

WIRELESS INDUSTRY EMERGENCY ALERT PROPOSAL

The industry understands the benefit of developing a wireless emergency alert service, and is committed to making that happen. The industry supports the Commission's desire to consider a solution that will encompass both wireless and other communications platforms and pledges to work cooperatively with the Commission toward that end. Industry already has taken substantial steps to achieving this goal. Without any government focus or mandate, the industry has implemented an AMBER Alert service in use today that informs interested consumers of missing children alerts. Additionally, for well over a year, CTIA and the wireless industry have been working with government and within the industry to develop a service that will deliver wireless emergency alerts to Americans. Moreover, industry also has been independently investigating several potential longer-term wireless emergency alert solutions. The industry's goal is to provide Americans with access to an alert service in the short-term while allowing the industry to continue investigation of geographic specific services. Accordingly, the industry proposes the following two-step effort:

SHORT TERM

The wireless industry will use its best efforts to provide an SMS-based Emergency Alert Service within 12 months of government solution on a protocol for development and delivery of messages to wireless carriers. (This service would be similar to the Wireless AMBER Alert service provided by 26 carriers nationwide.) An SMS-based service has one significant advantage over other possible solutions being considered: it is a capability that already is enabled in GSM, CDMA, and iDEN networks, and is available on over 170 million phones in the United States today. However, government must understand the limitations of SMS, and similar to any technology deployment adopted with these short timescales, this will be an interim solution only. An SMS-based solution utilizing existing capabilities will necessarily suffer from several technical and operational infirmities, including, but not limited to, potential significant impact on network congestion when an alert is sent, potential latency in delivery of messages, and a limitation on what and how much information can be provided. The integrity and functioning of the network could be impaired in delivering SMS alerts.

In order to deliver a short-term wireless alerting solution, the industry proposes that six predicates be met:

- First, the system must allow consumers to opt-in to a specified zip code or (or multiple zip codes) as with Wireless AMBER Alerts. Consumers will receive alerts for those zip codes where they choose to receive messages. Affirmatively requiring consumers to request the service appropriately takes

into account the network conditions that exist today while addressing those consumers that wish to be alerted on their wireless device as an additional method to make consumers aware of an emergency. Combining this wireless service with alerts from other communications platforms should increase the likelihood of a successful consumer notification.

- Second, this short-term service should be limited to only transmit Presidential or Governor-level messages. Again, this will help limit the impact on the wireless network and maintain overall service capabilities so that during times of crisis, the networks can be utilized by consumers, first responders, and those key government employees that rely upon Wireless Priority Service in times of crisis.
- Third, government must deliver an authenticated message to a single point of aggregation, as is the case with the existing Wireless AMBER Alert Program.
- Fourth, limitation of liability for participating carriers is necessary.
- Fifth, the industry believes carriers must be able to recover their full costs and requests and welcomes any government support to help expedite and accelerate deployment.
- Sixth, government/aggregator must deliver emergency alert messages in a format that can be retransmitted using the existing SMS protocol.

By adopting these six principles, government will strike a reasonable balance between the desire to provide emergency alerts over multiple communications platforms, including wireless, against the need to keep the wireless networks functioning efficiently during an emergency.

LONGER TERM

Presently, wireless networks are engineered to use unique identifiers (i.e., MINs) to route and deliver messages to specific devices, and are not designed to deliver messages to all devices in a specific geographic area (“cell broadcast”). The wireless industry currently is investigating the capability to target and/or “broadcast” messages to a specific geographic area. As part of the industry's continuing efforts to improve on existing alerting capabilities, CTIA and the industry will work with government and continue to intensively investigate and test the ability to target messages geographically.

As part of a longer-term effort, CTIA and the industry, in conjunction with the government, need to define the service requirements for a longer term wireless emergency alert service. As part of that effort, CTIA and the industry will continue to work with key government officials (the first meeting occurred on May 4, 2006) to

establish a service description for a wireless emergency alert service. The industry believes that the FCC is in the best position to take a leadership role in helping the Federal Government develop a consistent view on an upgraded Emergency Alert Service, particularly with regard to a wireless alerting capability. This will ensure a rational, more timely deployment of services. The industry commits to working with government with the goal of finalizing a service description by December 31, 2006.

The industry will commit to continue investigation of several of the solutions under consideration, including the capability to broadcast messages and target them geographically. Some promising solutions that can broadcast messages and/or target them geographically, and that won't negatively impact use of the network, or operation of handsets, are under consideration. While these solutions may hold promise, none are operational in wireless networks today. CTIA commits to reporting back to the Commission each year, on the status of development and delivery of a geographic specific service.

CONCLUSION

The industry would like to deliver a short-term SMS-based solution that will benefit Americans. While that solution is operational, CTIA and the industry will work closely with the Commission and the other key government agencies to develop a longer term solution. The creativity of the industry, as evidenced in its track record in the Homeland Security area, including delivery of a Wireless Priority Service and initiation of an AMBER Alert program, will lead to a solution that will further benefit Americans while balancing the ability of the Nation's 210 million wireless users to access the network in times of crisis.

While some would have the Commission believe that broadcast solutions already exists in networks today and simply need to be "activated," this is not the case. Most of those existing proposed solutions would require a complete reworking of networks, while some only work on certain platforms (CDMA vs. GSM vs. iDEN) and some are not scalable to a nationwide level, and most would require all, or the overwhelming majority, of consumers to change-out their handsets. If consumers are going to be required to bear these costs, and industry is going to be required to invest capital to rework networks, the solution being implemented should be carefully considered to take advantage of the revolutionary changes taking place in the industry and to minimize implementation concerns. The wireless industry has committed to evaluating all potential solutions, and CTIA has committed to host a one-day (or more if necessary) event where the industry will meet with any vendor that believes it has a solution to the Emergency Alert Service effort. CTIA and the industry look forward to working constructively to provide a timely upgrade of the Nation's Emergency Alerting capability.