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

Re: Notice of *Ex Parte* Presentation (PS Docket No. 15-91)

Dear Secretary Dortch:

On Friday May 20, 2016, staff from the National Center for Missing & Exploited Children (NCMEC) met with several employees of the FCC Public Safety & Homeland Security Bureau and representatives from AT&T to provide comments and discuss questions relevant to the AMBER Alert program, as it relates to the Notice of Proposed Rule Making and improvements to the Wireless Emergency Alert (WEA) system. A detailed summary of the discussion is offered below, and a complete list of the meeting participants follows at the end.

WEA Message Content and NCMEC Best Practices

NCMEC provided a historical and current perspective regarding how AMBER Alert messages (utilizing the more recent WEA system or other longer-standing distribution channels) are focused on providing as much useful, specific information to the public as possible with clear directions to the message recipients about the actions they should take in response. Years of experience with secondary AMBER Alert distribution, has underlined the importance of disseminating photos of the missing child (and abductor, if available), vehicle information, and detailed descriptions of the circumstances involved. It would be tremendously valuable for the AMBER Alert program to not only expand the character limitations for WEA messages, but wherever feasible to allow these messages to transmit embedded references and photos.

During the meeting, NCMEC described generally the information contained in an AMBER Alert message as well as a more typical message/poster/broadcast for any missing child scenario. In response

to a question related to cyber security, NCMEC emphasized that there have been no previous incidents in which images disseminated by NCMEC during an AMBER Alert or other missing child situation have contained unintentional malware or other risks to recipients. In addition to internal processes minimizing this possibility, each missing child photo disseminated during an AMBER Alert is directly provided by or specifically confirmed by the issuing law enforcement agency. Although NCMEC is not aware of any cyber security breaches related to WEA messages or other content distributed during an AMBER Alert, NCMEC takes this issue seriously and is willing to discuss further controls or best practices to eliminate related risks.

Network Congestion Concerns and Embedded References

NCMEC reiterated the small data size (approximately 15KB) of a typical AMBER Alert web page published by NCMEC for a missing child, which should not significantly impact network congestion even if a large volume of users visited the page simultaneously. NCMEC's website is already optimized for viewing on mobile devices, but if WEA message recipients received an embedded URL directing them to a NCMEC page (or any other dedicated page) in the future it would be possible to further focus on conserving file/data size and even limit the links or share-buttons on the page to ensure page visitors don't use additional data. NCMEC also suggested that providing a single URL in WEA messages could actually reduce searches or other "milling" behavior from recipients, helping to limit effects on network congestion. For example, a recipient who receives one embedded URL would not need to "check local media" for further information (a common component of AMBER Alert broadcasts now) or use their internet browser and search engines to attempt to find more details, potentially using more network resources.

Including a "clickable" phone number in WEA messages would also be valuable for AMBER Alerts. This improvement would mirror NCMEC's current practice to include "Report a Sighting" options wherever possible, allowing users to send a direct message or call from their mobile device to NCMEC's hotline or the investigating law enforcement agency if they have information about a missing child. It is important to remember that every AMBER Alert involves a child in possible life-threatening danger, and improvements to reduce the time and steps between sighting a child and contacting NCMEC or police to provide that information, could be significant.

Conclusions

NCMEC agrees with AT&T that enhancing the capability of WEA messages to include embedded references (at least URL and phone numbers) for AMBER Alerts is appropriate. Among other improvements, this capability would continue to advance the overall goal to locate and recover abducted children more quickly and safely.

The National Center for Missing & Exploited Children is encouraged by this collaboration and appreciates the opportunity to meet with AT&T and the FCC Public Safety & Homeland Security Bureau to discuss these important issues.

Respectfully submitted,



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Counsel, Missing Children Division
National Center for Missing & Exploited Children

Meeting Participants:

FCC Public Safety and Homeland Security Bureau

Admiral David Simpson
Lisa Fowlkes
Nicole McGinnis
Zenji Nakazawa
Gregory Cooke
Rasoul Safavian
Behzad Ghaffari
James Wiley
Lisa Passarella
Stephanie Anne Winkler
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AT&T

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NCMEC

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