



January 28, 2020

The Honorable Víctor L. Parés-Otero  
Presidente, La Comisión de Desarrollo Económico, Planificación, Telecomunicaciones, Alianzas Público Privadas y Energía  
Cámara de Representantes  
El Capitolio, Apartado 9022228,  
San Juan, PR 00902-2228

Dear Representative Parés-Otero:

On behalf of CTIA, the trade association of the wireless communications industry, and its member companies, including AT&T, Sprint, and T-Mobile, I write in opposition to PC 2364, which would amend the Puerto Rico Telecommunications Act of 1996 to require telecommunications earthquake text alerts. Specifically, this legislation would require wireless providers operating in Puerto Rico to create a separate text alert system and notify their users of the occurrence of earthquakes of a 5.0 magnitude or more. Since 2012, the wireless industry has supported emergency alerts through the Wireless Emergency Alert (WEA) system, which transmits emergency warnings and information from local public safety officials directly to consumers with WEA-capable mobile devices. While we support your interest in ensuring Puerto Rico consumers have timely warnings of earthquakes, CTIA urges public safety officials in Puerto Rico to work with the United States Geological Survey (USGS) to avoid duplicating existing efforts to implement early earthquake warnings (EEWs) and undermining the well-developed and the proven life-saving WEA system. CTIA and its members do not support the adoption of PC 2364.

### **Wireless Emergency Alerts**

The WEA system is premised on a successful, voluntary public-private partnership among local, state, and federal alert originators, the Federal Emergency Management Agency (FEMA), and participating wireless providers. Since the system's first launch in 2012, over 49,000 WEAs have been sent to warn and inform millions of wireless consumers about imminent threats (such as earthquakes, wildfires, and hurricanes), abducted children (AMBER alerts), and various other emergencies. As a result of recent wireless industry and FEMA efforts to further enhance the WEA system, WEA notifications may be up to 360-characters and provide public safety information to consumers in English or Spanish. Notably, WEAs are not short messaging service (SMS) texts. Rather, the WEA system uses a purpose-built cell-broadcast technology to deliver alert messages within a geographic area specified by the alert originator, which is seen as a preferable technology solution for the delivery of emergency communications to large populations in a short period of time.

To distribute WEAs, alert originators must apply to FEMA to become alert-originating authorities. In an emergency, alert-originating authorities send an alert message and a specific geographic area to FEMA through its Integrated Public Alert and Warning System (IPAWS). FEMA then authenticates the sending



alert originator before transmitting the WEA to participating wireless providers who may have subscribers with WEA-capable devices in the designated alerting area.

Since its implementation, the WEA system has helped save lives across Puerto Rico. The Puerto Rico Emergency Management Agency is the WEA alerting authority on the island and has the capability to send alerts and warnings directly to WEA-capable mobile devices. For example, numerous flash flood warnings were issued in Puerto Rico by way of the WEA system in August 2019. System tests were conducted in 2019 as well.

### **Proposed Legislation**

The WEA system can notify wireless consumers in Puerto Rico of earthquake activity and related imminent threats as deemed necessary by any authorized alert originators. Creating another wireless alert system, as proposed by PC 2364, is unnecessary, would lead to operational challenges for public safety officials in Puerto Rico, and potentially cause consumer confusion. Furthermore, SMS text message technology may not necessarily effectively support the technical features that have made WEA a proven life-saving technology.

In addition, the California ShakeAlert EEW system referenced by PC 2364 is operated by the USGS. USGS is the alert originator for ShakeAlert EEWs in California, Oregon, and Washington and has substantially studied and worked on developing programs that support early detection and analysis capabilities. CTIA urges Puerto Rico policymakers and public safety officials to coordinate directly with USGS on future earthquake early warning capabilities within WEA, rather than requiring the implementation of a separate earthquake early warning system.

CTIA and its member companies look forward to continuing to support public safety's efforts to ensure alert originators across Puerto Rico can harness the proven life-saving capabilities of WEA. CTIA and its members respectfully urge you not to pass this bill.

Sincerely,

Gerard Keegan  
Vice President, State Legislative Affairs