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December 14, 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:

On December 12, 2017, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) met with representatives from the Public Safety and Homeland Security Bureau to discuss ATIS Wireless Technologies and Systems Committee's (WTSC) work related to Wireless Emergency Alerts (WEA).

During this call, compression techniques were discussed. ATIS WTSC noted that it was familiar with and had reviewed the Carnegie Mellon University SVC study that was funded by the U.S. Department of Homeland Security Science and Technology (S&T) Directorate, as well as the 3GPP TS 23.042 specification ([http://www.3gpp.org/ftp//Specs/archive/23\\_series/23.042](http://www.3gpp.org/ftp//Specs/archive/23_series/23.042)), and others related to this topic. ATIS WTSC noted that, while it recognizes that some compression for including the polygon and text within WEA messages is needed, further study on this issue within ATIS WTSC is necessary to select the appropriate compression algorithm(s).

The ATIS White Paper, *Feasibility Study for LTE WEA Message Length* (ATIS-0700023), was also discussed. It was noted that this study indicated that an increase in the number of display characters would require the transmission of additional WEA message segments, which in turn would increase the transmission delay. ATIS WTSC explained that delay was not the only reason that the industry was supportive of the 360-character limit. Device battery life and the health of the cellular system during an emergency situation also played critical roles in that decision.

The impact of proposed device-based geo-targeting rules on legacy wireless devices was also discussed. ATIS explained that device-based geo-targeting would require fundamental changes to existing cell broadcast technology. While a full analysis of the changes needed to satisfy any new regulatory requirements will be necessary, ATIS believes that device-based geo-targeting would require devices to:

- Receive, but not automatically display, the cell broadcast message;
- Pass the message via a new API to a new device-based WEA application;
- Parse the received message to identify the compressed polygon coordinates;
- Decompress those coordinates;

- Determine the device's current location;
- Compare the device location to the polygon provided in the message; and
- Display the WEA text message contained in the cell broadcast message if it is determined that the device is within the polygon.

The determination of whether and how device-based geo-targeting could be accommodated in existing handsets will be examined by the industry, although ATIS noted that it is likely that some legacy devices will not be able to support the changes via a software upgrade. Changes to the network and to the alert originator capabilities would also be required, as would new standards.

On the call representing ATIS WTSC were: Greg Schumacher, Sprint; Peter Musgrove, AT&T; Brian Daly, AT&T; Gary Jones, T-Mobile; Eric Hagerson, T-Mobile; Mark Younge, T-Mobile; Farrokh Khatibi, Qualcomm; Xiaomei Wang, Verizon; Steve Barclay, ATIS Director of Global Standards Development; and Thomas Goode, ATIS General Counsel. Representing the PSHSB on this call were: James Wiley, Attorney Advisor; Megan Henry, Attorney Advisor; and Rasoul Safavian, Senior Technical Advisor.

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