

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

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

**Comments of the  
Alliance for Telecommunications Industry Solutions (ATIS)**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the Federal Communications Commission's (Commission) *Notice of Proposed Rulemaking (NPRM)* in the above-referenced dockets. In the *NPRM*, the Commission proposes to revise its Emergency Alert System (EAS) rules to add a new event code for missing and endangered persons (MEP). In these comments, ATIS provides input regarding the impact of the proposed new code to the Wireless Emergency Alert (WEA) system.

**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 developers, consumer electronics companies, emergency management and 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.

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

## II. COMMENTS

In the *NPRM*, the Commission proposes to revise its EAS rules to add a new "MEP" event code for EAS alerts about missing and endangered person incidents that do not meet the criteria for an AMBER Alert and asks how the new EAS code could affect WEA.<sup>1</sup> ATIS WTSC notes that the impact to WEA will depend on whether the Commission decides to map the MEP code onto an existing WEA alert class, such as the AMBER alert class, or to create a separate alert message classification (or "alert class") specifically for this code.<sup>2</sup> While ATIS WTSC is not in a position to weigh in on which of these choices would best serve the intent of this potential new event code, it has compared the technical impact on WEA and the difference in implementation time (i.e., time to field).

### A. Mapping of MEP Code onto Existing WEA Alert Class

ATIS WTSC does not believe there are any technical impacts to Commercial Mobile Service Provider (CMSP) networks or mobile devices if the EAS MEP event code is mapped to

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<sup>1</sup> *NPRM* at ¶30.

<sup>2</sup> As noted in the *NPRM*, WEA does not use event codes in the same manner as EAS. Instead, alert origination software and FEMA IPAWS map EAS event codes onto WEA handling codes that correspond to the WEA alert message classifications: National Alert, Imminent Threat Alert, AMBER Alert, and Public Safety Message. *NPRM* at ¶30.

any existing WEA alert class. This mapping will occur prior to the arrival of the alert message at the CMSP network, and no modification will be needed at the device to reflect a user choice for opting in/out because all existing alert classes are already represented in the device WEA menus. This option is available today from a WEA perspective.

### **B. Establishment of a New WEA Alert Class**

ATIS WTSC notes that end-to-end modifications of the alerting stakeholder communications chain would be needed if a new WEA alert class is established for the proposed MEP code, including:

- Changes to the Common Alerting Protocol (CAP) to show the selection of the alert class by the Alert Originator;
- Updates to the C-Interface between the Federal Emergency Management Agency (FEMA) and the CMSP network to add a new Special Handling code value;
- Changes to all other network interfaces, as well as to the broadcast interface, the chipset layer of the mobile device, and the application layer in the mobile device, to recognize and process the new WEA alert class; and
- Modifications to ATIS standards, including the C-Interface<sup>3</sup> and Mobile Device Behavior<sup>4</sup> specifications, as well as to 3GPP specifications.

In addition to these modifications, the WEA user settings on the mobile device would have to be updated to allow the user to opt in/out of the new alert class. Consumer education regarding these changes would also be beneficial.

ATIS WTSC believes that these changes would significantly increase testing time, as the signaling would have to be tested in each individual link, followed by integration and end-to-end testing. The impacts to WEA signaling associated with support for a new alert class would be similar to those identified by ATIS WTSC in its evaluation of proposed enhancement proposed

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<sup>3</sup> Wireless Emergency Alert (WEA) 3.0 Federal Alert Gateway to CMSP Gateway Interface Specification (ATIS-0700037.v003).

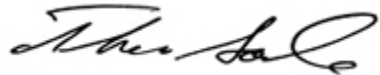
<sup>4</sup> Wireless Emergency Alert (WEA) 3.0 Mobile Device Behavior (MDB) (ATIS-0700036).

by the Communications Security, Reliability and Interoperability.<sup>5</sup> If a decision is made to create a new WEA alert class for MEP, ATIS WTSC estimates that it would take 36-54 months to complete the necessary end-to-end modifications.

### III. CONCLUSION

ATIS WTSC appreciates the opportunity to respond to the comments to the *Public Notice* and urges the Commission to consider the input above.

Respectfully submitted,



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May 20, 2024

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<sup>5</sup> ATIS Letter to Marlene Dortch, Commission Secretary, on February 5, 2024, in PS Docket Nos. 15-91 and 15-94.