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March 22, 2016

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

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

Dear Ms. Dortch,

On March 18, 2016, Jeff Cohen, Mark Reddish, and Max Hsu of the Association of Public-Safety Communications Officials (APCO) International met with James Wiley (Attorney Advisor) andCarolynn Shillingburg (Legal Intern) of the FCC's Public Safety and Homeland Security Bureau to discuss the above-captioned proceeding.

APCO stressed that WEA is the only official, IPAWS-based channel for the reliable and secure dissemination of wireless alerts to mobile devices. As such, the Commission should seek to enhance WEA to the maximum extent possible. If the current WEA architecture presents formidable technical challenges, then the focus should be on implementing enhancements using newer wireless technologies within a reasonable timeframe.

APCO reiterated its support for increasing the maximum permissible character length of WEA messages from 90 to 360 characters. Recognizing that until all participating CMS providers support 360-character messages on their networks, some messages will need to be delivered in multiple parts. In response to the Bureau's question as to whether CMS providers or alert originators should be responsible for parsing a 360-character message into multiple 90-character messages, APCO noted that the CMS providers should be responsible for parsing messages as needed. During emergencies, PSAPs and other emergency operations personnel are focusing on response and recovery. The more efficient the WEA process for the public safety originator, the more useful the platform as an important tool for mitigating emergencies. Thus, carriers should automatically concatenate and label messages appropriately. Alternatively, APCO noted that it may be possible that alert origination software products could perform this function.

APCO continues to support the Commission's proposal to eliminate the prohibition of embedded content in WEA messages. With respect to the

anticipated impact of embedded content such as URLs and phone numbers in WEA messages, APCO suggested that the current use of non-WEA messaging and alerting platforms by state and local agencies may provide useful examples of how WEA messages will benefit from embedded content. APCO acknowledged concerns regarding potential network congestion resulting from increased traffic following an alert with an embedded URL but pointed out that even after receiving a text-only alert, consumers are likely to use the network to search the web for more information. Thus, embedding content in WEA alerts can actually reduce network congestion by pointing consumers directly to pertinent information, thereby reducing milling behavior. APCO expressed concern that limiting URL access to consumers with Wi-Fi could cause substantial consumer confusion and reduce the effectiveness and use of the WEA messages.

APCO reiterated its position that test reports and alert logging would be valuable to public safety. In this regard, Bureau staff suggested that, in addition to whether a message was delivered and if not, why it failed to be delivered, additional information such as the percentage of successfully delivered alerts, what errors occurred, the latency of alert receipt on a device, and the accuracy of geo-targeting could also be useful. APCO agreed that this information may be helpful to alert originators.

On the issue of facilitating community feedback to WEA messages, APCO expressed concern that public safety agencies are frequently understaffed and underfunded, and may not have the resources to manage such feedback. Further, verifying the accuracy of the feedback provided and diverting information from 9-1-1 raise significant operational concerns. While streamlining the collection and analysis of community feedback could be helpful, APCO suggested that the Commission consult with individual agencies for their opinions on the issue.

Finally, while not an issue raised in the NPRM, APCO recognized the potential value in allowing consumers to access alerts that they have already viewed. For example, consumers may wish to access a list of shelter locations contained in a WEA message for some time after the message was originally viewed. APCO also noted that the inclusion of embedded URLs allows agencies to host important information elsewhere, and can therefore assist in preserving the availability of emergency information.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,

/s/  
Jeffrey S. Cohen  
Chief Counsel