TIA Committee TR-45
Comments on ITU-T SG 2 Liaison Statement Regarding
Cell Broadcast Message Identifiers

TR-45 offers the following comments on the proposal to Harmonize Cell Broadcasting Message Source Identifier uses for civic purposes . These comments are grouped into Procedural Comments and Technical Comments.

Procedural Comments

1. In regards to Q.1/2 on the cover liaison, the ad-hoc on Cell Broadcast Message Identifier assignments which was held at the joint OASIS/ITU workshop in August 2006 was an unadvertised ad-hoc activity of the workshop and, therefore, all interested parties were not aware of the activity and were not able to participate or provide proper contributions.

2. The Abstract of Annex 1 of this liaison mentions "the interim agreement in the USA and Netherlands related to the common use of the code 920". This statement is not accurate since this statement does not represent a consensus position within the United States. The joint report from ITU-T/OASIS contained in Annex 1 clearly indicates that the interim agreement is between the Dutch trial and a small trial in Wisconsin, USA and thus does not represent a United States position.

3. The Introduction of Annex 1 of this liaison mentions "it is a national matter whether or not Cell Broadcast is introduced". In the United States and under the WARN Act, carrier support of public warning is optional. If the carrier elects to provide public warning services, the delivery technology is the carrier's choice. Therefore, Cell Broadcast introduction is carrier and market driven and not a national matter subject to regulatory requirements. This same section also states "if an NRA chooses to permit the deployment of Cell Broadcasting" which is again is an inaccurate statement for the United States since deployment will be carrier and market driven.

4. The Discussion of Annex 1 of this liaison contains "Initial investigation of the available bands (or ranges) has shown that the 'Band' (range) of MIs between 900-999 (decimal) is an appropriate range for the purpose of alerting." The discussion also states "Further investigation has identified the additional range (or band) of 500-599 for civic purposes." These statements raise the following questions to the ITU-T Study Group 2:

    a. Who did the initial and further investigations?

    b. Where are the results of the initial and further investigations published?

c. What was the process and procedures utilized for these investigations? For example, how were contributions solicited and processed? How was consensus gained that this report was complete? Did this investigation report follow the full ITU process including posting for public comments?

d. Which standards organizations, industry forums, and regional regulatory agencies have reviewed and approved these investigations? Specifically, the appropriate set of reviewing organization should include 3GPP, 3GPP2, GSM Association, GSM Association North American Regional Interest Group (GSM-NA), ATIS, FCC CMSAAC, TIA, and the US State Department.

e. Do results of these investigations have buy-in from manufacturers and carriers worldwide?

f. Did these investigations account for the ongoing regional regulatory activities? (see comment #7)

5. The report from the joint ITU-T/OASIS contained in Annex 1 specifically states MI 920 is an interim use of a message identifier "pending engagement by the relevant standards committee". 3GPP, the Organizational Partners of 3GPP such as ATIS and ETSI, as well as the GSM Association, are relevant standards committees for this activity and must be engaged for the GSM cell broadcast service. 3GPP2 and TIA are relevant standards committees for this activity for CDMA cell broadcast capabilities.

6. Requirements for the support of wireless alerts for public warning purposes are currently being defined on a regional regulatory basis. There is no activity to align these regional regulatory requirements on a global basis. Therefore, it is premature to assign any specific message identifiers or channel ranges until all of the regional regulatory requirements are known and the evaluation of the alignment of all of these regional regulatory requirements has been conducted.

7. There are also several industry activities currently underway regarding wireless alerts for public warning. These activities include but are not limited to the FCC Commercial Mobile Service Alert Advisory Committee (CMSAAC), the 3GPP SA1 Public Warning System (PWS) project, and the ETSI Emergency Telecommunications (EMTEL) project. Consequently, it is premature to assign any specific message identifiers or channel ranges until the activities of these industry activities have been completed.

Technical Comments

8. Even though all of the requirements for wireless alerting are not known in the United States, there are some requirements that has been identified in the legislation of the WARN Act. Specifically, the WARN Act contains requirements for the support of Presidential and non-Presidential wireless alert messages. Under the WARN Act, the subscriber could have the option to

suppress the presentation of non-Presidential wireless alerts but would always receive Presidential wireless alerts. An assignment of a cell broadcast message identifier in the range of 100 to 1000 would not comply with this requirement since the message identifiers or channel numbers in this range are configurable by the end user and can be disabled. Or in other words, if the Presidential wireless alert is sent with a message identifier or a channel number of less than 1000, the subscriber would be able to suppress the presentation of the Presidential alert which is in violation of the WARN Act.

9. Support of multiple languages is mandatory in some countries such as Canada and is an option that might be supported in other countries. However, the proposal in the liaison statement does not address the support of multiple languages. A single cell broadcast message identifier or channel number may not be the most effective and efficient method for the support of multiple languages.

10. Cell broadcast message identifiers or channel numbers are specific to only the GSM version of Cell Broadcast and have no applicability to CDMA based or other technology based implementations. Consequently, any assignments or allocations of cell broadcast message identifiers or channel numbers are GSM specific implementation and interworking issues. Since one of the major objectives of the GSM Association is to address implementation and interworking among GSM operators, the GSM Association should undertake the interworking and interoperability issues of wireless alerts among the GSM operators of the various regions of the world including differences in regional regulatory requirements and usage of cell broadcast message identifiers or channel numbers.