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EX PARTE MEMORANDUM

March 26, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Commercial Mobile Alert System, PS Docket No. 07-287

On March 26, 2008, the undersigned, representing the American Association of Paging Carriers (AAPC), met with Bruce Gottlieb, Legal Advisor to Commissioner Copps, concerning rules for implementation of the Commercial Mobile Alert System (CMAS), PS Docket No. 07-287.

On behalf of AAPC, the concern was expressed during the meeting that adopting more stringent geo-targeting requirements than recommended by the Commercial Mobile Service Alert Advisory Committee (CMSAAC) would have the unintended and unfortunate consequence of excluding paging carriers from participating in CMAS. Although the broadcast and simulcast technology employed in paging networks is well suited for mass alerting, the networks typically are not engineered to permit more granular geo-targeting than county wide. Moreover, given the mobile nature of paging subscribers and the high proportion of medical, emergency and first responder users, it would be improvident for paging carriers to limit alerting only to those subscribers located in the target zone at the time the alert is distributed. Accordingly, the Commission was urged to adopt the CMSAAC recommendation on geo-targeting.

Attached is a copy of the handout distributed at the meeting.

Respectfully submitted,

s/Kenneth E. Hardman

Enclosure

cc: Bruce Gottlieb

AMERICAN ASSOCIATION OF PAGING CARRIERS
Commercial Mobile Alert System (CMAS)
PS Docket No. 07-287
March 26, 2008

- * Voluntary Participation by CMRS Providers Is a Fundamental Principle of CMAS
 - * The Commission's rules should encourage participation, not pose unnecessary barriers to participation, by CMRS providers
 - * The technical standards for CMAS should build upon existing industry capabilities, not force deployment of other technology thought to be better
 - * The point-to-multipoint and simulcast technology employed by paging networks is well suited for CMAS, and paging carrier participation should be fostered by the Commission
- * The CMSAAC Recommendation on Geo-Targeting Should Be Adopted Without Modification
 - * Precise geo-targeting is inappropriate for a mobile service such as paging
 - * Inability to geo-target below the county level should not foreclose paging carriers from participating in CMAS
 - * If the Commission adopts more stringent geo-targeting requirements than recommended by CMSAAC, those CMRS providers not subject to E911 obligations should be exempted