



April 20, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PS Docket No. 08-146
Request for Waiver and/or Extension of CMAS Deployment Date
American Messaging

Dear Ms. Dortch:

On September 2, 2008, American Messaging Services LLC notified the Federal Communications Commission (“Commission”) of its election to participate in the Commercial Mobile Alert System (“CMAS”) and transmit emergency alerts to its subscribers. *See* 47 C.F.R. § 10.210(a). Although American Messaging has been working diligently to implement the technology necessary to carry CMAS alerts to its subscribers, it has not yet achieved the capability to do so. Among other things, additional programming changes are necessary to ensure proper implementation of CMAS. As American Messaging began updating its internet servers to access the data necessary for CMAS, it discovered technical issues that must be fixed and tested prior to implementing additional updates necessary for the provision of CMAS. Once these programming and technical changes are finalized, American Messaging can complete the necessary updates and engage in testing with the Federal Emergency Management Agency (“FEMA”). Based on the experience of other carriers, however, American Messaging anticipates additional delays associated with negotiating the necessary agreements with FEMA to engage in such testing.

Many carriers that initially opted to participate in CMAS were unable to launch on April 7, 2012 as the Commission intended. Because of implementation issues, a number of carriers changed their elections to non-participating carriers. American Messaging remains committed to the CMAS program, however, and intends to begin delivering alerts to its customers as soon as possible. Thus, rather than change its election, American Messaging respectfully requests a waiver of the April 7, 2012 deadline and an extension until June 30, 2012 to begin providing CMAS alerts to subscribers. This approach will serve the public interest by ensuring the rapid deployment of CMAS, while at the same time avoiding consumer confusion that invariably will arise from carriers changing their elections – from participating to non-participating while they

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continue the implementation process, and then back to participating once the implementation process is completed.

Should there be any questions, please do not hesitate to contact American Messaging's counsel:

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Sincerely,

/s/ Roy Pottle
Roy Pottle
Chairman and CEO