



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

September 10, 2020

Tom Goode  
General Counsel  
Alliance for Telecommunications Industry Solutions  
1875 Connecticut Ave NW  
Washington, DC 20009  
[tgoode@atis.org](mailto:tgoode@atis.org)

Re: Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91, 15-94

Dear Mr. Goode:

As you know, Wireless Emergency Alerts (WEA) are a critical tool for federal, state, and local officials to warn the public about imminent threats, such as tornadoes and hurricanes, and missing children. These alerts are useful to emergency managers and the public only if they can be accurately delivered to the targeted geographic area. Wireless providers rely on Alliance for Telecommunications Industry Solutions (ATIS) standards to comply with the FCC's enhanced WEA geo-targeting requirement, which specifies that alerts must be delivered to 100 percent of the target area with no more than a one-tenth of a mile overshoot. I am pleased to learn that ATIS is continuing to improve upon its enhanced WEA geo-targeting standards by tasking its Wireless Technologies Systems Committee with producing a white paper on WEA cell broadcast facility selection in 3Q2020.

This effort presents an opportunity for further progress. ATIS' WEA standards specify a range of permissible values for wireless providers and equipment manufacturers to use as parameters for enhanced WEA geo-targeting, particularly when mobile devices are in motion.<sup>1</sup> In this regard, I am writing to request that ATIS task its Wireless Technologies Systems Committee with producing best practices that refine these discretionary parameters to further improve enhanced WEA geo-targeting. These best practices should consider and address the following:

1. The recommended frequency with which wireless providers' networks retransmit WEAs;
2. The recommended number of location checks that WEA-capable mobile devices should perform when determining whether to display a WEA;
3. The recommended number of seconds that WEA-capable mobile devices should wait to get a fix on their location during each location check; and

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<sup>1</sup> See ATIS, WEA 3.0 via EPS Public Warning System Specification, ATIS-0700010.v003 at Section 7.5.6 (2019) (leaving the repetition rate for WEAs and location checks for the purpose of supporting enhanced geo-targeting to Participating CMS Provider discretion); ATIS, WEA 3.0 Device-Based Geo-Fencing, ATIS-0700041, Section 5.2.8 (2019) (permitting mobile devices to wait anywhere from 0 to 255 seconds (*i.e.*, 4 minutes and 15 seconds) to determine their location relative to the target area specified by the alert originator prior to displaying the alert). Compare WEA 3.0 Mobile Device Behavior (MDB) Specification, ATIS-0700036.v002, Section 7.1 (2019) (stating that "[w]hen the mobile device is active in voice or data session on a 2G or 3G network, the mobile device is not required to receive any WEA message. However, when the mobile device is active in a voice or data session on an LTE network, the mobile device shall attempt to receive WEA messages.") with 47 CFR § 10.450(a) ("A Participating CMS Provider is considered to have matched the target area when they deliver an Alert Message to 100 percent of the target area").

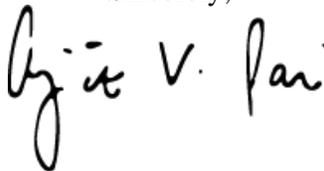
4. The recommended processes to ensure that WEA-capable mobile devices display WEAs received during active voice or data sessions when the device is located within the targeted geographic area.

Please invite representatives from the alerting and public safety communities to participate in developing these best practices to take advantage of their experiences with the introduction of enhanced WEA geo-targeting. Please also consider publishing these best practices by 2Q2021 so as not to delay the important work and planned publication of the Committee's aforementioned white paper.

By October 1, 2020, please file your response to this request for such a commitment in the Commission's Electronic Comment Filing System (ECFS) in the above-referenced dockets and email a courtesy copy to [James.Wiley@fcc.gov](mailto:James.Wiley@fcc.gov).

Thank you for your continued efforts to ensure that the public receives life-saving WEA messages.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai". The signature is written in a cursive, slightly slanted style.

Ajit V. Pai