

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

In the Matter of)
)
Information Collection Being Reviewed by the)
Federal Communications Commission) 84 Fed. Reg. 43128

COMMENTS OF CTIA

CTIA¹ respectfully submits these comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) Paperwork Reduction Act Notice (“PRA Notice”) regarding an information collection to evaluate the accuracy of Wireless Emergency Alert (“WEA”) geo-targeting capabilities.² CTIA and its member companies support continued efforts to enhance the WEA system, including the recently adopted enhanced geo-targeting rules (“WEA 3.0 enhancements”).³ After reviewing the Commission’s template preliminary and live test surveys,⁴ CTIA and its member companies urge the Commission to adopt minor

¹ CTIA® (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry, and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984, and is based in Washington, DC.

² See Notice of Information Collection Being Reviewed by the Federal Communications Commission, 84 Fed. Reg. 43128 (Aug. 20, 2019) (“PRA Notice”). The PRA Notice seeks information concerning: whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; the accuracy of the Commission’s burden estimate; ways to enhance the quality, utility, and clarity of the information collected; ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology; and ways to further reduce the information collection burden on small business concerns with fewer than 25 employees. *Id.*

³ See Federal Communications Commission, Wireless Emergency Alerts; Emergency Alert System, 83 FR 8619, 8623 (Feb. 28, 2018) (announcing a Nov. 30, 2019 amendment to 47 CFR 10.450).

⁴ See Live Test Survey – Overall, FCC.gov, <https://www.fcc.gov/files/livetestsurvey0719pdf> (last visited Oct. 21, 2019) (“Live Test Survey”); Preliminary Test Survey – Overall, FCC.gov,

modifications highlighted below that can help enhance the quality, utility, and clarity of the information collected. CTIA also encourages the Commission to share the results of the preliminary and live test surveys with Participating Commercial Mobile Service Providers (“CMSP”) to evaluate the effectiveness of this new capability and to continue enhancing its accuracy, where technically feasible.

I. DISCUSSION

CTIA supports the Commission’s intent to use the preliminary and live test surveys to collect information and evaluate the performance of enhanced geo-targeting during planned WEA tests. The PRA Notice highlights several steps that will be taken to collect information on WEA performance.⁵ Survey respondents affiliated with two alert originators, partnered with the Commission in different geographic areas of the country, will be asked to complete a preliminary survey.⁶ This survey is intended to improve the utility of a “live test” survey, which respondents will subsequently receive via a hyperlink embedded in a WEA test alert.⁷ While CTIA and its member companies support the efforts of the Commission to ensure the effectiveness of the WEA system, several elements of the template surveys should be updated to ensure clear, instructive results. CTIA’s recommended changes are as follows:

A. Make and Model.

Survey respondents should be required to provide their device make and model. Current versions of the preliminary and live test surveys request that respondents address device make

⁵ <https://www.fcc.gov/files/preliminariesurvey0719pdf> (last visited Oct. 21, 2019) (“Preliminary Test Survey”).

⁶ See PRA Notice

⁶ *Id.*

⁷ *Id.*

and model, but allow the field to be left blank. As written, the question reads: “What is the make and model of your mobile device (e.g., “Samsung Galaxy S10,” “Apple iPhone X.”) If you do not know, leave this field blank.”⁸

CTIA notes that information regarding device make and model is critical to assessing the performance of enhanced geo-targeting. Providing respondents with the option to leave the make and model field blank presents a critical deficiency for evaluating any root causes of potential issues identified through the WEA test messages. As the Commission is aware, the ability of wireless devices to support enhanced geo-targeting will vary between different handset makes and models and not all devices will support the capability.⁹ While some consumers may need new enhanced geo-targeting capable devices with the new WEA 3.0 capable chipsets, other consumers may be able to upgrade their current devices to support WEA 3.0 features. Therefore, it is critical that respondents provide their device make and model when reporting the effectiveness of WEA geo-targeting enhancements.

B. Operating System.

The Commission should modify the preliminary and live test surveys to request not only the respondent’s operating system, but also their device’s current software version. As written, current versions of the surveys ask respondents to indicate whether their device’s operating system is Apple iOS, Android, or Other/Not Sure.¹⁰ While operating system information is helpful to determining the effectiveness of WEA messages, the ability of wireless devices to

⁸ Preliminary Test Survey at 1; Live Test Survey at 1.

⁹ See Wireless Emergency Alerts; Amendments to Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket No. 15-94, *Second Report and Order and Second Order on Reconsideration*, ¶ 9 (2018) (noting that in certain circumstances a Participating CMS Provider may be technically incapable of matching the target area, including when legacy networks or devices cannot be updated to support this functionality).

¹⁰ Preliminary Test Survey at 4; Live Test Survey at 4.

support enhanced geo-targeting may vary between different software versions on the same operating system. As noted above, some consumers may be able to upgrade their current devices to support WEA 3.0 features. As such, the Commission should require that respondents provide the software version in addition to the device operating system.

C. Location Information.

Device location information should also be a required survey element. At this time, the preliminary test survey asks respondents to indicate their location at the time of the test: “Where will you be located at the time and day of the test (If you know, otherwise leave these fields blank)?”¹¹ Accordingly, the live test survey then inquires about respondent’s actual location at the time of the test: “Where were you when you received the alert . . . If you did not receive the alert, leave this field blank.”¹² Like device make and model, location information is an essential element of evaluating the performance of WEA geo-targeting enhancements. This is especially true of the device’s location during the WEA test as Participating CMSPs are required to deliver certain WEAs to 100 percent of the target area with no more than 0.1 of a mile overshoot. Therefore, location information is critical to determining the scope and accuracy of any test message. Without location information, the Commission will not be able to determine the effectiveness of enhanced geo-targeting.

D. Cellular Service.

Lastly, CTIA recommends that the Commission modify the preliminary and live test surveys to reflect the importance of provider specific service. Currently, the Commission asks respondents to indicate 1) if their device will have cellular service where they are located at the

¹¹ Preliminary Test Survey at 2.

¹² Live Test Survey at 2.

time and day of the test¹³; and 2) whether they had cellular service when the alert was sent.¹⁴

These questions should be modified to inquire into not only *whether* the device had cellular service at that location, but whether it had service *with respondent's provider* at that location. Notably, WEAs are delivered to WEA-capable devices connected to capable mobile wireless networks, including in instances where the device is operating on another provider's network. Accordingly, provider specific information helps wireless providers accurately gauge the efficiency of *their* network's enhanced geo-targeting capabilities.

CTIA also notes that following its inquiry into cellular service, the Commission's live test survey asks respondent to provide information on what type of service their mobile device had during the test. Respondents are provided with several answer options, including 2G, 3G, 4G, and Other/Not Sure.¹⁵ CTIA and its member companies do not believe this inquiry is relevant to determining the performance of providers' geo-targeting capabilities. All WEAs are sent to WEA-capable devices over cell-broadcast technology, which avoids traffic issues that may impact non-emergency text message services, like SMS. As a result, because WEAs are delivered over cell-broadcast technology, the "type of service" has no bearing on the quality, utility, and clarity of information collected. CTIA suggests that the Commission not include such a question in its surveys.

II. CONCLUSION

CTIA supports the efforts of the Commission to ensure that WEA is effective at protecting the life and property of the public. Accordingly, the Commission should modify the

¹³ Preliminary Test Survey at 2.

¹⁴ Live Test Survey at 3.

¹⁵ Live Test Survey at 5.

preliminary and live test surveys to ensure the quality, utility, and clarity of the information collected. CTIA and its member companies look forward to reviewing the results of the preliminary and live test surveys to evaluate the effectiveness of the new geo-targeting capabilities and to continue enhancing the accuracy of the WEA system.

Respectfully submitted,

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