

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials, International (APCO),¹ submits these comments regarding the Notice of Proposed Rulemaking in the above captioned proceeding.² The Commission proposes to add a new “MEP” event code for all Emergency Alert System (EAS) alerts regarding missing and endangered person incidents that do not meet the criteria for an AMBER Alert.³ APCO supports this proposal.

Emergency alerts save lives. As APCO has explained in other Commission proceedings, improving consistency in alerts makes them a more effective public safety tool.⁴ Today, missing and endangered person incidents that do not meet the criteria for an AMBER Alert⁵ are transmitted under a variety of event codes – most commonly, Civil Emergency Messages (CEM), Local Area Emergency (LAE), or Law Enforcement Warning (LEW). Establishing the MEP event code will facilitate consistency, which will simplify the development of standard

¹ Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 40,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Emergency Communications Centers (ECCs), emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

² Wireless Emergency Alerts, Amendments to Part 11 of the Commission’s Rules Regarding the Emergency Alert System, PS Docket Nos. 15-91, 15-94, *Notice of Proposed Rulemaking*, FCC 24-30 (Mar. 15, 2024) (“NPRM”).

³ NPRM at para. 13.

⁴ *See, e.g.*, Comments of APCO International, PS Docket Nos. 15-91, 15-94 (filed July 21, 2023) (describing support for a variety of proposals targeted at improving transparency and consistency for Wireless Emergency Alerts).

⁵ AMBER alert codes may only be used to issue alerts regarding missing or endangered persons under the age of 18. 47 CFR § 10.400(c)(1)(ii).

operating procedures, support collaboration between jurisdictions, and facilitate the rapid and coordinated delivery of alert notifications about missing and endangered persons to the public in a uniform manner.

The Commission asks whether it should revise its Wireless Emergency Alert (WEA) rules to create a separate alert message classification for missing and endangered person alerts and whether alert origination software and FEMA IPAWS should map the MEP code onto the AMBER Alert message classification, the Public Safety Message Classification, or a new alert message classification specifically for missing and endangered person alerts.⁶ As the Commission notes, Public Safety Messages are only eligible for issuance in connection with another alert message classification, and not all missing and endangered person alerts will meet the criteria for Imminent Threat Alerts or AMBER Alerts.⁷ Ensuring that WEA alerts can be differentiated by severity, urgency, and relevance is important for reducing the likelihood that recipients ignore or opt out of certain alert classifications. The benefits of differentiation suggest that a new WEA classification would be helpful. However, these benefits must be balanced against the risk of introducing additional complexity for the system and the public. APCO looks forward to reviewing comments that address these issues.

APCO appreciates the Commission's work to enhance emergency alerts and looks forward to supporting further efforts.

Respectfully submitted,

APCO INTERNATIONAL

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⁶ NPRM at para. 30.

⁷ *Id.* at para. 30 n.72 (citing 47 CFR § 10.400(b-d)).

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May 20, 2024