

providers were already working in connection with certain agencies to implement EAS functionality for mobile systems. While CTIA also noted that there were a number of technical and implementation issues to be addressed, it observed that the wireless industry had worked successfully in conjunction with government agencies in a number of similar contexts. For example, the wireless industry is working with the Department of Justice (“DOJ”) to develop the Wireless AMBER Alert service and with the Department of Homeland Security (“DHS”) on Wireless Priority Access services (“WPS”). In that spirit, CTIA and the wireless industry are proposing herein to host a one-day seminar in March of this year to discuss and develop a service description for wireless EAS. CTIA looks forward to working with the affected agencies and taking this significant step toward development, and ultimately delivery, of an EAS solution.

CTIA and the wireless industry recognize the importance of the Commission’s EAS effort and appreciate the opportunity to work in a collaborative environment with the Commission. Indeed, CTIA also noted that the industry has worked successfully in connection with the Federal Emergency Management Agency (“FEMA”) on an EAS pilot project using CMRS capabilities. However, CTIA also noted that the existing wireless infrastructure is optimized for the delivery of point-to-point messages, and not the types of geographically targeted, point-to-multipoint alerts developed in connection with the broadcasting industry.

In view of the significant network modifications that are entailed by this fundamental paradigm shift, as well as the impact on capacity of any specific EAS event, CTIA suggested that the Commission consider: (i) a joint government initiative to develop specific service level requirements for EAS; (ii) carrier liability protection for delivery of EAS messages; (iii) development of specific authorities, security authentications, and protocols for invoking wireless EAS capabilities; and (iv) research, development and implementation support.

CTIA is firmly committed, and looks forward, to working with the Commission and other government agencies as we move toward an EAS solution for mobile systems. As CTIA has stated, the first step toward development, and ultimately delivery, of an EAS solution is the establishment of EAS requirements—how EAS messages are delivered to providers, what type and format of EAS messages are anticipated, the timeframe for delivery of EAS, and similar issues. If EAS is to be a seamless experience, these questions must be considered for each of the existing U.S. air interfaces, including CDMA, GSM, and iDEN, as each of those systems may have unique implementation issues with particular EAS requirements.

Accordingly, CTIA would like to invite representatives from the Commission, as well as representatives from FEMA, the National Oceanographic and Atmospheric Administration (“NOAA”), and the National Communications Systems (“NCS”) in March of this year to a technical summit with the wireless industry to open a specific dialogue on development of a service description for wireless EAS. CTIA believes that hosting a meeting with representatives from the industry as well as from the lead agencies that are involved in the current EAS system will continue the progression toward a wireless EAS solution.

CTIA and the wireless industry look forward to working with the agencies to develop specific capabilities for EAS, just as the industry has worked with the DOJ on Wireless AMBER Alerts and the DHS on Wireless Priority Service. CTIA believes that the summit meeting it proposes herein will significantly advance the objectives of the FCC, the agencies, and the wireless industry in moving forward with development and realization of wireless EAS capabilities.

Respectfully submitted,

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