



May 29, 2018

**Chairman Ajit Pai**  
**Commissioner Brendan Carr**  
**Commissioner Mignon Clyburn**  
**Commissioner Michael O’Rielly**  
**Commissioner Jessica Rosenworcel**  
**Federal Communications Commission**  
445 12th Street SW  
Washington DC 20554

**Mr. Chairman and Commissioners:**

The Emergency Managers of our nation’s most populous jurisdictions (Big City Emergency Managers (BCEM)) along with the National Emergency Management Association (NEMA) and the International Association of Emergency Mangers (IAEM), sincerely appreciate the on-going efforts of the Federal Communications Commission (“FCC” or “the Commission”) to improve the Wireless Emergency Alert (WEA) system. While the recently adopted rules are surely moving the system in the correct direction, the system continues to lack a number of critical capabilities; chief among them is the inability to include multimedia in alerts. Multimedia enhancements are a critical update that must be approved in order to support our mission to save lives and property.

Similar to longer text messages, hyper-accurate geolocation, and the ability to share hyperlinks, multimedia is already something our phones and network can accommodate. The capability to share live news broadcasts and press conferences, to watching world events unfold in real time through tens of millions of photos, videos, and other graphics – this already occurs on a daily basis. Society is familiar with these features and expects them during emergencies. These powerful capabilities need to be integrated into the nation’s WEA system.

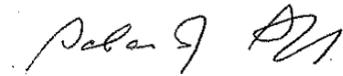
Having an image can mean the difference between action and non-action. An example of this is the New York City Chelsea Bombings in 2016. New York City needed the assistance of their residents and visitors to locate a dangerous terrorist and issued a WEA message. Because of the system’s limitations they were unable to include an image, only a reference for recipients to seek out the suspects image via traditional media outlets. Less than half did. More recently was the use of WEA during the 2017 Hurricane Season. Showing expected inundation areas and maps during large flooding events such as Hurricane Harvey could have shown where hazards were more easily than trying to describe a location in a text-based message. Images can show the protective actions rather than trying to explain them.

As the old adage goes, a picture is worth a thousand words. This could not be more relevant than supporting the emergency information needs of individuals with access and functional needs, including

those with limited English proficiency. For individuals who are deaf or hard of hearing, American Sign Language (ASL) is often used, but is a unique language that requires visual cues; English is truly their second language. For individuals who are blind or visually impaired large print or instructions given in an image (which can be zoomed in by the recipient) can be easier to understand. During an emergency, emergency managers are responsible for alerting their whole community and those members of our communities with disabilities, access, and functional needs deserve equal access to the information.

The nation's WEA system remains astonishingly behind universally adopted consumer technology. Including this multimedia in the WEA messages has been discussed since CSRIC IV in 2013 and is an expected feature that should be adopted by the FCC immediately. The time to act is now.

Sincerely,



Barb Graff  
Chair, Big City Emergency Managers (BCEM)  
Director, City of Seattle Office of Emergency Management  
<https://www.bigcityem.org/>



Ron Prater  
Executive Director, Big City Emergency Managers



Mike Sprayberry  
President, National Emergency Management Association (NEMA)  
Director, North Carolina Division of Emergency Management  
<https://www.nemaweb.org/>



Nick Crossley  
President, U.S. Council of the International Association of Emergency Managers (IAEM)  
<https://www.iaem.com/>