



# INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

*Providing leadership for the fire and emergency services since 1873*

4025 FAIR RIDGE DRIVE • FAIRFAX, VA 22033-2868 • TEL: 703/273-0911 • FAX: 703/273-9363 • www.iafc.org

January 6, 2016

VIA ELECTRONIC FILING

Ms. Marlene Dortch  
Secretary, Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

**Re: Improving Wireless Emergency Alerts and Community-Initiated Alerting; Public Safety Docket 15-91**

Dear Ms. Dortch:

The International Association of Fire Chiefs (IAFC) represents 11,000+ fire and emergency medical services chiefs. The IAFC supports improving wireless emergency alerts for public safety, Public Safety Docket No. 15-91. The Notice of Proposed Rulemaking was published on December 14, 2015. 80 F.R. 77289.

Wireless Emergency Alerts (WEA) enable public safety officials to distribute emergency warnings and information to Americans on their mobile phones. Pursuant to federal legislation, the Federal Communications Commission (FCC) launched WEA in 2012. With three years' experience now available, the FCC is seeking public comment on ways to strengthen the WEA system. The FCC's primary goal is to encourage more state and local public safety authorities to use the WEA system by improving the clarity and accuracy of WEA messages.

The FCC's current rules limit WEAs to 90 characters and prohibit the inclusion of Uniform Resource Locators (URLs which are used for accessing websites and other resources) in WEA messages. Given these constraints, WEA messages typically combine a very brief "bell-ringer" alert with a message that users should "Check Local Media" for more information. The IAFC strongly supports expanding the maximum permissible length of WEA messages to 360 characters as proposed by the FCC.

It is our understanding that the current mobile alerts that WEA messages provide are an important public service, but their usefulness is limited by size, format and the capacity of cellular networks during emergencies. The IAFC is very supportive of the FCC efforts to improve the wireless alerts. We are in support of the amendment to Section 10.430 to expand the maximum permissible length of WEA messages to 360 characters of alphanumeric text. Expanding the message length would allow us to provide better, more detailed information in each alert, and reduce the total number of alerts needed to adequately notify our citizens of an emergency. It is the IAFC position that 90-character messages are

wholly insufficient to provide the level of information needed by the public in order to understand the scope of the emergency and take necessary precautions.

The FCC now proposes to allow the inclusion of URLs in WEA messages as well as expanding the number of characters. The IAFC understands that the URLs would drive users to the Internet for further information. The IAFC is concerned whether by doing so will further strain wireless networks that are already congested during an emergency, potentially impeding public safety communications and operations. The FCC needs to ensure that the site to which users are directed can handle increased traffic during an emergency. The FCC should caution alert originators to ensure that the websites and/or telephone numbers to which they are directing people for more information are prepared to handle the rapid influx of network and/or telephone traffic.

We understand from discussions with the National Association of Broadcasters that the radio industry has a plan which would add automatic URL links to WEA messages in order to access directly the over-the-air FM radio in the consumer's smartphone. Their belief is that this would give users a convenient way to obtain comprehensive, ongoing emergency information, such as the path of a tornado, escape routes, shelter-in-place instructions, or an accurate description of a missing child. Further, this approach will relieve the burden on cellular networks, leaving them open for more important emergency communications. FM radio-linked WEA messages would also allow consumers to avoid exhausting their data plans and battery life during emergencies.

The IAFC understands that almost all smartphones already contain an FM chip that allows users to access over-the-air radio, but not all providers and handset-makers activate those chips. If the FCC believes that this method of providing information makes sense, we urge the FCC to work with cellular carriers to work together to develop standard approaches for accessing FM radios in smartphones for WEA messages. We note that Craig Fugate, the Administrator of the Federal Emergency Management Agency has praised the value of radio-enabled smartphones during emergencies. Driving consumers to their FM radios after an alert may help relieve congestion on the wireless broadband network during times of emergency, freeing up vital capacity for emergency responders and others. We encourage the FCC to further explore the feasibility of use of this method to provide information to the public during an emergency.

The WEA system is a key emergency management tool and the IAFC fully supports enhancements to the system to increase public safety during emergencies. Please contact Jim Goldstein, the IAFC's Government Relations and Policy Manager, at 202-494-6607 or [jgoldstein@iafc.org](mailto:jgoldstein@iafc.org), if we can be of further assistance on this issue.

Sincerely,



Fire Chief Rhoda Mae Kerr, EFO, CFO, MBA  
President and Chair of the Board