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July 18, 2006

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**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., Room TW-A325  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation in WT Docket No. 04-296  
Review of Emergency Alert System

Dear Ms. Dortch:

On July 17<sup>th</sup>, 2006, John Scott and Andy Lachance of Verizon Wireless met with Fred Campbell, Legal Advisor, Wireless Issues to Chairman Kevin J. Martin, regarding the above-referenced rulemaking proceeding. Also attending the meeting was the undersigned outside counsel for Verizon Wireless.

At this meeting, Verizon Wireless supported adoption of a short term SMS-based solution for wireless EAS patterned after the existing Amber Alert Service. Verizon Wireless emphasized the need to determine common service specifications (*e.g.*, type of alert, geographic delivery requirements, character requirements) as well as technical implementation specifications (*e.g.*, method of delivery to carrier, form of message, common interface protocols for gov't. to distribute message to carrier, process for authentication of message, security protocols, identification of aggregator) before implementation begins. It also noted that, because SMS is a point-to-point technology, not a broadcast technology, it should not be made subject to time of delivery requirements and should be offered to customers on an opt-in basis.

In addition, Verizon Wireless discussed as a longer term EAS solution utilizing the paging channel of its CDMA network to distribute broadcast text messages. The CDMA technology Verizon Wireless uses is a point-to-point service not designed for broadcast capabilities. However, CDMA networks do have this one broadcast component in the network, generally used for communicating system management instructions to cell sites. Because this solution would rely in part on existing capabilities in the network, it can be developed and deployed within two to three years after the standards, protocols and other specifications for alerts are determined. It will provide broadcast capability for delivering messages of up to 120 characters of text. Verizon Wireless also noted that existing handsets are not

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capable of using the paging channel to receive alerts, and thus customers would need to acquire new handsets to receive this service. Finally, Verizon Wireless emphasized the infeasibility of a mandate for wireless systems to deliver video EAS messages.

Respectfully submitted,

*/s/ Nancy J. Victory*

Nancy J. Victory

cc: Fred Campbell