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November 5, 2018

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

Re: Device-Based Geotargeting

Ex Parte Notification - PS Docket Nos. 15-91, 15-94

Dear Ms. Dortch:

On November 1, 2018, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Wireless Technologies and Systems Committee (WTSC) met by teleconference with Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Pai, and Lisa Fowlkes, Chief, Public Safety Homeland Security Bureau, to discuss the development of standards related to WEA geotargeting capabilities.

During the call, ATIS WTSC explained that the industry is advancing several standards required to implement new WEA capabilities (collectively known as WEA3.0). ATIS further explained that the basic underlying architectural approach for using cell broadcast to send the alert area (i.e., polygon) to a mobile wireless device capable of supporting enhanced geo-targeting has been agreed to and is in process of being added to the draft ATIS standards (building on recently-accepted 3GPP Release 15 changes). The focus of this standards work so far has been on the transport of the alert message via the System Information Block 12 Information Element - SIB12 IE.

However, significant work is necessary and ongoing to enable an end-to-end enhanced WEA geo-targeting solution for wireless devices capable of supporting enhanced geo-targeting. For example, requisite standards are being developed that define the WEA message format to deliver the polygon, as well as device behavior specifications to address location uncertainty.

Specifically, one of the challenges that the industry has uncovered in its work with the alert originator community to develop these standards is the need to define the behavior of devices as they move from outside the polygon to inside the polygon during the WEA broadcast. This is a complex issue and a significant number of proposals have been contributed, each of which has different potential impacts to standards, networks, and devices, and require more time to develop a consensus with the alert originator community. For these reasons, ATIS anticipates that the WEA3.0 standards will be completed by the end of the first quarter of 2019.

Depending on the outcome of the technical discussions for the WEA 3.0 advanced geo-targeting capability, ATIS cautioned that further recommended changes to 3GPP specifications may be required. Should there be additional changes to 3GPP specifications, these would be proposed as part of Release 16 of the 3GPP specifications and could take 2 to 4 months to be approved by 3GPP. However, to expedite this matter, the industry would look to initiate this change process as soon as possible and would not need to wait until ATIS publishes its standards to start the 3GPP change request process.

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ATIS reiterated that, until the industry completes its evaluations of the different proposals, it will be impossible to fully understand the standards-related impacts and associated timing-related impacts. Also, ATIS noted that, once the standards are completed, there will be additional time needed by the industry, including original equipment manufacturers (OEMs), to implement the standards. While it cannot be accurately estimated until standards are complete, based on similar development cycles, it is estimated that this could take between 12-18 months after completion of the standards.

On the call representing ATIS WTSC were: Brian Daly, AVP Standards & Industry Alliances, AT&T; Steve Barclay, ATIS Senior Director of Global Standards Development; and Thomas Goode, ATIS General Counsel.

A copy of this notification will be filed in the above-referenced dockets. If you have any questions, please do not hesitate to contact me.

Sincerely,

Thomas Goode

ATIS General Counsel

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Cc: Zenji Nakazawa, Public Safety and Consumer Protection <u>zenji.nakazawa@fcc.gov</u> Lisa Fowlkes, Chief, Public Safety Homeland Security Bureau lisa.fowlkes@fcc.gov