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November 13, 2024

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

Re: Notice of *Ex Parte*, Docket Nos. PS 15-91, 15-94

On November 12, the undersigned met virtually with representatives of the Commission's Public Safety and Homeland Security Bureau to discuss the proposed multilingual templates for Wireless Emergency Alerts (WEAs) in the above captioned proceeding. At the Bureau's request, APCO discussed the utility of a multilingual template for WEAs regarding 9-1-1 outages and suggested edits to the proposed template language, as summarized below.

When 9-1-1 outages occur, emergency communications centers (ECCs) may take steps to mitigate the impact of the outage and alert the public by posting on social media and providing alternative means to reach 9-1-1. The WEA system provides an additional tool for ECCs to utilize during a 9-1-1 outage to provide critical information to the public. While a WEA template for 9-1-1 outages may not suit all outage scenarios, for instance if the outage is limited in scope and does not impact all of 9-1-1 service, it may simplify the process for ECCs to send alerts regarding total 9-1-1 outages and enable easier translation of the WEA message, thus expanding the reach of the WEA to non-English speakers.

The Bureau proposed two types of WEA templates for 9-1-1 outages, a static version and a fillable version that can be amended to include certain outage-specific information.¹ APCO expressed a preference for WEA templates for 9-1-1 outages that can be customized to include critical information such as the location of the outage, an alternative method to reach 9-1-1, and an embedded URL.

¹ Public Safety and Homeland Security Bureau Seeks Comment on Implementation of Multilingual Wireless Emergency Alerts, PS Docket Nos. 15-91, 15-94, *Public Notice*, DA 24-137 (rel. Feb. 15, 2024).

APCO's recommended changes to the Bureau's proposed fillable template language are exemplified in the redline below:

[SENDING AGENCY]: 911 OUTAGE ALERT in [LOCATION] ~~until [TIME].~~ In case of emergency. ~~Please contact police, fire, medical, or other emergency services directly at their local phone number:s [PHONE NUMBER] in case of emergency.~~ If you dial 911, you may not get help. [URL]

APCO recommended removing the language "until [TIME]" as ECCs are rarely informed of how long a 9-1-1 outage will last and may not be able to provide an end time to the public. In addition, APCO recommended tailoring the WEA message to enable the inclusion of a phone number to enable ECCs to add alternative contact information, such as the ECC's 10-digit administrative line, into the WEA. This will reduce confusion when directing the public on how to reach emergency services.

In addition to the proposed template language changes, APCO further recommended that the Bureau consider implementing a WEA multilingual template for "all clear" alerts to notify the public that an emergency, such as a 9-1-1 outage, has been resolved and the alert is no longer in affect.

APCO appreciates the Bureau's attention to the issue and looks forward to further collaboration.

Respectfully Submitted,

APCO INTERNATIONAL

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