



Ex Parte Filing

February 7, 2018

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: Hurricane Response [PS Docket # 17-344] – FM Radio and RBDS-Based Emergency Alerting

Dear Ms. Dortch:

The Rehabilitation Engineering Research Center for Wireless Inclusive Technologies (Wireless RERC) hereby submits Ex Parte documents regarding “additional information relevant to the 2017 hurricane season’s impact on communications generally.” Specifically, these comments offer approaches that encourage the use of FM Radio (specifically the FM chip) via mobile devices as an emergency information source. The mission of the Wireless RERC¹ 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. Emergency information access is essential to sustaining quality of life for all people, regardless of disability status. Nevertheless, people with disabilities experience emergency information access disparities that can have dire consequences.

We are submitting these Ex Parte comments as near-future considerations for remediating communications access issues. These comments were prepared in response to Chairman Ajit Pai’s recent statement calling for mobile device companies to make a shift and activate FM Radio chips in phones. The Wireless RERC initially addressed this topic in 2013, after several years of severe tornado season damage. We remain convinced that the FM chip capability holds great promise as a public safety application and agree with Chairman Pai’s assessment that “communications services during times of emergency is critical.”

Two documents are respectfully submitted, a short 2-page brief and a longer research brief elucidating the advantages/benefits of adoption of FM Radio chip activation for emergency response.

This submission elaborates on the following three points:

- The Integrated Public Alert and Warning System (IPAWS) was created to reach the public during times of emergency using as many “communications pathways as practicable.”¹ FM radio on mobile devices is a possible and pragmatic pathway that is not currently being utilized.

¹ The Rehabilitation Engineering Research Center on Wireless Inclusive Technologies (Wireless RERC) is funded 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).

- A synergistic relationship between the traditional broadcast industry and the wireless industry could remedy emergency alert and information access concerns held by providers (network congestion), emergency managers (timeliness of message), and by citizens (full access in the most expedient modality).
- Americans living with disabilities are at greater risk of injury and harm during an emergency because the means of attaining information may not be conveyed in a way by which they can discern. A drastic reduction in the number of deaths and injuries could occur if proper communication coupled with accurate forecasting were implemented. We estimated \$33 million of related medical expenses over the past ten years could have been avoided.²

These documents are provided to the FCC (Chairman's Office, Disability Advisory Committee, Consumer and Governmental Affairs Bureau, and the Public Safety and Homeland Security Bureau), FEMA, IPAWS, and other stakeholders. The intent is to supply unbiased considerations to help ensure that individuals with disabilities and other populations disproportionately impacted by disasters have alternative and accessible means to receive emergency information when cell coverage is disrupted, and access to power is limited. Should you have any questions concerning this filing, please do not hesitate to contact us.

Respectfully submitted,



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Principal Investigator, Wireless RERC
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¹ FEMA. (2010). Strategic plan for the integrated public alert and warning system (IPAWS) program. Retrieved from https://www.fema.gov/pdf/emergency/ipaws/ipaws_strategic_plan.pdf

² The estimate is based on NWS statistics concerning injuries and fatalities as a result of weather events and extant research on the average costs of emergency room visits.