April 7, 2023

James Wiley
Public Safety and Homeland Security Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Update on ATIS Work to Form Recommendations for an Order of Efforts

Dear James:

On behalf of the Alliance for Telecommunications Industry Solutions (ATIS), I would like to provide an update on ATIS' work to address the recommendations from the Communications Security, Reliability and Interoperability Council VIII (CSRIC VIII) Working Group 6: WEA Application Programming Interface.

In its *Report on WEA Application Programming Interface*, CSRIC VIII Working Group 6 recommended that ATIS collaborate with all WEA Stakeholders to form recommendations for an order of efforts to prioritize the standards work identified in the report.  The report further recommended that ATIS provide these recommendations within six (6) months of the acceptance of this report.

ATIS is pleased to report that, immediately following adoption of the Working Group 6 report by CSRIC VIII, the ATIS Wireless Technologies and Systems Committee Wireless Emergency Alerting working group (ATIS WEA) drafted an Issue Statement for this task. This Issue Statement, which is a required first step in the development of a deliverable, was supported by key WEA stakeholders, including commercial mobile service providers, FEMA, Alert Originators, and vendors, and was adopted by ATIS WEA on March 24, 2023, as Issue 98.  It is attached to this letter for your reference.

It was ATIS WEA's intent to immediately begin its efforts in order to complete this work by the six-month deadline recommended by CSRIC VIII.  However, ATIS is now aware of and has begun review of the draft *Further Notice of Proposed Rulemaking* (*FNPRM*) that the Commission is proposing to adopt at its April 20, 2023, Open Meeting. ATIS notes that the *FNPRM* addresses topics that are relevant to ATIS standards and would require modification of these standards.  The *FNPRM* would also impact industry design efforts and deployments based on those standards.  ATIS WEA thus will need to closely evaluate and address the issues raised in the *FNPRM*.

Given the need to address the issues raised in the *FNPRM* during the appropriate comment and reply comment periods and the fact that the same subject matter experts will be needed for this task and the Issue 98 effort, ATIS WEA cannot analyze and prepare its comments to the *FNPRM* and complete its work on Issue 98 in parallel.  ATIS WEA intends to reprioritize its work to
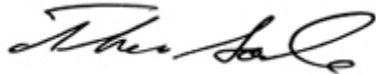
respond to the *FNPRM*. This will very likely result in a delay in the task recommended by CSRIC VIII. The impact on this work will not be known until we understand the timelines for the *FNPRM*. Had ATIS been aware of the Commission's intention to issue the *FNPRM*, it would have recommended different completion dates for the task identified in the CSRIC VIII Working Group 6 report and captured in Issue 98.

ATIS WEA also notes that it has begun its examination of additional language support for WEA, an issue that is addressed in the *FNPRM*. While ATIS WEA is encouraged by what appears to be alignment between the proposed direction of ATIS work on this issue and the *FNPRM*, it notes that ATIS WEA's efforts will need to be diverted from pursuing additional language support to addressing the *FNPRM*.

ATIS looks forwards to continuing its work with the Commission to address WEA enhancements. A copy of this letter has been filed in PS Docket Nos. 15-91 and 15-94.

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

Regards,

Thomas Goode
ATIS General Counsel

cc:     Tara Shostek, Commission Representative to CSRIC VIII Working Group 6
        Farrokh Khatibi, CSRIC VIII Working Group 6 Co-Chair
        Francisco Sanchez, CSRIC VIII Working Group 6 Co-Chair
        Mark Younge, ATIS WTSC Chair
        Peter Musgrove, ATIS WTSC Vice Chair
        Terri Brooks, ATIS WTSC SN Chair
        Jackie Wohlgemuth, ATIS Director, Global Standards Development
        Anna Karditzas, ATIS Coordinator, Global Standards Development

| Issue Title: | Assessment of Work Efforts for CSRIC Recommendations |
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| Forum/Committee: | WTSC | Issue Number: | 0098 |
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| Committee/Subcommittee Assigned: | WEA | Issue Status: | |
| Submission Date: | 3/24/2023 | Initial Closure/Initial Pending Date: | |
| Acceptance Date: | 3/24/2023 | Target Date for Moving Issue to Final From Initial Closure or Initial Pending: | |
| Targeted Resolution Date: | 3Q2023 | Final Closure Date: | |

**Issue Statement/Business Need:**

CSRIC VIII has approved a list of recommendations describing potential enhancements to WEA. Associated estimates for standardization and time-to-field are included; however, these estimates represent the timeline for each potential enhancement when considered in isolation. If more than one of the potential enhancements are pursued, and specifically where standards, development, and deployment efforts have to be performed in parallel, these parallel efforts will impact the timeline estimates provided by CSRIC VIII.

Solution options were discussed which range from minimal impact up to significant impacts to, or even redesign of, the current WEA system. In addition, each potential enhancement involves input from consultation with SMEs, collaboration among the involved stakeholders, studies on social aspects/impacts, or a combination of these.

CSRIC VIII was unable, within the time allowed, to consider and offer recommendations on the organization, prioritization, or ordering, of these efforts, and has asked that ATIS WEA work with AOs and other relevant experts to form these recommendations. This information is viewed as part of the input to the FCC's decision-making process for both which enhancements to pursue and in which order, and achievable standards development and field deployment timing. CSRIC VIII has asked that ATIS complete this exercise within six months.

**Suggested Solution:**

ATIS WEA, in collaboration with appropriate stakeholders and experts, should review the CSRIC VIII report and offer additional insight into the effort level of the tasks identified for each potential enhancement, as well as offering further clarification, as needed and applicable, of the stakeholder impacts. "Effort level", as used here, includes both a description of the resources involved and a length of time to complete each task based on the expected task output. This information is expected to assist in determining where overlapping efforts may impact the estimated timelines (i.e., similar resources needed). Note this is a scoping effort only and is not a requirements or standards development of the proposals from CSRIC. Standards efforts are dependent on FCC rulemaking.

Due to the short timeframe, ATIS should establish a dedicated group directory to facilitate collaboration. This will allow the work to be streamlined while avoiding delays in engaging the additional stakeholders and experts.

**Resolution Statement:** *To be provided at the publication of the deliverable or Initial/Final Closure of the Issue (e.g., the publication of ATIS-1000025 provides the Resolution to this Issue).*

**Associated Committees/Issues:** *Identify other impacted or relevant groups and/or Issues that may have an interest in or are related to this topic, including groups with whom correspondence should be sent to communicate this Issue.*

**None**

**Related areas of consideration for the solution to be complete and implementable by the industry:** *Consider functional platform; interoperability; performance, reliability, and security; OAM&P; ordering and billing; user interface work and environmental sustainability.*

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**Activity Log:** The meeting date and document number of the relevant meeting record(s).

| Date | Meeting Record (Document Number) |
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