

March 21, 2016

Ex Parte

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

*Re: Improving Wireless Emergency Alerts and Community-Initiated Alerting,
PS Docket No. 15-91*

Dear Ms. Dortch:

On March 17, 2016, Kimberly Scardino, Sherman Jin, and David Lacy Kusters of Apple Inc. and Paul Margie and Austin Bonner on behalf of Apple met with James Wiley, Gregory Cooke, Steven Carpenter, Behzad Ghaffari, and Lisa Passarella of the Public Safety and Homeland Security Bureau (“PSHSB”) at PSHSB’s request to discuss the above-referenced proceeding.¹

Apple expressed its appreciation for the FCC’s invitation to discuss emergency alerting. The company shares the Commission’s goal of finding approaches that provide customers with the best experience with Wireless Emergency Alert (“WEA”) messages. During the meeting, Apple discussed expanding WEA length to 360 characters. Apple explained that it would need to review proposed amendments to relevant 3GPP standards related to this topic in order to determine the feasibility of this proposal. Apple further explained that iPhones do not currently have the capability to parse a 90-character message out of a 360-character message at the device level. Apple additionally noted that long alerts may inundate the user with information, leading to less user comprehension and increasing the likelihood of user opt-out.

Apple agreed with the Commission’s assessment that enabling users to opt out of certain alerts at particular times or under specified conditions (such as when Do Not Disturb mode is turned on) would likely increase end-user participation. Apple explained that it provides a uniform opt-out system across all of its WEA-capable handsets, and noted that any new rules should provide flexibility to create innovative opt-out solutions rather than prescribing a single method, format, or interface across multiple platforms.

With respect to multilingual alerting, Apple explained that iOS does not include an in-device functionality that automatically translates WEA messages. Moreover, emergency alerts should contain accurate and reliable translations, which are best provided by the alert originator.

¹ Other than Ms. Scardino, the Apple participants joined via teleconference.

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Apple agreed with the Commission that sending a large number of messages in different languages could lead to capacity challenges and user fatigue.

Additionally, Apple discussed embedded references in WEA messages. Apple noted that the Commission's rules should ensure that alerts convey recipient-usable information in the absence of broadband Internet access. Apple also suggested the Commission consider the possibility that numerous users simultaneously attempting to access embedded references during emergencies could overwhelm networks (such as cellular data networks and networks providing service to Wi-Fi routers) and web servers. In Apple's experience, concise messages are more likely to succeed with users than messages that require readers to click through to a website for additional information.

With respect to geo-targeting, Apple explained that iPhones do not support device-based geo-targeting for WEA messages, and that substantial research would be required to assess the feasibility of this approach. Apple noted that in-device geo-targeting would still require coordination with carrier networks, and that locating devices indoors presents ongoing challenges. In addition, Apple observed that carriers are already improving their network-based location technologies.

Finally, Apple noted that a study of the emergency alert system based on voluntary participation by individuals, or exploring tests with carriers based on dedicated test devices, would each present fewer complex issues, including fewer privacy questions, than would a mandate that all devices submit test data to a third party.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "A.P. Margie".

Paul Margie
Counsel for Apple Inc.

cc: meeting participants