



February 11, 2009

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Mark Wood, mark.wood@engineer.com
ITU-T SG2

Re: Response to Draft ITU-T Recommendation on Administration and allocation of multicast addresses for civic purposes

Dear Mr. Wood,

Thank you for your correspondence and Liaison titled "Draft ITU-T Recommendation on the Administration and allocation of multicast addresses for civic purposes". ATIS WTSC has reviewed the draft Recommendation and has the following comments.

1. The administration and allocation of multicast addresses for civic purposes, which are Cell Broadcast Message Identifiers in 3GPP technology, is outside the scope of responsibility for ITU-T. The allocation of the cell broadcast message identifiers is a technology and an inter-operator business function related to the implementation of the Cell Broadcast Service. The allocation of the cell broadcast message identifiers is controlled and managed by 3GPP CT1, as well as the GSM Association which handles the inter-operator business functions, for 3GPP technologies.
2. The draft ITU-T Recommendation proposes two solutions for the support of language. Having two solutions complicates both the mobile device and the user experience. From the mobile device point of view, both solutions would have to be implemented because of subscriber roaming. The two solutions would complicate the user experience since the subscriber will not know which method is implemented in a roaming environment.
3. The draft ITU-T Recommendation is based upon the assumption that the subscriber's control of the alert information should be based upon the source of the information instead of the risk associated with the alert situation. Existing emergency alert systems based upon the Common Alert Protocol (CAP) such as the United States Emergency Alert System (EAS), as well the developing 3GPP PWS and the Commercial Mobile Alert System (CMAS) in the United States (which is also supported by PWS), are built on the philosophy that it does not matter which authorized agency is alerting the subscriber of an imminent threat and that the subscriber's control of the alerts is based upon the subscriber's acceptable risk level. The risk level is indicated by the combination of the urgency, certainty, and severity attributes of the CAP alert message from the alert initiator. Different Cell Broadcast message identifiers would be associated with different combinations of the urgency, certainty, and severity attributes giving the subscriber the choice to receive alerts based upon their personal risk assessment. (Regional regulatory requirements may prohibit some alerts from being disabled by the subscriber).

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4. Since the configuration of the Cell Broadcast message identifiers for the subscriber preferences would be based upon factors such as the CAP message urgency, certainty, and severity attributes and upon subscriber language preferences, direct subscriber configuration of the Cell Broadcast options, as proposed by the draft ITU-T Recommendation, is too complicated. A simple subscriber interaction is required. For example, for the CMAS service in the United States, the subscriber will not interact with the Cell Broadcast configuration on the mobile device. Instead, the subscriber interacts with a simple CMAS alert option configuration page on their mobile device and the CMAS application on the mobile device would then configure the Cell Broadcast message identifiers based upon the options selected. The description of the CMAS subscriber interface is defined in the joint ATIS / TIA CMAS Mobile Device Behavior Specification (ATIS-TIA-J-STD-100) which is scheduled to be released for publication in 1Q 2009. Furthermore, all of the Cell Broadcast message identifiers assigned to PWS, including Earthquake and Tsunami Warning System (ETWS) and CMAS, will be allocated in a range which is not settable by the mobile device man-machine interface (MMI) and, therefore, cannot be manipulated directly by the subscriber.

Based upon ATIS WTSC analysis of the draft ITU-T Recommendation, the proposed administration and allocation of multicast addresses for civic purposes appears to be inconsistent with the requirements under development for CMAS. These inconsistencies could potentially result in fragmentation of Public Warning System implementations in the industry, as well as overlap and inconsistencies of Cell Broadcast message identifiers.

Regards,

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