

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of Amending Rules Regarding the Emergency Alert System  
and Improving Wireless Emergency Alerts

PS Docket No. 15-94

PS Docket No. 15-91

**AC&C LLC COMMENTS**

AC&C, LLC supports an enhancement to the current alerting system based on Device Based Alerting. See below for a brief description of Device Based Alerting and for additional detail refer to PS Docket No 15-91, our Comments dated 2/13/16 and our Reply to Comments dated 3/12/16.

An effective alerting system is originated by a trusted source and is received only by those that are in the designated alert area. The existing alerting mechanisms often over-alert citizens, reducing the value of the service to both alert originators and to the public. Numerous public safety organizations identify the need to have more granular alerting capability as the key to evolving the alerting programs. The best way to enhance the current system so that alerts can be contained to a geo-targeted area is to take advantage of the incredible power of mobile devices.

People carry their devices with them everywhere. Devices today are no longer just “receive only” or dumb devices. They are aware of their location, can perform complex calculations, store great amounts of information, have many features, and enhanced functionality (display screen, maps, camera, etc.). While networks distribute information, it is the devices that process this information. It also is the device that evolves constantly. Therefore to continue to be affective and keep pace with future device innovation, it is our recommendation the FCC focus on device based alerting.

**Device Based Alerting:** Device based alerting leverages the key components of Cell-Broadcast technology [unlimited communication capacity within the broadcast area, no databases, and one-way broadcast protecting privacy] to push information into the general alert area combined with the device’s location awareness to decide **Who** the alert is relevant for and **How** the alert is displayed on the device. By passing the alert area coordinates generated by the public

safety alert originator to the device along with the alert message, the device can compare its physical location to the alert area coordinates and play the message only when it is within the alert area. Once the device realizes the alert is relevant to its location, it then decides how the person wants the message displayed. The device personalizes a mass notification by:

- confirming why the person is receiving the alert by showing the device's position within the polygon on a well-defined active map;
- looking and displaying the message in the preferred language of the device user if it is available;
- following the instructions set in the device to convert the text to speech, vibrate and flash;
- allowing the user to access additional detailed instructions for what to do during a tornado, flash flood, hurricane, etc. already stored on the device; and,
- as a “receive only” broadcast, device settings and user defined information can be leveraged to further personalize a message without extracting any information from device, thus protecting the privacy of the end user.

Since the alert area coordinates are contained in the data file with the message, the ability to geo-target is maintained using any delivery medium and evolves with the carriers chosen technology, including rapid deployed networks (COWs/COLTs/etc.) in the aftermath of natural and man-made disasters. The Common Alert Protocol (CAP) standard is designed to accommodate the broadcast of additional information, including geo-coordinates, to the device. AC&C's device-based enhancement is designed to integrate with current technologies being used by Public Safety and the wireless industry.<sup>1</sup>

These capabilities suggest that a device-based enhancement to the current WEA service not only will address a significant number of the concerns raised in the comments for NPRM 15-91, including about the lack of geo-targeting capability, but that it also may have additional benefits. Please refer to AC&C's Reply to Comments dated 3/12/16 for additional details and information.

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<sup>1</sup> It is important to note that PGAlert is designed as “receive only”, protecting the privacy of the end user.