

## **WIRELESS EMERGENCY ALERTS: WHY RADIO TUNERS ARE UNECESSARY**

February 2012

CTIA-The Wireless Association® strongly opposes any proposal to impose an FM chipset mandate on mobile devices. The wireless industry has been working with the FCC, FEMA, and other governmental stakeholders to develop a mobile broadcast emergency alerting system compatible with present and future wireless air interfaces that will allow for the targeted real-time delivery of government-approved alerts. **Importantly, even NAB has told Congress that they do not seek a mandate for FM chipsets in mobile devices.**

Following the requirements of the [WARN Act](#), the FCC established an Advisory Committee to recommend technical requirements for wireless carriers to voluntarily transmit [emergency alerts](#). Members of the Commercial Mobile Service Alert Advisory Committee included State, local, and tribal governments, broadcasters, public safety, members of the private sector, and representatives of people with disabilities. The Advisory Committee specifically considered the use of FM chips, as well as several other technologies, but did not recommend their use.

Forty-one of the 42 members of the Committee voted in favor of the recommendations. In April 2008, the FCC adopted most of the Advisory Committee recommendations, including those for wireless carriers to transmit certain types of alerts, specifically Presidential, imminent threat, AMBER alerts, and emergency alerts originated by State, local and other non-Federal entities.

Changing direction now and adopting a FM chip focused solution, which was fully considered and rejected during implementation of the WARN Act, will put this multi-year collaboration and investment at risk and delay the widespread availability of alerting capability. Wireless providers' nationwide roll-out of Wireless Emergency Alerts (also known as CMAS or PLAN) has already begun, well in advance of the April 2012 deadline.

A key differentiator of the Wireless Emergency Alerts capability versus existing subscription-based text messaging alert services currently available in some localities is that the Wireless Emergency Alerts will enable alert messages to be sent to any cell phone within range of a particular cellular communications towers. Wireless Emergency Alerts also utilize different communications channels and protocols in wireless systems that decrease the impact of network congestion on alert message delivery during times of emergency.

Here are several additional facts to consider:

- CTIA's opposition to an FM chipset mandate has long been echoed by groups like the Telecommunications Industry Association (TIA), the Consumer Electronics Association (CEA), the Information Technology Industry Council (ITI), Tech America, the Recording Industry Association of America (RIAA), and the Rural Cellular Association (RCA). Mandating that every wireless device include an FM chip would raise the cost of producing wireless devices, with the likely outcome being that consumers would pay more for functionality they may not desire or ever use.

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- As devices continue to evolve, chip and antenna space is at a premium. Requiring that devices carry an FM chip may foreclose opportunities to include other functionality that may be more highly valued by consumers and harm competition among device makers by limiting opportunities for differentiation.
- NAB is already well aware that there are dozens of mobile devices currently offered with enabled FM radio. Literally dozens of phones – including the latest and hottest-selling smartphones – are offered with enabled FM radio and that number continues to grow, as NAB itself acknowledges.

For further background, please read the following CTIA blog posting from Chris Guttman-McCabe, Vice President for Regulatory Affairs: <http://blog.ctia.org/2011/09/12/its-time-to-replace-fiction-with-facts/>