

**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

Wireless Emergency Alerts

PS Docket No. 15-91

Amendment of Part 11 of the Commission's Rules
Regarding the Emergency Alert System

PS Docket No. 15-94

REPLY COMMENTS OF APCO INTERNATIONAL

The Association of Public-Safety Communications Officials International, Inc. (APCO) respectfully submits these reply comments in response to the Federal Communications Commission's Further Notice of Proposed Rulemaking in which the Commission continues its comprehensive review of the Emergency Alert System (EAS) and Wireless Emergency Alerts (WEA).¹ We commend the FCC for prioritizing improvements to the nation's alerting systems, through which it advances its statutory "purpose of promoting safety of life and property through the use of wire and radio communications."² EAS and WEA save lives by delivering timely, actionable warnings to people affected by emergencies. But alerts only save lives when the people who need them receive them and trust them enough to take protective action. We therefore urge the Commission to prioritize improvements to two essential aspects of alerting: (1) ensuring that alerts are authentic and validated, thereby eliminating or significantly reducing the risk of false alerts resulting from unauthorized or invalid transmissions; and (2) tightening geotargeting so that alerts are only received by those for whom they are intended and relevant.³

¹ *Modernization of the Nation's Alerting Systems* et al., PS Docket Nos. 25-224, 22-329, 15-91, and 15-94, Report and Order in PS Dockets 25-224 and 22-329, and Further Notice of Proposed Rulemaking in PS Dockets 25-224, 15-94, and 15-91, FCC 26-38 (June 29, 2026) (*Report and Order* or *Further Notice*, as appropriate).

² 47 U.S.C. § 151.

³ APCO has previously expressed support for efforts to make EAS and WEA more resilient, flexible, and useful. In particular, as relevant to the proposals in the *Further Notice*, we believe embedded multimedia content can make a properly delivered WEA more informative and actionable. See Reply Comments of APCO International, PS Docket

We support the Commission’s consideration of measures to ensure that alerts are authentic, such as a requirement that EAS Participants reject alerts that do not include a valid digital signature.⁴ We believe that the benefits to public safety of requiring authentication should be given substantial weight,⁵ and urge the Commission to use its authorities to advance workable authentication solutions. The public must be able to trust that every alert they receive is authentic, authorized, and delivered with the integrity of the original message intact. Security and authenticity are critical, because a false alert can cause chaos when the public needs certainty the most. A false alert could prompt unnecessary protective actions, divert scarce emergency-response resources, and interfere with the delivery of accurate information during a real emergency. Even an isolated incident could undermine confidence in EAS and WEA, causing people to hesitate, disregard future warnings, or opt out of receiving alerts.

Likewise, poor geotargeting erodes trust: people who receive irrelevant alerts may opt out, while alert originators—including APCO members—may hesitate to send warnings for fear of contributing to alert fatigue.⁶ We therefore support permitting EAS Participants to use the detailed location information often available in CAP EAS messages.⁷ Relaxing the current requirement that EAS Participants target alerts only by county codes may allow them to tailor alerts more precisely to their audiences and spare

No. 25-224, at 8-9 (Nov. 18, 2025). That remains true. At the same time, as the Commission considers additional functionality, it first should ensure that core capabilities are working as intended.

⁴ *Further Notice* at 26 ¶ 41. CSRIC VI Working Group 2 recommended that all CAP messages that are intended for transmission as EAS messages must have a valid digital signature and that EAS Participants reject CAP messages that lack a valid signature, rather than rejecting messages with invalid signatures. CSRIC VI EAS Security Report at 23 § 6.2.1; *see also id.* at 33, § 7.

⁵ *See* New York City Emergency Management Department Comments at 1-2 (arguing that requiring digital signatures for all CAP EAS alerts is critical “regardless of the potential impact to non-IPAWS CAP EAS systems”).

⁶ Other representatives of alert originators agree. *See, e.g.,* Attorney General of New York, et al., Comments at 10-11 (discussing “alert fatigue” and its effects); San Mateo County Comments at 2-3 (describing how county-level targeting causes “overbroad alerts” and “a systematic under-utilization of EAS”); City of Austin Comments at 2 (“Inconsistent or unreliable geotargeting can undermine public confidence and create significant operational challenges when alerting populations.”); New York City Emergency Management Department Comments at 5-6 (“EAS is being underutilized due to its limited geotargeting capabilities. . . . For this reason, and because more and more individuals are solely utilizing streaming services, NYCEM has never activated an EAS alert and reserves its use for only the most impactful, life-threatening emergencies that impact all New Yorkers in all counties of NYC.”).

⁷ *Further Notice* at 40 ¶ 70.

others from irrelevant alerts.⁸ Enabling partial county alerting and delegating authority to the Public Safety and Homeland Security Bureau to adopt new EAS location codes would provide additional flexibility as geotargeting capabilities evolve.⁹ For WEA, the Commission should give full consideration to eliminating exceptions to its geotargeting rule,¹⁰ as well as enforcing its requirements. While we recognize that privacy, battery usage, and device limitations are relevant to the elimination of the exception for devices with location services disabled, the significant public safety benefits of more precise geotargeting should weigh heavily in the Commission's analysis.

By prioritizing reliable authentication and more precise geotargeting, the Commission can strengthen the foundation on which effective public alerting depends.

Respectfully submitted,
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⁸ See 47 CFR § 11.31(c) (specifying the use of PSSCCC location codes, which require alerts to be targeted using state and county numeric identifiers).

⁹ See New York City Emergency Management Department Comments at 6 (supporting the development of a streamlined process for creating new EAS location codes); City of Austin Comments at 2 (supporting allowing EAS participants to use location information available through CAP); San Mateo County Comments at 3 (pointing to successful sub-county alerting in Sonoma County).

¹⁰ 47 CFR § 10.450.