



April 20, 2016

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

[Submitted via FCC Electronic Comments Filing System]

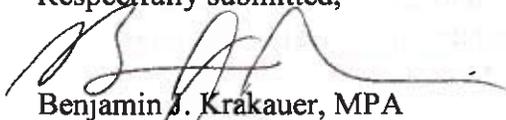
**Re: NOTICE OF EX PARTE PS Docket 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting**

Dear Secretary Dortch:

On April 15, 2016, representatives of the New York City Emergency Management Department (“NYCEM”) and the New York City Department of Information Technology and Telecommunications (“DoITT”) participated in an *Ex Parte* conversation on the above referenced matter with and at the request of representatives of the Federal Communication Commission’s (“FCC”) Public Safety and Homeland Security Bureau (“Commission”).<sup>1</sup> The meeting was held at NYCEM Headquarters with some attendees participating via teleconference. A summary of the discussion is found on the following page.

NYCEM sincerely appreciates the Commission’s ongoing efforts to improve Wireless Emergency Alerts and looks forward to continuing to work with the Commission in crafting and implementing the regulatory changes necessary to enhance this critical system. Further communication on this matter may be directed to the undersigned.

Respectfully submitted,



Benjamin J. Krakauer, MPA  
Director, Watch Command

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<sup>1</sup> **NYCEM Participants (in person)** – Henry Jackson, Deputy Commissioner for Technology and Strategic Resources; Frank McCarton, Deputy Commissioner for Operations; Christina Farrell, Deputy Commissioner for External Affairs; John Grimm, Assistant Commissioner for Operations; Benjamin J. Krakauer, Director of Watch Command; Sonja Orgias, Director of Legal Affairs; Allison Pennisi, Deputy Director of Communications. **DoITT Participants (in person)** – Priya Shrinivasan, Assistant Commissioner for Telecommunications Policy; Tanessa Cabe, Telecommunications Counsel **FCC PSHSB Participants** – David Furth, Deputy Bureau Chief (in person); David Simpson, Bureau Chief (teleconference); Lisa Fowlkes, Deputy Bureau Chief (teleconference); Gregory Cook, Assistant Division Chief (teleconference).





## **Crowdsourced Feedback**

NYCEM continues to be very interested by the potential to obtain “crowdsourced feedback” following issuance of a WEA message. Consistent with our written comments<sup>2</sup>, NYCEM does **not** support the Commission adopting rules that would allow for “emergency requests” (e.g., “I need to be rescued,” “Send me an ambulance,” or “My house is on fire,”) to be received following issuance of a WEA message. The capability to handle such requests adequately would require tremendous investment in technology and personnel resources and erroneous requests could divert resources from individuals who require emergency services. Instead, NYCEM offered two examples of how the agency would use crowdsourced feedback immediately after it became available:

1. **Storm-Related Damage/Downed Trees** – NYCEM would issue a WEA message following a strong storm/tornado and ask people to report back if there was a downed tree or storm damage visible at their present location. Using the latitude/longitude provided in the user’s feedback, NYCEM would plot the data on a map and could immediately view concentrations of damage and deploy emergency resources, assessment teams, and other forms of support.<sup>3</sup>
2. **Evacuation Compliance** – NYCEM would issue repeat WEA messages to coastal areas under an evacuation order at several intervals prior to a storm’s landfall. Using handset delivery data provided by the mobile service providers, NYCEM could intelligently estimate the public’s evacuation compliance. If handset delivery data remains constant, NYCEM would enhance efforts to improve evacuation compliance (e.g., increased outreach, repeated messaging by the Mayor and other elected officials, etc.)

## **Opt-Out**

NYCEM reiterated that the Commission should seek legislative relief from Congress regarding the requirement that an “opt out” option remain available for locally-developed WEA messages. Given the current threat environment and the fact that all emergencies begin and end locally, local emergency management needs to have the unimpeded ability to reach the general public. Additional details on our opinion on this matter can be found in our written response to the NPRM.<sup>4</sup>

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<sup>2</sup> Comments from NYC Emergency Management, dated December 29, 2015, page 10

<sup>3</sup> For the Commission’s benefit, NYC Emergency Management previously provided a copy of a downed tree map as that we developed based on public reports to 3-1-1 following a series of tornados in September 2010. NYCEM would be able to produce a similar map in minutes following WEA reports. See our Ex Parte filing dated March 19, 2016.

<sup>4</sup> Comments from NYC Emergency Management, dated December 29, 2015, page 7 at 1.