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August 18, 2017

Via Email

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte – Wireless Emergency Alerts -- PS Docket No. 15-91

Dear Ms. Dortch:

On August 16, 2017, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Wireless Technologies and Systems Committee (WTSC) met via telephone with representatives of the Commission's Public Safety & Homeland Security Bureau (PSHSB) and Enforcement Bureau (EB). During the meeting, ATIS provided input in response to questions from PSHSB on technical issues associated with Wireless Emergency Alerts (WEA). ATIS' input provided further detail regarding issues addressed in ATIS' comments in response to the Commission's November 9, 2016, *Notice of Proposed Rulemaking* in the above-referenced docket.

ATIS noted its concerns with the feasibility of the Commission's proposed geo-targeting accuracy standard, which would require 100% of the targeted devices within the specified alert area to receive the alert with no more than 0.10-mile overshoot. ATIS does not believe that this standard is achievable based on existing cell site technology. Another technical issue that may prevent compliance with this standard is that fact that there is no way to absolutely know a device's location in all circumstances. For instance, the device's location functionality may be turned off and, even if it is turned on, the location may not be accurate.

ATIS further noted that network congestion issues may arise if devices don't have a current location or if the location is dated/aged and must be updated. It was also noted that there are battery and privacy-related issues associated with the Commission's proposed standard. While ATIS agreed with the Commission that applying any mandated accuracy standards only to devices with location services enabled could address some technical issues, this proposal would not be 100% effective as there are many variables that may impact a device's ability to determine its location.

The Commission also asked about the capabilities to address multilingual WEA messages. ATIS noted that there are concerns with ensuring that the messages are accurately translated; this is particularly important if the devices are translating WEA messages into other languages. There may also be technical challenges depending on the number of languages that would need to be supported.

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Finally, the issue of alert caching was discussed. The Commission asked for input on a proposed approach that would require devices to cache WEA messages so that customers who have opted out of receiving these messages would be able to view past messages in some manner. ATIS noted that it would need to study this issue further.

ATIS noted it continues to study geotargeting and other issues addressed during the meeting and will update the Commission on this work when it has further progressed.

In attendance representing the FCC were Marcus Brown (PSHSB), Megan Henry (PSHSB), Linda Nagel (EB), Rasoul Safavian (PSHSB), Emily Talaga (PSHSB), and James Wiley (PSHSB). In attendance representing ATIS WTSC were Thomas Goode (ATIS), Brian Daly (AT&T), Farrokh Khatibi (Qualcomm), Charles Peter Musgrove (AT&T), Greg Schumacher (Sprint), and Mark Younge (T-Mobile).

A copy of this letter is being submitted on the record of the above-referenced docket. If there are any questions, please contact the undersigned.

Sincerely



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ATIS General Counsel

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