

VIA ELECTRONIC FILING

March 21, 2016

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street SW  
Washington DC 20554

Re: Wireless Emergency Alerts (WEA) – Docket # 15-91

Dear Ms. Dortch:

On Thursday, March 17, 2016, Michael Leibovitch, Shu-Lin Chen, Calum Tsang, Aviv Siegel and the undersigned from BlackBerry had a conference call with James Wiley (Attorney Advisor) Yoon Chang (Electrical Engineer), Behzad Ghaffari (Electrical Engineer), Steven Carpenter (Electrical Engineer), Associate Division Chief, Gregory Cooke, and Carolynn Shillingburg, Legal Intern, and Lisa Passarella, Legal Intern of the Federal Communications Commission Public Safety and Homeland Security Bureau.

In the meeting, the participants discussed BlackBerry's support for the concatenating of WEA messages and the study of potential network capacity issues associated with such a change, and that such a decision should balance the interests of both carriers and radio and cellular modem manufacturers. Additionally, BlackBerry did not believe that users would experience or be impacted by potential latency issues regarding the concatenation of WEA messages assuming that WEA messages are sent quickly over the network. With respect to embedded references, today, a device will use the WiFi network if attached instead of a cellular network. While this would reduce the burden placed on the cellular network, BlackBerry pointed out potential security implications of embedded references and the potential for redirection of the user to illegitimate URLs and rogue networks that could increase cyber security risks.

The meeting participants also discussed multilingual alerting and BlackBerry stated that it did not rely on or support multilingual alerting. For an emergency message, it was BlackBerry's view that the changing of a single word can change understanding and automatic translation can often fail to account for nuances between languages.

Other topics also discussed included the benefits and technical challenges of geo-targeting, the importance of alert prioritization, opt-out, and alert preservation functionality.

**Geotargeting:** The ability to engage in geotargeting presents potential latency issues. Latency can occur when trying to achieve an accurate position, (e.g.. it can be from seconds to up to a minute to lock

position, depending on how far the device has changed from its last position and what location references/network assistance are required). Furthermore, network dependencies exist to achieve an accurate position that may incur more traffic on the network, which may not be desirable in emergency situations. WEA messages to the devices will have to be longer to include the geo-fence coordinates, possibly using extended messages as discussed at the beginning of the call. The device may also need to keep logic to determine if a geotargeted message is valid. Lastly, the device may need to reference regularly a database of pertinent location data to be able to perform its geotargeting properly and maintaining the database current will also impact network traffic. Thus, a proper algorithm becomes crucial.

**Alert Prioritization::** BlackBerry believes while it is technically feasible to receive a WEA alert during an emergency call, this priority would be distracting to the user. If a user has chosen to make an emergency call in response to that WEA alert, the user has chosen as a matter of priority to focus on that particular task.

**Opt Out:** BlackBerry encourages enhanced opt out functionality such as scheduling and time of day features to be left for innovation by the device manufacturer. However, if the FCC has required functionality, BlackBerry strongly encourages clear definition of those requirements so that all manufacturers must comply in the same way.

**Alert preservation:** BlackBerry 10 and Android both keep alerts in an “inbox” which the user can access later. BlackBerry would recommend any access method not be standardized because each manufacturer user interface paradigm differs and forcing one method may be incongruent with the actual design of the operating system. If the FCC mandates this as required functionality, BlackBerry strongly encourages the FCC to provide clear definition of those requirements (e.g. preservation and ease of access).

Regards,

/s/ David T. Blonder

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