

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Amendment of Part 11 of the) PS Docket No. 15-94
Commission’s Rules Regarding the)
Emergency Alert System)
) PS Docket No. 15-91
Wireless Emergency Alerts

**COMMENTS OF THE ALLIANCE FOR
TELECOMMUNICATIONS INDUSTRY SOLUTIONS**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Notice of Proposed Rulemaking (NPRM)*, released March 19, 2021, in the above-referenced dockets. In the *NPRM*, the Federal Communications Commission (Commission) proposes to implement the relevant provisions of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021¹ by, among other things, renaming “Presidential” Wireless Emergency Alerts (WEA or Alert)” as “National” Alerts. ATIS is pleased to have this opportunity to provide comments on the technical- and standards-related impacts associated with this proposal.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS’ diverse membership includes key stakeholders from the Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software

¹ See National Defense Authorization Act of 2021, Pub. L. 116-283, 134 Stat. 3388, § 9201(a) (NDAA21).

developers, consumer electronics companies, public safety agencies, and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees and incubator solutions programs.

ATIS' Wireless Technologies and Systems Committee (WTSC) develops wireless radio access, system, and network solutions related to wireless and/or mobile services and systems. WTSC develops and continues to enhance solutions necessary to support a U.S. public warning system and WEA system. ATIS is the 3GPP North American partner, and WTSC provides critical technical review and input for necessary contributions.

II. COMMENTS

In the *NPRM*, the Commission seeks information about the technical impacts associated with its proposal to rename “Presidential Alerts” to “National Alerts.”² The Commission asks specifically about the kinds of technical changes that participating service providers would experience in complying with the proposed requirement to display either the proposed “National Alert” or no heading at all.³ While ATIS WTSC has identified no impacts to chipsets or service provider networks that are necessary to accommodate the proposed label change, there would be an impact to the mobile device WEA client. To accommodate the proposed label change, a device must translate the received message ID (previously associated with “Presidential” alert) into either: (1) an appropriate label (e.g., “National” or preferably “Federal” alert); or (2) no

² ATIS WTSC recommends that the Commission consider renaming “National Alerts” to “Federal Alerts” to better reflect that there will be some FEMA-generated alerts that may be regional or local in nature. Labelling such alerts as “national” could be confusing to consumers.

³ *NPRM* at ¶16.

label.⁴ It should also be noted that there will be devices that either cannot be upgraded to support the label change or currently do not provide any label. To avoid confusion, ATIS WTSC recommends that Alert Originators include text in the Alert explaining who has issued it (e.g., “The President has issued an alert...” or “FEMA has issued an alert...”).

The Commission seeks input regarding whether there are any technical alert transmission or presentation issues that could arise under its “National Alert” proposal that it has not previously identified.⁵ ATIS WTSC is not aware of any technical transmission issues associated with this proposal. Nor is ATIS aware of any presentation issues beyond those already identified and considered by the Commission, such as the fact that some mobile devices cannot be updated and will continue to display “Presidential Alert.”⁶ Changes throughout multiple existing WEA standards would be necessary to reflect the change in the name and display of the alert class; however, no changes are necessary in order to allow the ability for FEMA to begin sending alerts under the “Presidential Alert” class.

The *NPRM* seeks comment on whether the proposed National Alert class could support the transmission and delivery of geographically targeted WEA messages.⁷ ATIS WTSC notes that such geotargeting capabilities would be available. The “National” (preferably “Federal”) Alert class, being the same as the “Presidential Alert” class, is processed in the same manner and would have the same functionality, including the availability of device-based geofencing.

The Commission further asks whether any additional standards development would be required to ensure that FEMA can initiate, and participating CMS providers’ subscribers can

⁴ As noted by the Commission in the *NPRM*, either is acceptable under existing rules. *NPRM* at ¶16.

⁵ *NPRM* at ¶14.

⁶ *NPRM* at ¶¶16, 19.

⁷ *NPRM* at ¶14.

receive and display, such geographically targeted alerts.⁸ ATIS WTSC notes that, while changes to standards would be needed to support modification of the alert label from “Presidential Alert” to “National Alert,” no changes are required to ensure the reception and presentation of geotargeted alerts.

Finally, the Commission requests comment on whether there are any merits to creating a new alert message classification for FEMA Administrator alerts as an alternative to renaming “Presidential Alerts” as “National Alerts.”⁹ ATIS WTSC has identified no advantages to this alternative proposal and agrees with the Commission that this proposal would be inefficient and costly, and would require significant changes to industry standards, service provider gateways, radio access networks and mobile devices.¹⁰ Creating a new alert class would result in a significant number of mobile devices that are not capable of processing, and cannot be updated to support, the new alert class. Moreover, creating a new alert classification would unlikely meet the Commission’s desired implementation timeframe.¹¹ ATIS WTSC believes that the Commission’s proposal to rename the Presidential Alert provides a better solution that can be implemented in the desired timeframe.

⁸ *NPRM* at ¶14.

⁹ *NPRM* at ¶15.


¹⁰ *NPRM* at ¶15.

¹¹ As noted in the *NPRM*, the Commission proposes to require implementation by July 31, 2022. *NPRM* at ¶18. It would not be possible to meet this deadline for a new alert class, given the technology and standards changes that would be required.

III. CONCLUSION

ATIS appreciates the opportunity to provide its input to the *NPRM* and urges the Commission to consider the input above.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Thomas Goode".

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