA messages will significantly improve the utility of WEA messages and deliver important public safety benefits.<sup>26</sup> However, carrier and network interests raised concerns that the convenient access provided by expanding the content in WEA messages would promote congestion and undermine network performance.<sup>27</sup> Many carrier interests specifically oppose inclusion of URLs, multimedia links, multilingual messages (beyond Spanish) and even telephone numbers reasoning that network congestion would result if consumers were provided convenient access to other information sources.<sup>28</sup> Relying on its 2015 “Feasibility Study” which reports concerns about WEA messaging, ATIS surmises that embedding URLs may create congestion from simultaneous attempts at accessing content via the URL, which, if it were to occur, would slow response time and prompt retries.<sup>29</sup> With respect to the impact on WEA messages, the ATIS

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<sup>26</sup> See, e.g., APCO Comments at 6 (“...enhancing WEA could reduce unnecessary 9-1-1 calls and enable more informed and focused 9-1-1 calls to PSAPs. The inclusion of embedded references would permit public safety alert originators to incorporate by reference more information, such as specific guidelines or multimedia contained on their websites, and thereby make more effective use of WEA.”).

<sup>27</sup> See, e.g., T-Mobile Comments at 6 (adding these types of content would create significant network performance issues and inhibit ability of message recipients to contact authorities); see also Sprint Comments at 7 (allowing other forms of multimedia content would raise same concerns that apply to use of URLs, including potential network congestion problems and security issues).

<sup>28</sup> See Verizon Comments at 8-9 (“proposal to allow embedded URLs or phone numbers, risks congesting networks and harming consumers’ experience and participation.”); Sprint Comments at 2 (allowing embedded URLs will cause significant congestion.”). ATIS also expressed concern that providing access to web content through WEA messaging raises cybersecurity concerns that will need to be addressed. ATIS Comments at 7-8; see also Sprint Comments at 6-7 (embedded URLs could introduce security issues by potentially opening networks up to viruses and other unintended embedded content.).

<sup>29</sup> ATIS Comments at 7 (“The server to which the URL points could also be overloaded, resulting in the inability of the subscriber to access the intended information.”).

Feasibility Study states that the “primary impact of including a URL in a WEA text alert message is that it will use up part of the character limit available for WEA text message content. It will be up to the Alert Originators to ensure that the URL length can fit within a single WEA text message alert as well as allows sufficient space for the text message content.”<sup>30</sup>

The Consumer Groups urge the Commission to modify the rules to upgrade WEA message content to incorporate URLs, multilingual capabilities, and telephone numbers, steps that are routinely taken today for a wide range of notifications in the private commercial world. Providing a more convenient means of accessing relevant emergency information through the embedded URLs may increase the amount of congestion somewhat but would provide access to critical information in a more timely and user-friendly manner, a particular benefit for deaf and hard of hearing individuals who do not have access to all resources for emergency information.<sup>31</sup>

The Consumer Groups note that network congestion in times of emergency is always present given the public’s need to communicate with family and friends and to obtain accurate information relating to the emergency -- a situation that will not significantly change if expanded content is permitted as recommended above. Network congestion is a global issue that carriers have been working on for multiple years and much progress continues to be made. It is the Commission’s role to develop forward-looking regulations with reasonable actions that enhance the WEA’s utility as an alert tool and keeps pace with evolving technologies. The Consumer Groups agree that the proposal to permit embedded URLs, multilingual capabilities and telephone numbers is appropriate given the “advancement of time and technology since the

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<sup>30</sup> Alliance for Telecommunications Industry Solutions (ATIS), *Feasibility Study for WEA Supplemental Text*, at para 5.5.3 (2015) (“ATIS Feasibility Study”).

<sup>31</sup> For instance, NAB and PBS state that FM radio chips will provide ready access that relieves network congestion but FM radio not an information source accessible to the deaf and hard of hearing community. *Improving Wireless Emergency Alerts and Community-Initiated Alerting*, PS Docket No. 15-91, Comments of the National Association of Broadcasters and National Public Radio (Jan. 13, 2016) (“NAB/PBS Comments”).

adoption of the WEA rules”<sup>32</sup> and the potential for carriers to address any congestion concerns by focusing consumer response and utilizing today’s network management technologies. Although the carriers have not yet embraced this expanded content, these changes are technically feasible and will help to drive the carrier industry forward to achieve improvements in alert quality and accessibility.

However, given technical feasibility concerns identified in the ATIS Feasibility Study and in the comments with respect to incorporating multimedia links,<sup>33</sup> the Consumer Groups recommend that the Commission promote further technical study and development of technical recommendations on the proposal to incorporate multimedia links in WEA messaging. The Consumer Groups recommend that the Commission revisit the issue of whether multimedia links should be incorporated in WEA messaging in the near future (*e.g.*, eighteen months.)

## **V. WEA Testing and Proficiency Training**

The Commission recognizes in the NPRM that since the deployment of WEA in 2012, “the system has grown, technology has changed, and new community-based alert initiators have begun to use WEA to address the safety needs of their communities.”<sup>34</sup> WEA provisions for testing and proficiency training should be reevaluated and updated to match today’s use and expectations of the WEA system. To that end, the Consumer Groups reiterate their support for testing and training for future alerts at all levels -- federal, state, local and U.S. Territories -- and the adoption of technical standards and processes that would be necessary to facilitate such

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<sup>32</sup> NPRM at para. 25.

<sup>33</sup> See ATIS Feasibility Study at 8-9 (identifies technical limitations in using evolved Multimedia Broadcast Multicast Service in LTE (eMBMS)); see also AT&T Comments at 3 (inclusion of multimedia content or graphic content like maps in WEA alerts is not feasible because multimedia is not supported by existing cell broadcast technology.). To the extent that WEA messages are able to be distributed via video, Consumer Groups propose that such messages include ASL in order to ensure the widest reach to the deaf and hard of hearing community. We note that providing access to ASL should not raise additional congestion concerns because not all consumers will access ASL messages.

<sup>34</sup> NPRM at para. 43.

testing. The Consumer Groups express no opinion regarding specific proposals and recommendations raised in the comments other than to urge that those responsible for testing and training be directed to include ample representation from the deaf and hard of hearing community in these efforts. Only from actively involving members of this community in the processes can responsible parties become more familiar with and sensitive to our needs and concerns with respect to the WEA system and messages.

## **VI. Requiring Alert Logging and Test Reporting**

With respect to whether Participating CMS Provider Alert Gateways should track and log WEA messages and system performance statistics and whether originators should be directed to issue a report and, if so, what information should be evaluated, the Consumer Groups recommended a reporting system that would allow deaf and hard of hearing individuals to provide appropriate information to federal, state and local agencies on accessibility concerns.<sup>35</sup> Such a process is necessary to address the unique emergency alert and safety concerns of this community. Feedback information should be shared among involved agencies as well as any design solutions that address the concerns raised so that the WEA system at all levels can benefit from this feedback. Providing for such a direct and focused channel of communications about the specific concerns and impact of the WEA system performance on the deaf and hard of hearing community will enable federal, state and local alert originators to improve the responsiveness of the system to these concerns and promote the widest possible community participation. The Consumer Groups reiterates its recommendation that accountability and continued progress be fostered by requiring involved agencies to release a report bi-annually that discusses feedback from the deaf and hard of hearing community and the measures planned or implemented to address concerns raised.

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<sup>35</sup> Consumer Group Comments at 11.

## VII. CONCLUSION

The Consumer Groups respectfully submit that rule modifications that reflect the changes outlined above are necessary to achieve the Commission's overarching public interest goals in this proceeding and to address the unique concerns of, and improve the efficacy of WEA for, individuals who are deaf, hard of hearing, deaf-blind, and deaf with mobility issues.

Respectfully submitted,

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### **Hearing Loss Association of America**

Contact: Lise Hamlin, Director of Public Policy • LHamlin@hearingloss.org  
7910 Woodmont Avenue, Suite 1200, Bethesda, MD 20814  
[www.hearingloss.org](http://www.hearingloss.org)

**Association of Late-Deafened Adults, Inc. (ALDA)**

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8038 MacIntosh Lane, Suite 2, Rockford, IL 61107  
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**Cerebral Palsy and Deaf Organization**

Contact: Mark Hill, President • president@cpado.org  
12025 SE Pine Street, Apt. #302 Portland, OR 97216  
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**Deaf Seniors of America**

Contact: Nancy B. Rarus, President • nbrarus1@verizon.net  
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**California Coalition of Agencies Serving the Deaf and Hard of Hearing**

Contact: Sheri Farinha, Chair • sfarinha@norcalcenter.org  
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