



March 5, 2009

Marlene Dortch
Secretary of the Commission
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: PETITION document for Proceeding # 03-109
Proposal for a service addition to the LIFELINE program
IMPORTANT: The PETITION dated March 06, 2009 supersedes the PETITION submitted on January 29, 2009

Dear Marlene,

As the CEO and Founder of First Alert System Text Corporation, I am sending you this cover letter in accordance with the FCC submission requirements for a Petition regarding Proceeding #03-109. Included in this letter will be information regarding: 1) the rationale and methodology for a nationwide emergency alert text messaging system; 2) the First Alert System Text (*FAST*) system advantages, including, most importantly, its availability for immediate and cost-effective implementation; and 3) the First Alert System Text Corporation proposal as a service addition for all cell phone numbers associated with the LIFELINE program.

Currently, *FAST* is available as a National Emergency Alert Notification System utilizing the SMPP (Short Message Peer to Peer) Protocol, the quickest and most reliable method for mass delivery of text messages. Originally structured through a strategic joint venture with VeriSign, *FAST* secured agreements with all major U.S. cell carriers allowing for nationwide delivery of emergency and informational notification messages directly to a subscriber's cell phone with its text messaging feature enabled.

CELL PHONES ARE NOW CONSIDERED THE BEST METHOD FOR RAPID AND ASSURED MASS COMMUNICATION:

Since 1996, U.S. cell phone users have grown from 34 million to over 250 million, with an estimated two billion users world-wide. Currently 25% of all U.S. households use only cell phones for voice communication, and that percentage is expected to dramatically increase as people discontinue the use of traditional landline telephones. The most obvious reason is that a cell phone is almost always on one's person.

DIFFERENCES IN PROTOCOLS: SMTP vs. SMPP

Both SMTP and SMPP are protocols for sending SMS messages. "SMS" is used as a synonym for a text message or the act of sending a text message.

- SMTP stands for "Simple Mail Transfer Protocol" and was first established in August 1982 as the primary means for sending email messages, as it remains in use today.

- SMPP stands for “Short Message Peer-to-Peer Protocol” and is the telecommunication industry’s favored protocol for exchanging SMS messages. *FAST* uses SMPP.
- Reporting Capabilities
 - SMTP doesn’t have any capabilities to report or log transmission activities
 - SMPP can provide information regarding successful and failed deliveries and a return receipt of delivery

Using SMTP, voice traffic takes precedence over SMS traffic and thus may prevent or delay any and all text message delivery during times of high demand usage, as would be expected during emergency situations. SMPP, however, specifically handles only text messaging, and therefore has priority routing enabling much faster and assured delivery at all times.

DEPENDABILITY AND RELIABILITY

- Cell phones can obviously operate during grid power outages, as they can be recharged in any vehicle or by any other 12 volt source. Of equal importance, cell carrier systems are generally operational without regard to grid power outages.
- To receive a message via fax, e-mail or voice mail you must have
 - Electric Power
 - Internet Connection
 - Be logged on or be next to a phone, fax or computer
- The recipient immediately knows the specifics of the emergency situation

THE COMPELLING REASON FOR AN EMERGENCY TEXT MESSAGE ALERT SYSTEM

The *FAST* system is designed to provide the President and/or any government agency with an efficient means to communicate with the American people regardless of their location in the event of a national emergency. Through *FAST*, there would be direct access to the 250 million cell phones using either a computer or one’s cell phone, provided that the secured administrative access setup has been followed.

THE *FAST* EMERGENCY ALERT SYSTEM ADVANTAGES

- **Automatic Operation.** *FAST* enables automatic notification from NOAA to the cell phone user’s specifically affected geographic areas, thus providing all Emergency Operations Centers that added assurance of public awareness of a situation.
- **Redundancy for Assured Delivery.** *FAST*, using three redundant data centers, provides for an assured service level required before, during, and after emergency situations. Only one data center is required for nationwide delivery.
- **Most Assured Receipt of the Notification.** As most people now carry their cell phone at all times, a *FAST* text message is more likely to be received when compared to weather radios and TV broadcasts

No Implementation Costs to Any Federal, State, or Local Agency, Including Schools
Administrative access to the *FAST* National System is provided free to any agency needing the ability to communicate via text message.

FAST IS READY FOR IMMEDIATE IMPLEMENTATION

Thousands of hours have been expended to design and build the *FAST* National Emergency Alert Notification Service. The goal was simple and straightforward. It was to provide a system that everyone could use, design a program that would enlist the support of all U.S. cell carriers, and, most importantly, to develop a plan that allows free access to all agencies charged with the responsibility of emergency alert notification. Plus, *FAST* is guaranteed to be a marketing dream, as it is an easy acronym for everyone to remember and accept. What could be better than a *FAST* response!!

CURRENT ADOPTION STATUS OF *FAST* BY AGENCIES AND SUBSCRIBERS

FAST started offering access to the service in October 2007, with the official launch and public awareness campaign starting on January 30, 2008. Since that time, there have been an ever-increasing number of people subscribing to receive *FAST* alerts. **The basic issue, however, simply remains that an effective national implementation of an Emergency Text Message Notification System will require automatic inclusion of all cell phone users in such a system at no additional service cost to that user or the cell phone carrier.**

THE FIRST ALERT SYSTEM TEXT PROPOSAL

- 1) All U.S. cell carriers will be provided the ability to deliver SMS information transmitted by the *FAST* National Emergency Alert Notification Network to their entire customer base, thus, by default, including this feature for all LIFELINE-associated service plans.
- 2) There will not be any billed cost for this service to LIFELINE-associated cell phone numbers.
- 3) Because there will be no cost to these individuals, it will also eliminate the need to opt-in for this service, just as it is not necessary to opt-in for 911 services.
- 4) All that will be needed by *FAST* for immediate implementation is a simple listing of all LIFELINE-associated cell phone numbers from each cell phone carrier so the service can automatically be added to those numbers.
- 5) Available funds from the Universal Service Fund will be allocated to support the *FAST* system at a cost of .05 per month per active LIFELINE-associated cell phone number. Payment to *FAST* would be due by the 15th of the month prior to service.
- 6) All Government agencies will have access to the online training tools provided by First Alert System Text Corporation in order to insure proper and secure administration of the National Emergency Alert Service system.
- 7) All Schools will have access to the online training tools provided by First Alert System Text Corporation in order to insure proper and secure administration of the National Emergency Alert Service.

- 8) An informational campaign directed to the LIFELINE-associated cell phone users will announce the inclusion of this feature on their cell phones. Concurrently, an informational campaign directed to all appropriate agencies, both public and private, will notify them of free administrative access to this National Emergency Alert Text Messaging System
- 9) Inherent to the *FAST* system will be the ability to target delivery of these alerts to specific zip codes, and for the individual cell phone user to specify those zip codes for which he/she would like to receive such alerts. By default, the billing zip code of the cell phone number will be automatically set up. An individual will be able to change their profile (i.e. add zip codes) through the FAST website www.firstalerttext.com or directly via their cell phone.
- 10) Inherent to the *FAST* system will be the ability for any entity to establish specific groups within that entity to receive proprietary alerts. The administrator for that entity will have the capability of setting up as many groups and subgroups as required for their purposes.

In summary, I appreciate the opportunity to submit this petition to the FCC for its immediate consideration. It is my sincere belief that implementation of this program will demonstrate the present administration's commitment to swiftly achieving change for a safer and better informed America. If you have any questions, please feel free contacting me anytime.

Respectfully submitted,



Robert Craddock
CEO, First Alert Systems Text Corporation

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