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January 5, 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:

The Alliance for Telecommunications Industry Solutions (ATIS) Wireless Technologies and Systems Committee (WTSC) has reviewed the December 21, 2017, *ex parte* filed by CTIA related to device-based geo-targeting. In this *ex parte*, CTIA notes that new standards will be necessary in order to implement this new functionality. ATIS WTSC agrees that further evaluation of this issue and the development of new standards, as well as updates to numerous existing standards, would be needed because device-based geo-targeting will use cell broadcast technology in a different way than it is currently being used for WEA.

Below are the standards that would need to be modified or developed. Each of these standards addresses one or more components in the WEA system from the C interface through the network to the device. In addition, changes to the OASIS specifications that define the CAP protocol from the alert originators to IPAWS would need to be considered. ATIS WTSC cautions that the list below may not be exhaustive, as WEA is based on a very complex system that requires standards for interoperability and roaming; changes to these roaming/interoperability standards also may be necessary.

**New/Modified Standards Associated with Device-Based Geo-Targeting**

- Enhanced Wireless Emergency Alert (eWEA) via GSM/UMTS Cell Broadcast Service Specification (ATIS-0700006.v002)
- Cell Broadcast Entity (CBE) to Cell Broadcast Center (CBC) Interface Specification, Revision 2 (ATIS-0700008.v002) (assuming that the merging of the message text and the polygon into one field occurs upstream from the CBC)
- Enhanced Wireless Emergency Alert (eWEA) via EPS Public Warning System Specification (ATIS-0700010.v002)
- Enhanced Wireless Emergency Alert (eWEA) International Roaming Specification (ATIS-0700025.v002)

- Enhanced Wireless Emergency Alert (eWEA) Service Description (ATIS-0700035)
- Enhanced Wireless Emergency Alert (eWEA) Mobile Device Behavior (MDB) Specification (a revised version of J-STD-100) (ATIS-0700036)
- Enhanced Wireless Emergency Alert (eWEA) Federal Alert Gateway to CMSP Gateway Interface Specification (a revised version of J-STD-101) (ATIS-0700037) (assuming that the merging of the message text and the polygon into one field occurs upstream from the CMSP Gateway)
- Enhanced Wireless Emergency Alert (eWEA) Federal Alert Gateway to CMSP Gateway Interface Test Specification (a revised version of J-STD-102) (ATIS-0700038) (assuming there are modifications to the ATIS-0700037 C-Interface Spec)
- Technical realization of Cell Broadcast Service (CBS) (3GPP TS 23.041)
- Public Warning System (PWS) Requirements (3GPP TS 22.268)
- Common Alerting Protocol, v. 1.2 Standard (OASIS)
- Common Alerting Protocol, v. 1.2 USA Integrated Public Alert and Warning System (IPAWS) Profile Version 1.0 (OASIS)
- New ATIS and 3GPP specifications for device-based geo-targeting APIs
- New ATIS specification for end-to-end test and verification for device-based WEA geo-targeting
- New ATIS specification for device-based geo-targeting WEA message content

As the list above demonstrates, significant standards work will be necessary to address technical issues associated with device-based geo-targeting. ATIS WTSC anticipates that this effort will take 12-18 months.

The industry continues to work in WTSC to resolve important technical issues related to WEA. In addition to the development of standards for device-based geo-targeting, the industry is working to update the ATIS and 3GPP WEA-related standards to address enhancements for 360-character messages, Spanish-language messages, public safety messages, state/local testing, etc. ATIS WTSC will provide further updates to the Commission on its progress to enhance WEA.

A copy of this letter is being filed in the above-referenced docket.

If there are any questions, please contact the undersigned.

Sincerely,



Thomas Goode  
ATIS General Counsel

cc: James Wiley, Attorney Advisor  
Megan Henry, Attorney Advisor  
Rasoul Safavian, Senior Technical Advisor