



VIA EMAIL

October 21, 2019

Nicole Ongele
Office of the Managing Director
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington D.C. 20554

**Re: Information Collection Being Reviewed by the Federal Communications Commission:
Enhanced Geo-Targeted Wireless Emergency Alerts [WT Docket No. 10-254: DA 12-1745]**

Dear Nicole Ongele:

The Rehabilitation Engineering Research Center for Wireless Inclusive Technologies (Wireless RERC)¹ mission is *to integrate established wireless technologies with emerging wirelessly connected devices and services for a transformative future where individuals with disabilities achieve independence, improved quality of life, and enhanced community participation.* Our consumer research team conducts surveys, focus groups, and prototype development and testing to collect qualitative and quantitative data on a variety of use and usability content areas, including mobile user interfaces, device features, apps, emergency alerting, access to 911, and social media for emergency management. The Wireless RERC's *Policy Outreach and Initiatives* project employs research data in the federal rulemaking process with evidence-based filings to inform the development of wireless technology policies and regulations that are inclusive of the needs of people with disabilities.

In response to the above-referenced *Notice and Request for Comments*, the Wireless RERC is supportive of the FCC's initiative to collect data on the geo-targeting capabilities of WEA messages using an embedded link to the survey within the message. This proposed data collection method will improve the ecological validity of the survey results, as the survey will be taken in an uncontrived setting. It also addresses a common risk to accuracy when using self-report measures, reliance on respondents' memory. Because the respondents can take the survey immediately following the receipt of the test message, the accuracy of responses is heightened.

¹ The Rehabilitation Engineering Research Center for Wireless Inclusive Technologies (Wireless RERC) is sponsored by the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR grant number 90RE5025-01). NIDILRR is within the Administration for Community Living (ACL), Department of Health and Human Services (HHS). The contents of this filing do not necessarily represent the policy of NIDILRR, ACL, HHS, and you should not assume endorsement by the Federal Government.

The proposed survey's purpose is to evaluate the accuracy of geotargeted WEA messages, and that is a critical measure of the effectiveness of WEA messages. In 2015, we conducted a national online survey (*2015 WEA Survey*) to gain a greater understanding of how people with disabilities and those with access and functional needs respond to WEA messages. The 2015 WEA survey collected data on WEA awareness, accessibility, trust and validation of message content, frequency of receipt of WEA messages, actions taken upon receipt, and future features for the next-generation of WEA. Regarding the accuracy of the geotargeted messages, results indicated that 48% of all respondents agreed and strongly agreed that they did *not* take action because the emergency was not near them.² This finding indicates that the better the accuracy of the geotargeting, the more likely people are to take the recommended protective action.

Beyond the accuracy of geotargeting, measures of the efficacy of WEA messages include the level of awareness of WEA, the extent to which WEA-enabled devices are diffused amongst the population, the accessibility of the message to people with disabilities, and recipients having a favorable behavioral response to the messages. Favorable being defined as taking the appropriate protective actions. As such, we recommend that the FCC, at a later date, consider collecting data on factors impacting WEA efficacy for people with disabilities. We offer our subject matter expertise regarding (a) what constitutes inclusive emergency alerting specifically and (b) research design, in general. To that end, we would welcome a collaborative effort to ensure the design of a survey tool to capture information that addresses the aforementioned factors.

As stated in the FCC Report on the 2018 Nationwide WEA and EAS Test, next steps include "Explor[ing] mechanisms to improve feedback solicitation and collection for both the public and in ETRS regarding accessibility issues for non-English speakers and people with disabilities."³ We hereby invite the staff of the Public Safety and Homeland Security Bureau (PSHSB), the Consumer and Governmental Affairs Bureau, (CGAB) and other relevant FCC staffers to contact us regarding future surveying of the disability community using an embedded link in the WEA messages. As asserted above, it is an excellent method for distributing the survey and collecting precise responses. Should you have any questions concerning this letter, please do not hesitate to contact either Salimah LaForce (salimah@cacp.gatech.edu) or Helena Mitchell (helena@gatech.edu).

Respectfully submitted,



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Cc: Suzanne Singleton, Chief, Disability Rights Division, CGAB (via e-mail)
Lisa M. Fowlkes, Bureau Chief, Public Safety and Homeland Security Bureau (via email)
Marlene H. Dortch, Secretary, Office of the Secretary (via email)

² LaForce, S., Bennett, D., Linden, M., Touzet, C. & Mitchell, H., "Optimizing accessibility of wireless emergency alerts: 2015 survey findings," *Journal on Technology & Persons with Disabilities*, vol. 4, pp. 42-54, October 2016.

³ FCC. "Report: October 2, 2018 Nationwide WEA and EAS Test," April 2019. Retrieved from <https://www.fcc.gov/fcc-releases-report-2018-nationwide-emergency-alert-test>