

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

In the Matter of)	
)	
Wireless Emergency Alerts)	PS Docket No. 15-91
)	
Implementation of Multilingual Wireless Emergency Alerts)	PS Docket No. 15-94
)	

PUBLIC NOTICE

INITIAL COMMENTS OF SEVERAL COLORADO AGENCIES

The undersigned agencies, all of which are local alert originators in Colorado, submit these comments in response to the Public Notice concerning Wireless Emergency Alerts (“WEA”) and Implementation of Multilingual Wireless Emergency Alerts (“MWEA”) issued by the Federal Communications Commission on May 13, 2024:

1. The undersigned agencies are subject matter experts in 9-1-1, emergency management, emergency alerts and warning systems, disaster communication, accessibility, and public information. They have to be as Colorado has experienced numerous federally-declared disasters that have ranged from floods to fires to tornadoes. In 2020, Larimer County, Colorado sent 276 emergency evacuation orders in three months due to fires alone. The emergency events experienced throughout Colorado are often “no-notice” events, in which local alert originators are faced with rapidly developing and escalating emergency events. For example, on December 30, 2021, Boulder County’s Marshall Fire prompted nine evacuation orders in one day and resulted in the successful evacuation of approximately 35,000 people in two and one-half hours for what became Colorado’s most destructive fire in Colorado history. That has allowed the underlying agencies to develop significant experience with emergency alerts and has required the underlying

agencies to focus on community engagement and input respecting emergency events that plague Colorado.

2. Currently, the underlying agencies have robust alerting tools that allow for translating alerts, the trained personnel have a clear understanding of how to use these tools, the alerting tools have proven successful in providing timely and effective alerts, and allow for clear and concise messaging that is easy to understand and follow by the local communities the alert originators serve. The undersigned agencies have the capability to use templates in their local emergency alerting platform to preplan for emergency alerts and speed the decision point process. Importantly, the templates used in the local alerting tools have been carefully developed, including regionally important information, and are customizable during an emergency event to ensure the alert fits the scenario, is concise, and consistent with local public messaging.

3. As Colorado faces significant and frequent emergency events, it is important that alert originators in Colorado have access to clear, concise, quick, and efficient communication during an emergency to assist with emergency response coordination. More specifically, due to the unique geography in Colorado, and the substantial public information and community engagement undertaken by the undersigned agencies (and other alert originators in Colorado), the inclusion of regionally important information in emergency alerts is of the utmost importance. Accordingly, the undersigned agencies and other Colorado alert originators must maintain the capability, authority, and autonomy to issue and translate emergency alerts as they determine is necessary and effective for their jurisdictions.

4. In general, the undersigned agencies support the implementation of MWEA as set forth in the Public Notice, *so long as*, such implementation remains voluntary, alert originators are

able to opt out of using the proposed templates, and the implementation on CMS devices does not affect the ability of alert originators to issue alerts in the manner they currently have in place. The Public Notice is unclear if the WEA templates are, or may in the future become, a mandatory requirement of alert originators. While the Public Notice advises that CMS providers may elect to participate, and if they so elect, must adhere to the technical and operational requirements established by the Commission, it is unclear to the undersigned agencies whether alert originators may be mandated to implement WEA templates. *Public Notice* at 2. Should the voluntary aspects of this policy change, making the WEA templates a requirement for alert originators, there would be significant negative impacts to local authorities, including the undersigned agencies. For instance, the mandatory requirement to adopt the WEA templates would erode and diminish the effective emergency alert and warning translation systems the undersigned agencies currently have in place,

5. If the implementation of MWEA remains voluntary and does not affect local control or authority to issue alerts, the proposed fillable templates in Appendix D would be better than the templates in Appendix C. While the fillable templates do not offer enough latitude for the undersigned agencies (or other alert originators in Colorado), if other alert originators do not have the capability to issue and translate alerts, they may find that implementation of the fillable templates would be easier and more effective to suit the individual needs of the jurisdiction. The templates in Appendix C offer a limited reach, do not have concise and clear messaging, use terms that may not be generally acceptable to the locality they are issued in, and have limited languages.

The undersigned agencies respectfully submit these comments as of June 12, 2024.

- Adams County 911 Authority
- Arapahoe County 911 Authority
- Arapahoe County Office of Emergency Management
- Boulder County Communications; Boulder County Sheriff's Office
- Boulder Office of Disaster Management; City and County of Boulder
- Boulder Police and Fire Communications; City of Boulder
- Jefferson County Emergency Communications Authority (covering Jefferson and Broomfield Counties)
- Larimer Emergency Telephone Authority (covering Larimer and Jackson Counties)

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