

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

In the Matter of	)	
	)	
Modernization of the Nation's Alerting Systems	)	PS Docket No. 25-224
	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91
	)	
Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System	)	PS Docket No. 15-94
	)	

**Comments of the
Alliance for Telecommunications Industry Solutions**

**Alliance for Telecommunications
Industry Solutions**

Thomas Goode ATIS General
Counsel
1200 G Street, N.W. Suite 500
Washington, DC 20005
(202) 628-6380

TABLE OF CONTENTS

SUMMARY	i
I. BACKGROUND	2
II. COMMENTS	2
A. Preserving Flexibility and Promoting Standards-Based Evolution	2
B. Universal Alert Identifier	3
C. WEA Rebroadcasting and Message Persistence	5
D. Geotargeting Enhancements and Elimination of Exceptions	6
E. Accessibility Enhancements and User Experience Features	10
F. Retirement of 90-Character WEA Messages	10
G. Implementation and Compliance Timing	11
III. CONCLUSION	13

SUMMARY

ATIS supports the Federal Communication Commission's (FCC or Commission) objective of modernizing the nation's alerting systems and improving Wireless Emergency Alerts (WEA) but recommends that the Commission avoid overly prescriptive mandates where flexible technical solutions would better promote interoperability, resiliency, consumer trust, and long-term public safety effectiveness. In these comments, ATIS

- Explains that the proposed WEA and EAS enhancements affect a broad technical ecosystem and should be implemented through coordinated standards development and industry collaboration;
- Argues that many proposed alerting enhancements require multi-stakeholder technical coordination and should be pursued through flexible standards-based processes;
- Supports reducing duplicate alerts through a Universal ID but recommends a FEMA/IPAWS-assigned identifier rather than changes that would burden alert originators or conflict with existing WEA features;
- Opposes a fixed one-minute rebroadcast mandate and recommends flexibility to account for network conditions, alert types, and timing tolerances;
- Recognizes the public safety benefits associated with improving WEA targeting accuracy and reducing overshoot, but cautions that elimination of all existing geotargeting exceptions requires careful evaluation of technical, operational, privacy, and implementation challenges;
- Supports accessibility improvements such as standardized symbols but recommends coordinated development, testing, user education, and consultation with affected communities before mandates;
- Supports retiring outdated 90-character WEA requirements if the transition is based on market readiness and does not reduce access to WEA services; and
- Urges the Commission to allow at least 48 months for implementation.

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

In the Matter of	)	
	)	
Modernization of the Nation’s Alerting Systems	)	PS Docket No. 25-224
	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91
	)	
Amendment of Part 11 of the Commission’s Rules Regarding the Emergency Alert System	)	PS Docket No. 15-94

**Comments of the
Alliance for Telecommunications Industry Solutions**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby submits these comments in response to the *Further Notice of Proposed Rulemaking (FNPRM)* in the above-referenced dockets. In the *FNPRM*, the Federal Communications Commission (Commission) proposes changes to its rules to make Wireless Emergency Alerts (WEA) “more helpful to alerting authorities, less unnecessarily burdensome for participating communications providers, and better able to save lives.”¹ ATIS appreciates the Commission's continued efforts to modernize the Nation’s alerting systems and strengthen the effectiveness of WEA and shares the Commission’s objective of ensuring that emergency alerts are reliable, accurate, accessible, and capable of reaching affected individuals in a timely manner. The issues raised in the *FNPRM* – including duplicate alert suppression, alert retransmission, geotargeting improvements, accessibility enhancements, and message lifecycle management – represent important opportunities to further improve WEA. Instead of overly prescriptive implementation mandates,

¹ *Further Notice of Proposed Rulemaking (FNPRM)* in PS Docket Nos. 25-224, 15-91, and 15-94 (released June 29, 2026) at ¶2.

the Commission should continue to leverage the expertise of standards development organizations and industry stakeholders to develop the technical mechanisms necessary to achieve these objectives in a manner that promotes interoperability, innovation, operational resiliency, and long-term public safety effectiveness.

I. BACKGROUND

ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information and communications technologies (ICT). ATIS' diverse membership includes key ICT stakeholders—wireless, wireline, and VoIP service providers, equipment manufacturers, broadband providers, software developers, consumer electronics companies, 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. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees.

ATIS' WTSC develops wireless radio access, system, and network solutions related to wireless and/or mobile services and systems. WTSC develops and continues to enhance solutions necessary to support a U.S. public warning system and WEA system. ATIS is the 3GPP North American partner, and WTSC provides critical technical review and input for necessary contributions.

II. COMMENTS

A. Preserving Flexibility and Promoting Standards-Based Evolution

As explained in more detail below, many of the proposals under consideration in this proceeding implicate multiple elements of a complex and interconnected alerting ecosystem that

extend well beyond Participating Commercial Mobile Service Providers (CMSPs). Successful implementation would require coordinated evolution among FEMA/IPAWS, alert origination platforms, ATIS standards, 3GPP specifications, network equipment suppliers, mobile device manufacturers, operating system providers, and Participating CMSPs. Many of the proposed enhancements – including a Universal Alert Message Identifier,² enhanced geotargeting mechanisms,³ location-services-based alert filtering,⁴ accessibility features such as symbols,⁵ and revised alert retransmission procedures⁶ – would require standards development, software and firmware development, interoperability testing, and deployment across multiple technology platforms.

B. Universal Alert Identifier

ATIS WTSC supports the Commission’s objective of reducing duplicate alerts and improving consumer confidence in WEA through a Universal ID but agrees with the Commission that the CAP identifier is not the best option for supporting the goal.⁷ ATIS WTSC would also not recommend defining a new CAP parameter for this purpose due to the impacts to CAP messaging and the development that would be required for all Alert Originators.

ATIS WTSC notes that it may be possible for FEMA IPAWS to assign a unique ID that is passed to the Participating CMSPs and then broadcast to devices in a modified WEA message for use in duplication detection. While this would require IPAWS, CMSP infrastructure, and mobile device standards and implementation, such a FEMA-assigned unique ID should not require software changes in Alert Originator-based software at the originating end.⁸

² *FNPRM* at ¶51.

³ *FNPRM* at ¶61.

⁴ *FNPRM* at ¶63.

⁵ *FNPRM* at ¶78.

⁶ *FNPRM* at ¶56.

⁷ *FNPRM* at ¶52.

⁸ There are currently identifiers in the Common Alerting Protocol such as CAP ID, but it is quite lengthy and its use

The Commission also seeks comment on whether using a FEMA-IPAWS generated unique identification number would help enable lifesaving developments in the alerting ecosystem such as National Weather Service’s (NWS) “Threats-in-Motion” alerting that could allow NWS to continually update the target area and message content without generating duplicate alerts.⁹ ATIS WTSC notes that CSRIC VIII reviewed Threats in Motion in its Report on WEA Application Programming Interface.¹⁰ This report identified a number of potential impacts on WEA stakeholders, including the need for “[d]esign, standardization (ATIS and 3GPP), and implementation of protocol signaling impacts in the network and broadcast signaling to recognize and process new information element(s) or message type(s),” as well as the need to “[m]odify [the] current Update process to handle Threats in Motion, including retaining the Message ID/Serial Number combination from the original alert to correlate to the Update message.”¹¹ ATIS WTSC further notes that implementation of this functionality would raise significant design challenges because the correlation of updated alerts with previously received alerts would conflict with the behavior of the already-deployed Device Based Geofencing (DBGF) feature.

During CSRIC VIII discussions regarding Threats in Motion, participants noted that advances in sensing, forecasting, and monitoring technologies could enable emergency information to be updated much more frequently than is practical for consumer alerting systems. As alerting capabilities evolve, it is important that duplicate suppression and alert correlation mechanisms do not inadvertently encourage excessive alert updates. Even where updates are presented in a minimized manner, frequent notifications containing little new actionable

as a WEA unique identifier would impact broadcast capacity.

⁹ *FNPRM* at ¶54.

¹⁰ CSRIC Working Group 6: WEA Application Programming Interface.

¹¹ *Id.* at Section 5.1.3.3.2.1.

information may contribute to alert fatigue and reduce public responsiveness to future alerts. In addition, widespread processing of large numbers of updates may create unnecessary operational burdens across the alerting ecosystem that could impact system performance for users with critical communication needs. Accordingly, ATIS WTSC recommends that Alert Originators exercise discretion when issuing updates and limit such updates to circumstances in which meaningful new information must be communicated to the public.

C. WEA Rebroadcasting and Message Persistence

WEA Rebroadcasting. The *FNPRM* seeks comment on whether Participating CMSPs should be required to rebroadcast WEA messages at least once every sixty seconds throughout an alert's active period.¹² ATIS supports the goal of improving alert delivery to individuals entering an alert area after the initial broadcast and enhancing resiliency against temporary connectivity disruptions. However, the Commission should not prescribe a fixed nationwide one-minute rebroadcast interval for every alert type and every network implementation. A mandatory rebroadcast interval would reduce providers' ability to engineer their network resources and could create unnecessary control channel loading during periods of multiple simultaneous alerts.

A mandatory rebroadcast interval would also make WEA less effective by eliminating providers' flexibility to use different rebroadcast approaches for different alert classes.

Consistent with 3GPP specifications, CMSPs should be able to tailor rebroadcast intervals to specific alerts as appropriate. For example, a 60-second interval may be appropriate for Imminent Threat alerts but not for all classes of alerts.

WEA Retransmission. The Commission seeks comment on whether Participating CMSPs should cease retransmission of WEA messages with a 24-hour active period five minutes before

¹² *FNPRM* at ¶56.

the end of that period.¹³ ATIS WTSC notes that timing alignment between Alert Originators, FEMA IPAWS, and Participating CMSP networks has been studied previously, and that differences among timing sources can result in operational variations in how alert validity periods are calculated and processed. In addition, standards discussions have contemplated allowing broadcast transmissions to continue beyond a paging cycle when necessary to complete delivery of all alert segments and provide devices a reasonable opportunity to receive the complete alert message. As a result, under certain circumstances, an alert with a 24-hour validity period could remain in transmission long enough to result in an additional broadcast occurrence near or shortly after the expiration boundary, even when operating as intended. For this reason, ATIS WTSC believes Participating CMSPs should have the flexibility to discontinue transmission sufficiently in advance of the expiration time to account for timing tolerances, transmission completion procedures, and implementation-specific operational considerations. This flexibility would help minimize unintended post-expiration rebroadcasts while preserving reliable alert delivery.

D. Geotargeting Enhancements and Elimination of Exceptions

0.1 Mile Overshoot Exemption. The Commission proposes to eliminate the existing exceptions to the Commission's WEA geotargeting requirements that allow more than 0.1 of a mile of overshoot in some circumstances.¹⁴ The *FNPRM* specifically contemplates mandatory location-service activation for devices that currently have location services disabled,¹⁵ stricter requirements for legacy implementations,¹⁶ and equivalent performance requirements for FIPS-based alerting and polygon-based targeting.¹⁷ ATIS recognizes the public safety benefits

¹³ *FNPRM* at ¶58.

¹⁴ *FNPRM* at ¶61.

¹⁵ *FNPRM* at ¶61, ¶63.

¹⁶ *FNPRM* at ¶62.

¹⁷ *FNPRM* at ¶67.

associated with improving WEA targeting accuracy and reducing overshoot. At the same time, elimination of all existing geotargeting exceptions raises technical, operational, privacy, and implementation challenges in addition to user device impacts, which require careful evaluation.

Disabled Location Services Exemption. The Commission further proposes to eliminate the geotargeting accuracy exception for devices with location services disabled and seeks comment on whether it should require mobile devices to force location services on when a WEA is received to reduce WEA overshoot.¹⁸ ATIS WTSC notes that forcing location services to “on” and overriding the choices of consumers would raise significant privacy concerns and increase the risk of opt-out if those choices are not respected (e.g., forcing on location could reveal details for individuals like domestic abuse survivors or those seeking confidential mental health services). With respect to location-service activation, ATIS WTSC reiterates that WEA is fundamentally different from user-initiated services such as 9-1-1, where consumers knowingly engage location capabilities to receive assistance. Any proposal to activate location services in support of WEA should therefore be evaluated carefully against consumer expectations regarding privacy, control over device functionality, and battery utilization.

There would also be battery impacts associated with forcing on location services. Turning location on every time an alert broadcast is received triggers location acquisition, possibly over the course of hours if the user is in the broadcast area but not inside the alert area. Unlike turning on location services for 9-1-1, forcing location services on for WEA would not be a one- or two-time battery hit but a potentially significant drain of the battery.¹⁹ If a consumer’s battery is low, forcing location services on could fully expedite the draining of the battery, possibly eliminating the consumer’s ability to reach out for assistance (e.g., by placing a call to 9-1-1) or to reach

¹⁸ FNPRM at ¶63.

¹⁹ FNPRM at ¶64.

family members.²⁰

ATIS suggests that a better solution, consistent with alerting research, is to have the area affected along with recommended actions fully described in the alert text to allow the consumer to determine their proximity and react accordingly.

Legacy Network Exemption. ATIS WTSC supports the Commission’s proposals to eliminate the geotargeting exception for legacy networks and devices, as many Participating CMSPs either have already retired or are actively retiring their 2G and 3G networks.²¹ Eliminating the exemption would better align the Commission’s rules with the capabilities of modern wireless networks and devices and promote more consistent application of geotargeting requirements across the WEA ecosystem.

FIPS Code Accuracy. The *FNPRM* proposes to require WEA messages that geotarget alerts by using FIPS codes to achieve the same level of geotargeting accuracy as alerts sent using a polygon or circle to define the alert area.²² The Commission notes that the U.S. Census Bureau database mapping county codes to polygon coordinates “may enable IPAWS or participating wireless providers to translate a geocode into a polygon before it reaches a mobile device so that the mobile device can use those coordinates for the purpose of geofencing using available polygon smoothing techniques.”²³ As an initial matter, ATIS WTSC recognizes that it is not the Participating CMSP’s responsibility to identify the target alert area and thus should not undertake this conversion of FIPS codes to coordinates. The Alert Originators or FEMA IPAWS should do this.

²⁰ It also should be noted that location acquisition can simply fail at the time the alert is received due to coverage issues. In this case, the default action is still to present the alert for safety.

²¹ *FNPRM* at ¶62.

²² *FNPRM* at ¶67.

²³ *FNPRM* at ¶68.

ATIS WTSC notes that what the Commission is proposing by using the U.S. Census Bureau database would cause the coordinates to exceed the 100-coordinate limit for the polygon of the message as specified in ATIS-0700037.²⁴ Every additional 100 coordinates added to the broadcast payload would add a minimum of three additional broadcast segments to the alert message. Increasing the number of polygon coordinates could significantly impact latency and reliability, placing consumers in danger. Alerts involving multiple counties or entire states (e.g., AMBER alerts) would further exacerbate these risks.

Converting all FIPS-based WEAs to polygons raises concerns regarding simultaneous location acquisitions by large numbers of devices. WEA 3.0 Practical Hints for Alert Originators (ATIS-0700049) discourages statewide outlines for DBGF due to the number of devices that would trigger location acquisition simultaneously.²⁵ This same concern regarding the number of simultaneous acquisitions would apply to highly populated counties as well (e.g., Los Angeles County). The triggering of tens of millions of location acquisition processes could significantly impact cellular system performance.

To minimize alert fatigue and consumer opt-out, a better solution would be for Alert Originators to describe the affected area in detail in the alert text, along with enhanced public education. If the Commission nonetheless moves forward with its proposal, ATIS WTSC urges that any FIPS to coordinate conversion be performed at the sending end by the Alert Originators and be limited/smoothed to the 100-coordinate maximum while outlining the alert area as closely as possible.

²⁴ ATIS-0700037 (Dec. 2017), available at <https://www.atis.org/docstore/product.aspx?id=28367>.

²⁵ WEA 3.0 Practical Hints for Alert Originators (ATIS 0700049), Section 6.7.

E. Accessibility Enhancements and User Experience Features

The Commission seeks comment on whether to require EAS and WEA messages to display standardized symbology that identifies the threat type.²⁶ ATIS WTSC supports continued efforts to improve accessibility and public comprehension of alerts. The proposed use of standardized symbols offers potential public safety benefits but requires substantial coordination and alignment across multiple ecosystem participants. Implementation will depend heavily on mobile device manufacturers, operating system implementation, and field testing before mandatory deployment requirements should be considered. When considering symbology, ATIS WTSC urges the Commission to focus on identifying a common set of symbols that can be used by all Alert Originators across all alert dissemination methods, with an initial focus on symbols related to protective actions (“take cover”) rather than descriptive (“tornado”). Defining a common set of symbols will avoid potential confusion in the meaning of such symbols. Additionally, the Commission should consider the importance of a coinciding educational component to any use of symbology to ensure effectiveness. To the extent accessibility use cases benefit from symbology, the Commission should consult with the appropriate communities about what symbols would be the most understandable and effective to convey messages.

F Retirement of 90-Character WEA Messages

The Commission proposed in the *FNPRM* to retire its requirement that Participating CMSPs support transmission of a 90-character-maximum Alert Message on, and only on, those elements of its network incapable of supporting a 360-character Alert Message.²⁷ ATIS WTSC supports the Commission’s objective of removing legacy obligations whose continued utility has diminished over time. Eliminating the requirement to support both 90-character and 360-

²⁶ *FNPRM* at ¶78.

²⁷ *FNPRM* at ¶118.

character messages will reduce complexity across alert origination systems and CMSP implementations but should be based on demonstrable market readiness and deployment data to ensure that no populations lose access to WEA services during the transition.

G. Implementation and Compliance Timing

The Commission proposes that: (1) the rules to retire 90-character WEA messages become effective 30 days after publication of the rule in the *Federal Register*;²⁸ (2) the rules to ensure consistent retransmission of WEA messages, implement EAS location codes as adopted by the Bureau on delegated authority, and authenticate all CAP EAS messages become effective twelve months after publication of the rules in the *Federal Register*;²⁹ (3) the rules allowing the use of EAS software become effective either twelve months after publication of the rules in the *Federal Register* or 30 days after the Bureau publishes a notice in the *Federal Register* that Paperwork Reduction Act (PRA) review is complete, whichever is later;³⁰ and (4) the rules to strengthen WEA geotargeting, prevent duplicate alerts by requiring use of a Universal ID, and promote a common symbology for alerts become effective thirty-six months after publication of the rules in the *Federal Register*.³¹

ATIS WTSC notes that the enhancements contemplated in the *FNPRM* extend well beyond wireless carrier networks and implicate a broad ecosystem of stakeholders, including FEMA IPAWS infrastructure, alert origination platforms, standards development organizations, network equipment vendors, operating system providers, device manufacturers, and end-user devices. Many of the proposed changes will require corresponding updates to ATIS standards, 3GPP specifications, software and firmware implementations, operating system release cycles,

²⁸ *FNPRM* at ¶138.

²⁹ *FNPRM* at ¶139.

³⁰ *FNPRM* at ¶139.

³¹ *FNPRM* at ¶140.

device development and replacement cycles, and extensive multi-stakeholder interoperability and field testing.

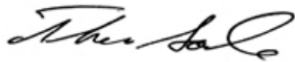
Accordingly, ATIS WTSC urges the Commission to adopt a minimum implementation period of 48 months, measured from publication of the final rules, that reflect the complexity and interdependence of this ecosystem and provide sufficient time for standards development, product implementation, testing, deployment, and operational validation. This timeline better aligns with industry standards-development processes, 3GPP release cycles, device development schedules, and large-scale deployment and validation activities necessary to ensure reliable alert delivery.

III. CONCLUSION

ATIS supports the Commission's goals of improving alert reliability, reducing duplicate alerts, enhancing geotargeting precision, expanding accessibility, and eliminating outdated requirements. However, ATIS encourages the Commission to preserve the longstanding flexibility and technical neutrality that has enabled the WEA ecosystem to evolve successfully and that the Commission recently affirmed remains an important part of the existing regulatory framework.

The Commission should establish performance and public-safety objectives while relying on standards organizations and industry collaboration to develop the technical mechanisms needed to achieve these objectives. Such an approach will maximize interoperability, encourage innovation, accommodate future technologies, and ensure continued reliability of the nation's wireless emergency alerting system.

Respectfully submitted,



Thomas Goode
General Counsel
Alliance for Telecommunications Industry Solutions
1200 G Street, NW
Suite 500
Washington, DC 20005
(202) 628-6380

August 31, 2026