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June 19, 2008

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of The Commercial Mobile Alert System*, PS Docket No. 07-287.

Dear Ms. Dortch:

The Telecommunications Industry Association (TIA) supports the vast majority of the Federal Communications Commission's (the Commission) Commercial Mobile Alert System (CMAS) First Report and Order.¹ As the Commission evaluates the need for CMAS testing, TIA urges the Commission to embrace the testing recommendations of the Commercial Mobile Service Alert Advisory Committee (CMSAAC) to define end-to-end testing as testing between the initiator of a CMAS alert and the Alert Aggregator/Gateway. Moreover, it is important that the Commission not allow testing that involves the delivery of test messages to wireless subscribers.

Currently in its 84th year, the TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, business opportunities, market intelligence and world-wide environmental regulatory compliance. Thousands of companies and individuals work through TIA to enhance the business environment for telecommunications, broadband, mobile wireless, information technology, networks, cable, satellite, unified communications, emergency communications and the greening of technology. TIA is accredited by the American National Standards Institute (ANSI).

¹ See *In the Matter of The Commercial Mobile Alert System*, PS Docket No. 07-287, *First Report and Order* (CMAS First Report and Order) (rel. April 9, 2008). See also Telecommunication Industry Association, Press Release, "Telecommunications Industry Association Applauds FCC Action Creating Voluntary Commercial Mobile Alert System" (rel. Apr. 11, 2008).

With regard to the CMAS, TIA supported passage of the Warning, Alert, and Response Network Act (WARN Act)² as a critical step in fostering an effective, reliable, integrated, flexible, and comprehensive system to alert and warn the American people in emergency situations.³ TIA was an active member on the CMSAAC, which was formed pursuant to Section 603 of the WARN Act, and TIA's member companies manufacture much of the communications equipment used to alert the public to any imminent threat to its health or safety.

The First Report and Order forbore from implementing testing parameters for the CMAS, noting that the absence at the time of an Alert Aggregator/Gateway rendered testing requirements premature.⁴ Now that the Federal Emergency Management Agency (FEMA) has announced its willingness to serve as the federal Alert Aggregator/Gateway for the CMAS,⁵ TIA urges the Commission to adopt the CMSAAC recommendations on CMAS testing.

TIA supports the recommendations of the CMSAAC that end-to-end testing should be defined by the Commission as testing between the initiator of a CMAS alert and the CMSP gateway.⁶ As recognized by the CMSAAC, the delivery of test messages to wireless subscribers is undesirable.⁷ These test messages would unnecessarily strain network resources and potentially alarm and confuse recipients.⁸ The best approach is to send a test message to "test terminals" to verify CMAS functionality.⁹ It is unclear, however, whether such a testing mechanism is technically feasible at this time.

² Security and Accountability for Every Port Act of 2006 ("Safe Port Act"), Pub.L. No. 109-347, Title VI — Commercial Mobile Service Alerts ("WARN Act").

³ See *PulseOnline*, TIA Reflects on 9/11 and Hurricane Katrina; Continues to Work toward Improving Public Safety Interoperability and U.S. Telecommunications Infrastructure (Sept. 2006).

⁴ CMAS First Report and Order, ¶ 91 ("In order to assure the reliability and performance of this new system, the CMSAAC recommended procedures for logging CMAS alerts at the Alert Gateway and for testing the system at the Alert Gateway and on an end-to-end basis. Because this presumes the existence of an entity acting in the role of Alert Aggregator/Gateway, we cannot adopt rules in this area at this time.").

⁵ See Federal Emergency Management Agency, Press Release, "FEMA to Assume Aggregator/Gateway Role for Nationwide Cell Phone Alert System" (rel. May 30, 2008).

⁶ CMSAAC Recommendations at 78.

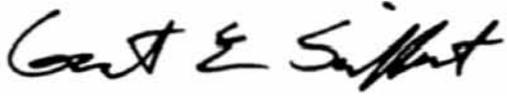
⁷ *Id.* at 79.

⁸ *Id.*

⁹ *Id.*

TIA thanks the Commission for its consideration and looks forward to working with the Commission to develop testing parameters that will most effectively develop the CMAS and benefit the public.

Sincerely,

A handwritten signature in black ink, reading "Grant E. Seiffert". The signature is written in a cursive style with a large initial "G" and "S".

Grant Seiffert
President