

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Modernization of the Nation’s Alerting Systems)	PS Docket No. 25-224
)	

Comments of WTA – Advocates for Rural Broadband

WTA – Advocates for Rural Broadband (“WTA”) submits these comments on some of the issues raised in the Commission’s Notice of Proposed Rulemaking with regard to modernizing the nation’s Emergency Alert System (“EAS”) and Wireless Emergency Alerts (“WEA”) systems.¹ WTA is a national trade association representing approximately 400 small, rural local telecommunications carriers. The typical WTA member company serves fewer than 5,000 customers per service area and has fewer than 50 employees. WTA’s members provide voice, broadband and other communications-related services to some of the most remote, rugged, sparsely populated, and expensive-to-serve areas of the United States, and have been at the forefront of providing advanced services to these very difficult to serve territories. WTA appreciates the critical role the national alerting systems currently play in saving lives and minimizing damage when disasters strike. However, WTA is concerned about how expanding the alerting systems to extend to streaming services could be implemented, the burdens that could be imposed on our members by provisions outlined in the *NPRM*, and the potential impact on the privacy of our members’ customers.

The *NPRM* recognizes that for many consumers, their sources of obtaining information

¹ *Modernization of the Nation’s Alerting Systems*, FCC 25-50, released August 8, 2025, 90 FR 41530 (August 26, 2025) (hereafter cited as “*NPRM*”).

have migrated from broadcasting (either over the air or via cable or satellite television and radio) to streaming services via various devices. The *NPRM* thus asks whether we need to create a new system to extend alerts to these consumer information sources, and how such a system might work.² While in theory it would be good policy to expand the alerting system to extend its reach, it is far from clear how that would work and still be practical. Moreover, to the extent that most consumers are already carrying a device with them that has geo-specific alerting capability (*i.e.*, their smart phone), such a new alerting system targeting users streaming video or other services might be unnecessarily redundant and repetitive.

As the *NPRM* makes clear, a critical part of any alerting system is the ability to provide geo-specific alerts.³ Cell phones have relatively precise location capability incorporated into the phone as a result of the Commission's requirement imposed in the context of E-911 calls.⁴ But many other devices used for streaming, such as laptops, smart-TVs and media streaming devices/sticks, do not incorporate such a capability. And relying on IP addresses may not provide a sufficient level of accuracy of the device's location, particularly with many customers using virtual private networks (VPNs) which allows that person's "real" IP address to be masked using a remote server. Nor is it clear that Wi-Fi positioning would provide necessary levels of location accuracy for geo-targeted alerts. Thus, it might require the Commission and/or Congress to impose an obligation on equipment manufacturers to incorporate specific location capabilities into their devices, although that would increase the costs and complexity of those devices.

² *NPRM* at ¶¶ 18-19.

³ *NPRM* at ¶ 14.

⁴ 47 C.F.R. § 9.1.

It is also unclear what role, if any, our members would play in transmitting the geo-targeted alerts to their customers. Assuming the location of the streaming device could be determined,⁵ it is not clear how an alert would be transmitted to devices that were actively operating (assuming that there was also not going to be a requirement imposed on equipment devices to mandate remote activation capabilities). Our members monitor at a high level the network traffic going to and from a household, but they do not (and do not want to) monitor the content of any of those transmissions, so they would not know if the homeowner was streaming programming, or whether some connected devices were automatically downloading an update to their operating software. And even if they knew the customer was actively streaming video, we do not know how our members would interrupt the video stream to provide the geo-targeted alert.⁶ Our members also have concerns regarding their potential liability in case the new alerting system fails to notify their customers or the customer does not see the alert.

On the other hand, having the alert come from the source of the streamed program would introduce enormous problems and complexities. A streaming site like Netflix might know the IP addresses to which it is sending programming, but that would not be sufficient to provide accurate information on the device's location, as explained above. And with the multitude of potential streaming sources, it is also far from clear how the Integrated Public Alert and Warning System (IPAWS) would alert all the potential streaming sources to check their active streams to determine which ones were being streamed into the geo-targeted area.

Finally, if there is going to be ongoing monitoring of their customers' locations in order

⁵ Given that for some of our members their service territory is hundreds of square miles, an alert sent to all of their customers would not be geo-targeted.

⁶ In the case of cable-tv systems, equipment in the head-end can disrupt the transmissions on every channel and substitute the emergency alert.

to be able to conduct geo-targeting of the alerts, WTA's members are worried about privacy concerns, particularly because the *NPRM* suggests that customers may not be able to opt out of such monitoring/alerting.⁷ The *NPRM* nowhere mentions privacy or any requirement to obtain the affirmative consent of the customer. In sum, WTA's members would need to know a lot more about how this expansion of the alerting system would work before we could assess the public interest benefits and drawbacks of this proposal. WTA thus urges the Commission to issue a Further Notice of Proposed Rulemaking fleshing out the details of this suggested expansion of the alerting systems.

Respectfully submitted,

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⁷ *NPRM* at ¶ 20.