Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	**)**	
	)	
	)	PS Docket No. 25-224
Modernization of the	**)**	
Nation's Alerting Systems	**)**	

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

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Modernization of the Nation's Alerting Systems	))	PS Docket No. 25-224

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The Alliance for Telecommunications Industry Solutions (ATIS) hereby replies to the comments submitted in response to Federal Communications Commission's (Commission) August 8, 2025, *Notice of Proposed Rulemaking* (*NPRM*) in the above-referenced docket.

I.   Summary

ATIS is pleased to see support for many of the issues that ATIS' Wireless Technologies and Systems Committee (WTSC) raised in its comments, including that incremental improvements to WEA, rather than a system redesign, provide the most cost-effective and practical approach. There is also broad stakeholder acknowledgement that training for Alerting Authorities (AAs) and public education are critical to ensure the effective use of alerts, prevent misuse, and foster public trust. ATIS WTSC recommends that AA training include guidance on the proper use of WEA, including a clear definition of Imminent Threat.

In these replies, ATIS also:

- Notes commenter support for participation in WEA by all levels of the U.S. government;
- Reiterates its concerns about excessive end-user customization and the need to carefully evaluate any changes that could undermine WEA's public safety objectives;
- Recommends that additional study be undertaken before WEA could be extended to streaming or other platforms;
- Recommends additional research into machine translation to improve multilingual alerts;

- Addresses the use of satellites to enhance coverage;
- Notes the importance of multilingual alerting; and
- Explains that ATIS has provided guidance regarding the collection of data for alert dissemination in an annex to ATIS' *WEA 3.0 Practical Hints for Alert Originators*.

II.   Reply Comments

A. Commenters Support Objectives of Alerting Systems and Evolution of WEA

ATIS WTSC is pleased to see broad support among commenters for the three (3) stated objectives of alerting systems: rapid notification of emergencies, delivery of protective instructions, and authoritative communication before, during, and after emergencies.[1] NOAA/National Weather Service (NWS), for example, agrees with these objectives and emphasizes the importance of ensuring alerts are understandable and accessible to all users.[2] ATIS WTSC also is encouraged by the broad agreement among commenters regarding the importance of ensuring that alerting systems meet the goals of protecting life and property, providing timely and actionable information, and fostering public trust.[3] ATIS WTSC agrees with these commenters that the proposed goals are appropriate, that alerts should be understandable and broadly accessible and that alerting systems should protect life and property, provide timely, actionable information, and foster public trust.

Many commenters also agree with ATIS that WEA has evolved to meet the objectives, including improvements in character limits, multilingual support, and geo-targeting accuracy.[4]

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[1] *NPRM* at 7. *See*, *e.g.,* Harris County Office of Homeland Security & Emergency Management Comments at p. 1; OR-Alert Governance Committee and the Office of the Statewide Interoperability Coordinator for the State of Oregon (OR-Alert) Comments at p. 1; North Carolina Emergency Management, North Carolina State Emergency Communications Committee, Capitol Broadcasting Company, PBS North Carolina, Device Solutions Inc, Triveni Digital Inc, and Digital Alert Systems Comments at p. 8; New York State Division of Homeland Security and Emergency Services Comments (DHSES) at p. 1.

[2] NWS Comments at p. 1 (https://www.fcc.gov/ecfs/document/109251499825486/1).

[3] *See e.g.*, Snohomish County Department of Emergency Management (SCDEM) Comments at p. 1; National Federation of the Blind Comments at p. 2; Commonwealth of Virgina Department of Transportation at p. 1; NWS Comments at p. 1.

[4] ATIS Comments at pp. 2-3.

As CTIA – The Wireless Association® (CTIA) notes in its comments, "WEA's design also offers a proven capability to keep pace with evolving needs of alerting stakeholders. Participating CMSPs and equipment manufacturers have worked diligently to enhance the WEA system since its adoption."[5] The Competitive Carriers Association (CCA) explains that "EAS and WEA have met [or] exceeded expectations since their inceptions, meeting a critical need and becoming widely used, with uses and capabilities burgeoning since their inception."[6]

B. Incremental Upgrades to WEA Should Be Considered, Not a Fundamental Redesign

ATIS WTSC is encouraged by the agreement among stakeholders, including NWS, that gradual, incremental upgrades to alerting systems are more cost-effective and practical than complete system redesigns.[7] As CTIA explains, "[t]he success of the WEA system demonstrates that revolutionary changes premised on redesign of the one-way broadcast system should be avoided. No alternative system is ready for deployment, and alternative designs for WEA that have been considered have not been able to replicate the benefits of the current approach, including its high reliability, low latency, international compatibility, and coverage."[8] Moreover, as the CCA explains, "[f]orbearing from taking additional action to impose new requirements is consistent with this Administration's Executive Orders and recent court precedent."[9] This same point was made by ATIS in its comments.[10]

ATIS WTSC strongly disagrees with those commenters that have suggested fundamental redesigns to WEA and/or EAS may be required to better meet the needs of specific

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[5] CTIA Comments at p. 6.
[6] CCA Comments at p. 1.
[7] NWS Comments at p. 2; Accessibility Organizations Comments at p. 2; ATSC Comments at p. 1. CTIA Comments at p. 15,
[8] CTIA Comments at p. 10.
[9] CCA Comments at p.10.
[10] ATIS Comments at p. 4.

populations.[11] ATIS WTSC strongly believes that a fundamental redesign would undermine the effectiveness of the current system by sacrificing the optimized features that make WEA fast and reliable today. As Xperti Inc. explains, "[a]ny consideration of overhauling or updating the framework for the WEA/EAS frameworks should first recognize the critical role that broadcast plays in ensuring the timely, reliable delivery of emergency alerts, particularly when other delivery formats fail."[12]

ATIS WTSC urges the Commission not to undertake a redesign of WEA or EAS. Instead, ATIS WTSC recommends a technology-neutral and flexible regulatory approach that focuses on targeted improvements, such as enhancing accessibility features and leveraging advanced technologies like machine translation for multilingual alerts. While ATIS WTSC supports the goal of making alerts more accessible, it believes that these objectives can be achieved through incremental enhancement, thus avoiding the loss of the low-latency and high reliability design in operation today.

ATIS WTSC also strongly recommends that a strategic, long-term vision be developed to avoid inefficiencies and duplication. A balanced approach that combines incremental improvements with comprehensive planning will ensure cost-effectiveness and technological compliance, as well as limiting consumer impacts.

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[11] *See e.g.*, NFB Comments at p. 2; King County Comments at p. 3; OR-Alerts Comments at p. 3; John Merrell Comments at p. 6.
[12] Xperi Inc. Comments at p. 8.

C. All Levels of U.S. Government Should Be Able to Send Alerts

ATIS WTSC agrees with NWS and other commenters that all levels of government –

federal, state, Tribal, territorial, and local – should have the ability to send emergency alerts.[13]

This ensures comprehensive coverage and localized messaging tailored to specific community

needs. ATIS WTSC also supports NWS's recommendation for clear guidelines to avoid alert

duplication and fatigue, as well as the need for additional training resources for AAs.[14] Harris

County Office of Homeland Security & Emergency Management (Harris County) explains that

"many of the shortcomings of WEA seem to stem from the public being inundated with

messages that are not relevant to them" and urges the Commission to implement a mandatory,

comprehensive training for AAs.[15] ATIS WTSC believes that robust safeguards, standardized

protocols, and training are essential to maintaining the integrity and reliability of the alerting

system.

Commenters such as VDOT echo ATIS WTSC's view that empowering federal, state,

Tribal, territorial, and local governments to send alerts ensures comprehensive coverage and

timely dissemination of critical information.[16] There is also agreement on the need for safeguards

to prevent alert fatigue and ensure the integrity of the alerting system.[17] ATIS WTSC appreciates

the alignment on the importance of empowering all levels of government while implementing

safeguards to minimize duplication and confusion. ATIS WTSC reiterates its recommendation

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[13] *See* NWS Comments at p.1, King County Comments at p.2; Washington Emergency Management Division (WA EMD) Comments at pp. 2-3; REC Networks (REC) Comments at p. 3.
[14] NWS Comments at p. 1.
[15] Harris County Comments at p. 5.
[16] VDOT Comments at p. 1.
[17] AWARN Alliance Comments at p. 3; Colorado AAs Comments at p. 3; Consumer Technology Association (CTA) Comments at p. 9; Harris Country Comments at p. 4; NCTA Comments at p. 7; OR-Alert Governance Committee Comments at p. 2; Sinclair Comments at p.1; Snohomish County Comments at p. 3-4.

for centralized coordination, standardized protocols, and enhanced training for AAs to improve geotargeting and message quality.[18]

D. AA Training Is Essential

ATIS WTSC strongly supports the consensus among commenters, including the AAs and Accessibility Organizations, on the need for comprehensive training for AAs.[19] Proper training will improve the quality and clarity of alerts, reduce public frustration and alert fatigue, and enhance trust in the system. As the AWARN Alliance explains in its comments, "[t]he current system works efficiently and speedily to notify the public in life-threatening situations when the system is used properly by officials authorized to activate EAS and WEA notifications."[20] Art Botterell similarly notes that "WEA's effectiveness for non-federal agencies has proven considerable, but it has suffered from a lack of consistent policy and training at the level of local agencies and the individual officials most likely to need to warn the public."[21]

Many commenters, including NWS and CTIA, agree with ATIS WTSC on the importance of equipping AAs with proper training and education, which are essential to improving the quality and consistency of alerts.[22] ATIS agrees with USGS that "originators should be educated and given data and tools to optimize their alerting strategies to increase the quality and reduce the volume of alerts."[23] There is widespread recognition that technical capabilities alone are insufficient without proper training on how to use them effectively.[24] Comprehensive training

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[18] ATIS Comments at p. 23.
[19] Accessibility Organizations Comments at p. 3; NYCEM Comments at p. 7; AWARN Alliance Comments at p. 2; Art Botterell Comments at p. 3; WA EMD Comments at p. 3.
[20] AWARN Alliance Comments at p. 2.
[21] Art Botterell Comments at p. 3.
[22] *See e.g.,* NWS Comments at p. 2; CTIA Comments at p. 20; USGS Comments at p. 4.
[23] USGS Comments at p. 4.
[24] *See* Harris County Comments at p. 5-6; NOAA Comments at p. 1; NYCEM Comments at p. 7; REC Networks Comments at p. 3.

programs, best practices, and ongoing support are critical to improving the quality, consistency, and public trust in emergency alerts. ATIS remains committed to supporting initiatives that improve training programs and operational best practices for AAs.

ATIS WTSC encourages the Commission to continue to leverage FEMA's resources, such as the IPAWS training programs, and to promote the adoption of best practices outlined in ATIS' *WEA 3.0 Practical Hints for Alert Originators*.[25]

E. WEA Must Be Used Appropriately

AA training should incorporate clear guidance from the Commission on the proper use of WEA, including a clear definition of Imminent Threat.[26] As King County Emergency Management (King County) states in its comments, WEA is being used "to alert people of traffic accidents… a misuse of what is supposed to be a life-safety alerting system …[that] undoubtedly contributes to alert fatigue."[27] The Adams County E-911 Emergency Telephone Service Authority, Arapahoe County 911 Authority, Arapahoe County Office of Emergency Management, Boulder County Sheriff's Office, Boulder Office of Disaster Management, Colorado Council of Authorities, Inc., Jefferson County Emergency Communications Authority, and Larimer Emergency Telephone Authority (collectively, the "Colorado AAs") add that, "[i]f the Commission intends to broaden the allowable scope of emergency alerts beyond *imminent threats to life*, it must first establish clear and enforceable definitions for such use. Without precise definitions, the risk of over-alerting grows significantly, leading to alert fatigue, device

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[25] ATIS Standard on *WEA 3.0 Practical Hints for Alert Originators* (ATIS-0700049), approved August 18, 2021 (Revised March 7, 2024). This document is available at no charge from
https://access.atis.org/higherlogic/ws/public/document?document_id=75628.
[26] [26] Colorado AAs Comments at p. 11 (noting the need for clear and enforceable definitions).
[27] King County Comments at p.2.

opt-outs, and diminished public trust."[28] ATIS WTSC agrees that preventing misuse of WEA can mitigate alert fatigue and consumer annoyance.[29]

As required, OS providers have designed WEA setting menus that present the choice to opt-in/out of the non-mandatory alert classes. Two of these are Imminent Threat (sometimes shown as Emergency Alerts) and the Public Safety Message alert classes. Unlike AMBER alerts, these two alert classes do not have strict definitions of usage. While the term "imminent threat" is generally understood to be an event requiring immediate action to protect life and property, the Imminent Threat class is being used for events that do not pose "imminent threats" to the persons receiving the alert presentation (Blue Alert, MEP, and other events that are not life-threatening). If the user is allowed to opt-in/out of these different levels of alerts, AAs should choose an appropriate alert class for each alert based on those expectations. While ATIS supports public education regarding WEA, education will not be effective if the AAs' actions are not aligned with it.

During the last year, the OS Providers have proactively modified their handling of Imminent Threat to ensure alert presentation to those in immediate danger by modifying the handling of this alert class to circumvent Do Not Disturb (DND) settings. When AAs use the Imminent Threat alert class for events that do not pose a direct threat to the persons receiving the alert, this can result in consumer frustration as the consumers' choice to activate DND would be improperly overridden for information that did not need to be communicated immediately. The reaction from consumers may be severe, as demonstrated by the October 4, 2024, 4:52am Texas Blue Alert.

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[28] Colorado AAs Comments at p. 11 (italics in original).
[29] *See* ATIS Comments at p. 21.

F. Public Trust, Stakeholder Collaboration, and Public Education Are Essential

While ATIS WTSC strongly believes that the objectives of the WEA system have been met,[30] it agrees with commenters and the Commission that increased training for alert originators, education for the public, and collaboration among all alerting stakeholders are essential to meeting the goals of the nation's alerting systems."[31] Commenters broadly agree with ATIS WTSC that fostering public trust and encouraging compliance with protective actions are critical to the success of alerting systems.[32]

The public also must be educated on as many aspects of WEA as possible so that consumers understand what to expect from WEA. Public education campaigns and transparency about how alerts are generated and targeted are widely supported.[33] Public education campaigns should build trust and promote adherence to protective guidance. ATIS WTSC recommends that the Commission collaborate with stakeholders to develop standardized messaging and outreach materials to enhance public understanding of WEA and to manage expectations.

While AA training is needed to ensure optimal choices are employed as to whether to send an alert and which settings/values to choose as the input, collaboration also is needed among stakeholders to ensure understanding across the different parts of the alerting system as well as knowledge, dissemination, and analysis of any concerns prior to having any modifications being pursued. ATIS WTSC appreciates the shared emphasis on collaboration among stakeholders, including federal, state, and local governments, broadcasters, wireless

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[30] ATIS Comments at p.2.
[31] U.S. Geological Survey (USGS) Comments at p.13.
[32] *See e.g.,* NYCEM Comments at p. 3; Oregon Department of Emergency Management Comments at p. 2; WA EMD Comments at p. 1; AAJC Comments at p. 3.
[33] Accessibility Organizations Comments at p. 3; Snohomish County Comments at p. 6; Digital Alert Systems Comments at p. 77.

providers, and public safety agencies.[34] As noted by multiple commenters, such collaboration among stakeholders, including the Commission, FEMA, broadcasters, wireless providers, and public safety agencies is essential to align goals, share best practices, and address operational challenges.[35] FEMA's Integrated Public Alert and Warning System (IPAWS) Working Group is an excellent example of ongoing industry/government collaboration with the goal of improving the nation's alerting systems. ATIS WTSC stands ready to contribute to these collaborative efforts and share best practices to enhance the effectiveness and reliability of alerting systems.

G. Excessive End-User Customization of Alerts Should Be Avoided

Some commenters, including consumer advocacy groups, have advocated for greater end-user customization of alert settings, such as personalized alert preferences and adjustable tones.[36] NFB, for example, raised concerns about the accessibility of alerts for blind and deaf/blind individuals and suggested greater focus on end-user device capabilities.[37] ATIS WTSC cautions against any customization that could compromise the effectiveness of emergency alerts. While user experience is important, public safety must remain the top priority, and these features are essential to ensuring that alerts reach the intended audience and prompt appropriate action during emergencies. The view that customization could lead to unintended consequences, such as users disabling critical alerts or failing to receive life-saving information, is shared by a number of commenters.[38]

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[34] New York City Emergency Management Comments at p. 3; American Council of the Blind Comments at p. 4,
[35] Accessibility Organizations Comments at p. 6; California Governor's Office of Emergency Services Comments at p. 1; New York City Emergency Management Comments at p. 3.
[36] Comments of Accessibility Organizations at p. 3; Comments of the National Federation for the Blind at p. 2; WA EMD Comments at p. 13-14.
[37] NFB Comments at p. 1.
[38] See SCDEM Comments at p. 2, Accessibility Organizations at p. 3, CTIA Comments at p. 8.

The primary goal of WEA is to protect public safety, and any changes that could undermine this objective must be carefully evaluated. ATIS WTSC recommends a balanced approach that preserves system effectiveness while addressing accessibility needs.

H. Additional Study is Needed Before Extending WEA to Streaming or Other Platforms

Some commenters recommend leveraging streaming and other platforms for alert dissemination.[39] ATIS WTSC agrees that expanding alerting capabilities to include internet-connected devices may be valuable but notes that this approach introduces technical and operational complexities.[40] Studies may be needed to determine the potential effects of adding additional alert dissemination methods on consumer frustration at receiving the same information on multiple platforms simultaneously. ATIS WTSC recommends a light-touch regulatory approach to encourage innovation while ensuring compatibility with existing systems.

I. Machine Translation for Multilingual Alerts Should Be Studied

In its comments, USGS expresses concerns about the feasibility and reliability of real-time machine translation for emergency alerts.[41] ATIS WTSC acknowledges that there are challenges associated with real-time machine translation but believes that ongoing research and development in this area will overcome these challenges. ATIS WTSC encourages the Commission to support pilot programs and partnerships to evaluate the effectiveness of AI-assisted machine translation in real-world scenarios.

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[39] *See e.g.*, NWS Comments at pp.1-2, King County Comments at p. 3, WA EMD Comments at p. 1.
[40] Several comments note the challenges associated with the use of streaming services to transmit WEA. The National Association of Broadcaster (NAB) notes in its comments "pure-play online content streamers are not well-positioned to participate in the existing EAS system because their large coverage areas and infinite coverage of cloud-based services make it effectively impossible to monitor for EAS alerts based on geography or type of alert. The limitless reach of streaming services also makes it impractical to geo-target the transmission of alerts." NAB Comments at p 17 (footnotes omitted). *See also* WTA – Advocates for Rural Broadband Comments at p. 3; CTA Comments at p. 6.
[41] USGS Comments at p. 8.

J. Use of Satellites to Extend WEA Coverage

Some commenters have expressed concerns about geographic areas where there is no cellular coverage. [42] ATIS WTSC notes that satellite dissemination of WEAs is emerging and promises greater coverage, including coverage to many previously unreachable areas.[43] ATIS WTSC is engaged in a study to address WEA via satellite and interactions with terrestrial-based WEA. As WTSC has stated previously, the wider the variety of systems used to disseminate the alerts, the better the chances of having the largest number of consumers receive the alert in some manner.[44]

K. Multilingual Alerting is Important

ATIS WTSC supports the Commission's focus on delivering alerts in languages understood by diverse communities[45] and is encouraged by the support for this concept by other commenters that emphasize the need for tailored messaging to meet the needs of affected populations.[46] ATIS WTSC reiterates its recommendation that the Commission explore advanced machine translation technologies to enable real-time multilingual alerting, ensuring timely and accurate information for non-English-speaking populations.[47] ATIS WTSC notes that the ability of AAs to use URLs in the alert text already supports multilingual alerts.

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[42] *See e.g.,* CTIA Comments at p. 22, County of Sonoma Department of Emergency Management Comments at p. 2, OR-Alert Comments at p. 3, WA EMD Comments at p. 5, Washington Emergency Management Division Comments at p. 12, Harris County Comments at p. 1; Colorado AAs Comments at p. 7.
[43] Some providers, such as T-Mobile, have already deployed WEA via satellites, which has increased WEA coverage. Other service providers are also examining similar deployments.
[44] ATIS Comments at p. 11.
[45] *NPRM* at ¶12.
[46] *See* Accessibility Organizations Comments at p. 5; DHSES Comments at p. 3.
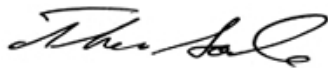[47] ATIS Comments at pp 18-19.

L. ATIS Has Provided Guidance Regarding the Collection of Data for Alert Dissemination

ATIS WTSC is pleased to report that it recently created an annex to *WEA 3.0 Practical Hints for Alert Originators* that details the purpose, benefits, and execution of a State/Local WEA Test alert.[48] This annex offers a list of WEA data metrics that can be used to analyze the performance of different stakeholders, as well as to evaluate reliability and WEA 3.0 testing. This data, obtained through coordinating volunteers and/or through staged devices, offers complete data for performance analysis.

III.   Conclusion

ATIS appreciates the opportunity to respond to comments to the *NPRM* and urges the Commission to consider the input above.

Respectfully submitted,

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[48] Annex B to *WEA 3.0 Practical Hints for Alert Originators*.