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January 24, 2020

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

Re: Improving Wireless Emergency Alerts and Community-initiated Alerting
Ex Parte, PS Docket No. 15-91

Dear Ms. Dortch:

The Alliance for Telecommunications Industry Solutions (ATIS) Wireless Technologies and Systems Committee (WTSC) is writing to express its support for the Federal Communications Commission's decision granting a waiver of Section 10.450(a) of the Commission's Wireless Emergency Alert (WEA) rules.¹ The waiver was granted in response to a request from the United States Geological Survey (USGS) and permits Participating Commercial Mobile Service (CMS) Providers to forego enhanced geotargeting and deliver earthquake early warning (EEW) alerts initiated by USGS to an area that "best approximates" the target area.

ATIS agrees with USGS and the Commission that the delays associated with device based geofencing (DBGF) processing time would make use of this function inappropriate for EEW. ATIS therefore applauds the Commission's decision to allow the use of the DBGF Bypass Request by the USGS for EEWs.² The DBGF Bypass Request was specified in WEA 3.0 to allow any Alert Originators the option of evaluating, in conjunction with the needs of a given alert, the benefits of the bypass over the benefits of performing DBGF.

ATIS further recommends the Commission extend the waiver to all WEA Alert Originators beyond USGS to allow the use of the DBGF Bypass Request capability for other alerts as determined by the Alert Originators.

Finally, ATIS would like to offer some additional technical input regarding DBGF timing. ATIS notes that, in the *Order*, the Commission cites ATIS' standard on *Wireless Emergency Alerts (WEA) 3.0: Device-Based Geo-Fencing (WEA 3.0)*,³ which explains that "the geofencing process can take as long as 255 seconds (i.e., 4 minutes and 15 seconds)."⁴ While it is true that the

¹ *Order*, PS Docket 15-91 (released September 23, 2019).

² *Order*, ¶7.

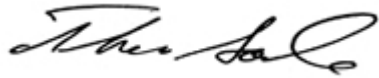
³ *Wireless Emergency Alerts (WEA) 3.0: Device-Based Geo-Fencing* (ATIS-0700041). This document is available from https://www.techstreet.com/atis/standards/atis-0700041?product_id=2044514.

⁴ *Order*, ¶4.

maximum DBGF process time specified in the standard is more than four minutes, ATIS notes that the process time limit in practice is substantially shorter.

If you have any questions about this matter, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is written in a cursive style with a large, looping initial "T".

Thomas Goode
ATIS General Counsel