

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
The Commercial Mobile Alert System)	PS Docket No. 07-287
)	
)	

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY
SOLUTIONS' WIRELESS TECHNOLOGIES AND SYSTEMS COMMITTEE**

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of the Wireless Technologies and Systems Committee (WTSC), submits these comments in response to the Federal Communications Commission's (Commission) *Notice of Proposed Rulemaking (NPRM)* released December 14, 2007, in the above referenced docket.¹ ATIS is filing these comments to make the Commission aware of its work in leading the development of technical standards, protocols and procedures in compliance with the October 12, 2007, recommendations of the FCC's Commercial Mobile Service Alert Advisory Committee (CMSAAC) established in December 2006 pursuant to the WARN Act².

¹ In the Matter of the Commercial Mobile Alert System, PS Docket No.07-287, *Notice of Proposed Rulemaking*, FCC 07-214 (rel. December 14, 2007).

² Section 602(a) of the WARN Act requires that the Commission adopt technical standards, protocols, procedures and other technical requirements that will enable commercial mobile service (CMS) alerting capability for CMS providers that voluntarily elect to transmit emergency alerts. See Security and Accountability For Every Port Act of 2006 (SAFE Port Act), Pub. L. 109-347, Title VI-Commercial Mobile Service Alerts (WARN Act).

I. Background

ATIS is a technical planning and standards development organization accredited by the American National Standards Institute (ANSI) and committed to rapidly developing and promoting technical and operational standards for communications and related information technologies worldwide using a pragmatic, flexible and open approach. The ATIS membership spans all segments of the industry, including local exchange carriers, interexchange carriers, wireless equipment manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, providers of commercial mobile radio services, broadband providers, software developers, and internet service providers. Industry professionals from more than 300 communications companies actively participate in ATIS' open industry committees and other forums.

ATIS' WTSC coordinates, develops and recommends standards and technical reports relating to wireless/mobile telecommunications networks. The WTSC also reviews and prepares contributions on such matters for submission to the appropriate United States preparatory body for consideration as International Telecommunication Union contributions or for submission to other domestic and regional standards organizations. The WTSC works on issues involving the radio and non-radio mobile technology aspects of the GSM air interface suite, including radio frequency issues that impact IMT-2000 systems and systems beyond IMT-2000, radio access technologies, and IP-based technologies. WTSC's work includes strong coordination and liaison with 3GPP³ and other relevant international standards bodies.

³ Third Generation Partnership Project (3GPP) established in December 1998 is a collaborative agreement among six international telecommunications standards bodies known as Organizational Partners. ATIS, as one of the Organizational Partners, actively participates in 3GPP's projects, which are aimed at providing globally applicable technical specifications for a 3rd Generation and beyond Mobile System based on the evolved 3GPP core networks.

ATIS' WTSC shares the Commission's commitment to improve public safety by ensuring the rapid distribution of emergency alerts to wireless communication subscribers. ATIS' WTSC believes that development of appropriate technical standards and procedures for implementing a commercial mobile alert system is paramount to accomplish the Commission's goal. To this end, ATIS WTSC is working with other standards development organizations and key stakeholders to address the technical issues and develop these standards.

II. Discussion

In the *NPRM*, the Commission seeks comment on the CMSAAC recommendations and the technical standards, protocols, procedures and other requirements that should be adopted to meet the WARN Act's objective of transmitting emergency alerts using commercial mobile services.⁴ Under the CMSAAC's proposed Commercial Mobile Alert System (CMAS), a Federal government entity would act as the "Alert Aggregator" that would receive, aggregate, and authenticate alerts originated by authorized alert initiators.⁵ This entity would also serve as an "Alert Gateway" that would generate alerts based on commercial mobile service provider (CMSP) profiles and then transmit the alerts to CMS provider "Gateways" across a secure interface.⁶ The CMS provider Gateway would transmit the alerts to the participating CMS providers' infrastructure which, subsequently, would send the alert to a subscriber's mobile device.⁷

ATIS served as a member of the CMSAAC and helped develop the recommendations now before the FCC. ATIS supports the Commission's goal of ensuring that "all Americans

⁴ *NPRM* at ¶ 6.

⁵ *NPRM* at ¶ n. 21. *See also* CMSAAC recommendation at section 1.1.1.

⁶ *Id.*

⁷ *Id.*

have the capability to receive timely and accurate alerts, warnings and critical information regarding impending disasters and other emergencies irrespective of what communications technologies they use.⁸ ATIS believes that the adoption of the CMSAAC recommendations in their entirety is the best way to accomplish this goal, as these recommendations appropriately address the myriad of issues involved in deploying emergency alert capabilities in commercial mobile services as intended by the WARN Act.

ATIS' WTSC is leading the development of the multiple industry technical standards needed for wireless devices to support the implementation of a single nationwide Commercial Mobile Alert System (CMAS). ATIS, in coordination with Telecommunications Industry Association (TIA), has begun drafting two interface standards⁹ that address the CMSAAC technical recommendations. The first standard addresses CMSAAC's Reference Point "C"¹⁰, which involves defining the protocol to be used between the government-controlled Alert Gateway and the CMSP Gateway. The second standard relates to the CMSAAC's requirements for mobile device functionality and a standard approach to how the subscriber's mobile device reacts upon receipt of a commercial mobile alert message.

In addition to the joint ATIS/TIA efforts, ATIS is independently developing a standard that addresses CMSAAC's Reference Point "E"¹¹, which will define how the cell broadcast protocol will interface between the CMSP infrastructure and GSM/UMTS mobile devices.

ATIS' WTSC anticipates completing the aforementioned standards by the fall of this year. ATIS' WTSC urges the FCC to encourage government stakeholder participation in the

⁸ *NPRM* at ¶ 3.

⁹ Under the ATIS/TIA joint standards process, the lead organization (in this case ATIS) identifies the issue to be worked and ensures compliance with all agreed upon procedures so that the final document represents the consensus of both organizations.

¹⁰ See CMSAAC recommendation at section 10.3

¹¹ See CMSAAC recommendation at section 10.4.4


standards development process, specifically in the development of the interface standard related to CMSAAC's Reference Point "C".

III. Conclusion


ATIS' WTSC urges the Commission to expeditiously adopt the recommendations of the CMSAAC without addition or modification. Deviations from the CMSAAC recommendations would delay the standardization process and the availability of the CMAS services to the public.

Respectfully submitted,

ATIS on behalf of WTSC

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