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March 2, 2016

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

Re: Notice of *Ex Parte* Presentation (PS Docket No. 15-91)

Dear Secretary Dortch:

On February 29, 2016, staff from the National Center for Missing & Exploited Children (NCMEC) met with several employees of the FCC Public Safety & Homeland Security Bureau to provide comments and discuss questions relevant to the AMBER Alert program, as it relates to the Notice of Proposed Rule Making and improvements to the Wireless Emergency Alert (WEA) system. Each individual attending the meeting in-person or via teleconference is identified below, and a detailed summary of the discussion follows.

FCC Public Safety and Homeland Security Bureau participants:

James Wiley  
Zenji Nakazawa  
Gregory Cooke  
Carolynn Shillingburg  
Rasoul Safavian  
Behzad Ghaffari  
Yoon Chang

NCMEC participants:

Robert Hoever, Missing Children Division  
P. Michael Murphy, Missing Children Division  
Preston Findlay, Office of Legal Counsel

#### **WEA Message Length**

NCMEC provided perspective and recommendations with regard to implementation of a proposed increase in WEA message length to 360 characters. If legacy systems or the existing technology of some mobile phone carriers are unable to accommodate an expanded 360 characters, NCMEC agreed that sending sequential messages to break apart a longer WEA message (4 x 90, for instance) would not be a good solution. In that situation, NCMEC would likely recommend

that for AMBER Alerts which have sufficient information (vehicle and license plate), one 90 character message be created using current practices, in addition to a full 360 character message. If specific vehicle information is not available, to avoid delay or additional time spent drafting two separate messages NCMEC also indicated that a uniform, standard message could be developed to convey basic important information (e.g., AMBER Alert, city and state involved, and instructions to check local media for details) to the small percentage of recipients who could not receive a full WEA message and automatically included with each full 360 character message.

### **URLs and Phone Numbers**

NCMEC again reiterated support for the ability to provide a URL address directing WEA recipients to a website specifically used for AMBER Alerts which would provide the most up-to-date information available, and potentially avoid any unnecessary additional messages to convey changes, updates, or cancellations of the AMBER Alert. In response to questions about which website(s) or domain(s) the URL contained in a WEA message could link to, NCMEC agreed that the conversation should continue with the U.S. Department of Justice, FCC, and NCMEC to discuss any options.

At this time, NCMEC does provide a single website ([www.missingkids.org/AMBER](http://www.missingkids.org/AMBER)) which contains up-to-date information about all active AMBER Alerts in the country, and visitors to the government AMBER Alert website (or countless other websites) are directed to this NCMEC URL for current information. NCMEC utilizes a robust Content Delivery Network to ensure that the website can accommodate even the highest volume of simultaneous visitors seeking information about a current AMBER Alert, and it is optimized for viewing on mobile devices. In response to related questions about potential network traffic, NCMEC has recent experience with several AMBER Alerts issued for children abducted in highly-populated metropolitan areas where WEA messages and secondary alert distribution reached a large number of recipients in a short amount of time. So far this has not caused any disruption to maintaining an active, viewable website with details of the case and a photo of the missing child. For reference, a typical AMBER Alert page published by NCMEC for a missing child contains an average of 15KB of data when downloaded and viewed on a mobile device.

Finally, in response to a proposed option for allowing WEA messages to include a URL which would only be accessible when a recipient's phone is connected to a WiFi network (rather than a cellular network alone), NCMEC identified the need this would create for further public awareness and education on the nature of WEA messages. It would be important for all recipients to realize this requirement in advance to prevent confusion or frustration by the inability to click or visit a provided URL. NCMEC also reminded the group that the history of the AMBER Alert program involves utilizing highway signs and vehicle information, in part out of recognition that motorists provide a valuable source of possible leads or sightings in a child abduction scenario. Drivers and passengers are much less likely to have their phone connected to a WiFi network while inside a vehicle or otherwise traveling away from their home or business, so it would be important to consider the impact this proposal might have to recipients who want to quickly access detailed information about an AMBER Alert.

## **WEA Tests**

Although NCMEC does not currently perceive any necessity or benefit to sending out additional WEA test messages related to the AMBER Alert program, it is recommended that any testing is careful not to impact consumer participation. Proposals that allow consumers to “opt-in” before receiving any test messages or allowing uniform choices across all carriers and devices for consumers to adjust the sound and vibration settings of WEA messages, may help reduce frustration and encourage more consumer participation.

## **Public Service Announcements**

A number of subjects, including several noted above during the discussion, could support the need for further public education. NCMEC remains willing to participate and collaborate on any relevant proposed PSA or awareness campaigns.

## **Crowdsourced Feedback**

Some interesting possibilities were raised for WEA recipients to provide real-time or other feedback. By briefly discussing NCMEC’s own methods of receiving and processing information, NCMEC emphasized that for an active AMBER Alert, the first priority is ensuring that the most relevant information, sightings, and leads are communicated as quickly as possible to the investigating law enforcement agency to help them safely locate the abducted child.

## **Preservation or Repeated Viewing of WEA Message**

The capability to access AMBER Alert WEA messages that have already been viewed, would be a significant benefit for the public. This capability currently exists inconsistently across different devices and carriers, and in NCMEC’s experience many recipients have expressed a desire to be able to access or review a WEA message that has previously appeared on their phone. The most common example from the AMBER Alert program is a driver who wishes to safely read (or re-read) a message after pulling over their vehicle.

The National Center for Missing & Exploited Children appreciates the opportunity to meet with the FCC Public Safety & Homeland Security Bureau to discuss these important issues.

Respectfully submitted,



Preston Findlay  
Counsel, Missing Children Division  
National Center for Missing & Exploited Children