

Via Electronic Filing

July 12, 2024

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: *Implementation of Multilingual Wireless Emergency Alerts*, PS Docket Nos. 15-91 and 15-94

Dear Ms. Dortch:

Consumer Technology Association (“CTA”)¹ writes on behalf of its members in response to the initial comments on the Federal Communications Commission (“FCC” or “Commission”) Public Notice on *Implementation of Multilingual Wireless Emergency Alerts* (“WEA Multilingual Notice”). The WEA Multilingual Notice seeks comment on the use of templates to support multilingual alerting in the WEA system.² CTA’s comments focus on incorporating event-specific information into fillable alert templates³ and considerations for American Sign Language (“ASL”).⁴ While CTA recognizes the value of enhancing WEA accessibility by implementing multilingual emergency alerts, the Commission should consider potential technical hurdles.

CTA Recognizes the Importance of Wireless Emergency Alerts

On October 4, 2023, the Federal Emergency Management Agency (FEMA) and FCC conducted a nationwide test of the Emergency Alert System (EAS) and WEA. The goal of this test was to ensure that the system continues to be a successful means of communicating emergency information to the public. According to the FCC [Report: October 4, 2023 Nationwide Emergency Alert Test](#), to reach all mobile devices the WEA portion of the test was sent as a National Alert, which subscribers cannot opt out of receiving, and the test message was sent to all consumer cellphones in the United States and its territories.⁵

¹ CTA is North America’s largest technology trade association. Our members are the world’s leading innovators—from startups to global brands—helping support more than 18 million American jobs. CTA owns and produces CES® —the most powerful tech event in the world.

² *Public Safety and Homeland Security Bureau Seeks Comment on Implementation of Multilingual Wireless Emergency Alerts*, Public Notice, PS Docket Nos. 15-91, 15-94 (rel. Feb. 15, 2024) (“Public Notice”).

³ Public Notice at paras. 16-19.

⁴ Public Notice at paras. 20-24.

⁵ *Report: October 4, 2023 Nationwide Emergency Alert Test*, PS Docket Nos. 15-91, 15-94, 22-329, (rel. June 27, 2024) at 4.

In the days immediately following this test, [CTA Market Research](#) conducted a [survey](#) to understand the method for how U.S. adults received/heard the Emergency Alert on October 4, 2023. Nine in ten (95%) or 245 million U.S. adults received/heard the October 4 emergency alert via their phone. Specifically, 92% of U.S. Adults (237 million) indicated they received the alert through their smartphone.⁶ The results of this survey illustrate the ubiquity of cellphones and smartphones and the importance of the WEA system.

As the FCC pursues implementation of multilingual alert templates, CTA requests the Commission consider the technical hurdles discussed below.

- **Incorporating Event-Specific Information into Fillable Alert Templates**

As the FCC considers the feasibility of incorporating fillable elements into WEA messages⁷, it is important to note that, as ATIS stated in the record, “the four proposed elements are not currently delivered to the mobile device.”⁸ CTA also shares CTIA’s concerns about the feasibility of development and implementation of fillable fields, which “would require significant additional standards development and end-to-end testing to ensure the resulting alerts do not confuse or endanger consumers.”⁹ As a standards development organization¹⁰, CTA understands that the type of study and testing necessary to develop fillable alert templates that work takes significant time, resources, and stakeholder engagement. These technical considerations should be examined further by the FCC before implementation.

- **Considerations for ASL**

CTA agrees with the FCC that “due to the nature of ASL video templates, it may not be possible for fillable elements to be directly inserted into ASL templates like they can for text-based alerts”¹¹ It is possible to pre-record a text crawl for event-specific information combined with a pre-recorded ASL template for standardized information as long as the concerns discussed above about the implementation of fillable fields are addressed. CTA looks forward to input from the ASL community in the record to determine whether (a) a combination of ASL and text crawl or (b) text crawl only would best deliver the alert information in a timely and accurate manner.

CTA commends the FCC for recognizing that most Americans receive emergency and public safety information through WEA to mobile devices, not terrestrial radio. CTA supports enhancing WEA accessibility by implementing multilingual emergency alerts if the technical challenges discussed above are addressed.

Respectfully submitted,

⁶ CTA U.S. Adult Emergency Alert Survey 2023 <https://cdn.cta.tech/cta/media/media/pdfs/cta-u-s-adult-emergency-alert-survey-2023.pdf>

⁷ Public Notice at para. 17.

⁸ ATIS Comments at 7.

⁹ CTIA comments at 15.

¹⁰ <https://www.cta.tech/Resources/Standards>

¹¹ Public Notice at para. 24.

/s/ J. David Grossman

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