

Cellular Emergency Alert Systems association, United States Chapter

Open Comments

In the Matter of

The Commercial Mobile Alert System, Notice of Proposed Rulemaking

PS Docket 07-287

Filled: 4th Day of February 2008

Released: 4th Day of February 2008

The U.S. Policy Advisory Board of the Cellular Emergency Alert Systems association wishes to extend its congratulations to the members of the Commercial Mobile Alert System for their dedication to the evaluation of the potential role private wireless telecommunications technology and infrastructure could play in improving the ability for public agencies to better alert and inform its 'citizens-at-risk'.

Background

In the original petition to the FCC filed by the association's founder, D. D. Weiser in 1994, the need to include 2nd generation cellular telecommunications networks' potential ability to achieve the stated purpose of the Emergency Alert System's goal of providing "localized warning of emergency events" as defined by CFR FCC Part 11 Rules was clearly identified.

As an independent Information Society, CEASa has had the honor to compile and evaluate the performance and challenges to the use of cell-broadcast messaging for emergency alert and advisory application by networks in Asia, Europe, and the Middle East. It has also been our privilege to promote the deployment of the first Broadcast Emergency Alert System by the first U.S. Cellular Network, Einstein PCS.

The association's purpose has been to protect the networks, governments, and public from the growing use of 'point-to-point' messaging media for mass notifications which industry standards have clearly defined as having potential threats and the need for Cell-Broadcast as a complementary messaging technology to Short Messaging Service for public warning applications. It is with great satisfaction that the Board recognizes that the Purposed Rulemaking clearly stated the availability and appropriateness of Cell-Broadcast Messaging as an immediate solution for providing Americans with a modern tool for improved emergency warning..

It is from this perspective; the Board offers the following observations and recommendation for consideration by the Commission.

Actions:

- 1) The rapid acceleration and magnitude of both manmade and natural disaster events demands the need to access mobile telecommunications subscribers for dissemination of authorized instruction must be given a priority above commercial feature implementations.
- 2) The safety of the 'citizen-at-risk' consumer must be a shared responsibility by governments who by law are given command; networks, by virtue of their architecture and technologies have the capability, and the at-risk public, which has the vulnerability. As such, the Board recommends the joint development of Trust Protocols that clearly defines each stakeholders roll, their expectation, limitations, and the compensations be defined.
- 3) Since disasters know no borders, and we live in a global society, it essential that the FCC as a member of the UN International Telecommunications Union, embrace and support actions to study the development of an internationally harmonized Cellular Emergency Broadcast Program to insure Americans traveling abroad will have access to emergency alert and advisory instruction in their chosen language.
- 4) To assure the availability of user devices that are capable of uniformly receiving and displaying Cell-Broadcast messages, the FCC is encouraged to adopt a standard of performance for all terminal devices sold in the US, and that the 'Message Identifier' code for level one broadcast alerts be default activated at the time of purchase.
- 5) Americans are the only citizens to have had a federal emergency warning system for over 60 years. It is the board recommendation that the purpose of new rulemaking for Commercial Mobile Alert Service should be to expand the reach and effectiveness of the familiar Emergency Alert and N.O.A.A. Weather Radio Systems by including personal communications networks' participation in the mass communications-based Part 11 Rules.
- 6) The 1994 Communications states the creation of the Federal Communications Commission is "For the purpose of promoting safety of life and property through the use of wire and radio communication". As such, it is the recommendation of the Board that the inclusion of Mobile Communication Services in the nation's emergency communications program must be a mandated requirement for use of public spectrum and, further, the use of private network infrastructure and spectrum assets must be compensated at rates comparable with other 'Air-Time' features.

Conclusions:

It is the conclusion of this Advisory Board that effective management of disaster events requires effective communication between government agencies and the public. The Commercial Mobile Service networks are the only communications providers to develop and deploy an industry standard specifically for public warning applications use. It is not possible to know how history would have been changed if the Commercial Mobile Industry and the Commission had taken action on Cellular Emergency Broadcast before the events of 9-11-2001, of the aftermath of hurricane Katrina. But is certain that the next disaster is only days away. It is our hope that the Commission will take all necessary action to insure this vital new communications tool will be available.

Respectfully submitted,

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