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February 17, 2023

VIA ELECTRONIC SUBMISSION

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Multilingual Emergency Communications, EB Docket Nos. 06-119 and 04-296

Dear Chairwoman Rosenworcel:

The Multicultural Media, Telecom and Internet Council (“MMTC”) respectfully submits this letter in response to the Commission’s recent action seeking information from the nation’s nine largest providers of Wireless Emergency Alerts (“WEA”) on how to provide WEA in languages other than English and Spanish.¹ MMTC supports the Commission’s efforts to explore ways to expand the delivery of multilingual WEA communications to communities across the country, which have a diversity of language needs. However, MMTC wishes to draw the Commission’s attention to the regretful fact that the Petition for Immediate Interim Relief (“Petition”) that it and other partner organizations filed back in 2005 — which called for a revision of the Commission’s rules to facilitate the dissemination of multilingual local, state, and national emergency information via the Emergency Alert System (“EAS”) — remains pending nearly two

¹ See Press Release, Chairwoman Rosenworcel Seeks Information on Supporting Wireless Emergency Alerts in More Languages (Feb. 13, 2023), <https://docs.fcc.gov/public/attachments/DOC-391084A1.pdf>.

decades later.² A recent news article has reported that the Commission's focus on the issue of multilingual emergency alerts has moved from the EAS-based "Designated Hitter" system proposed by MMTC³ to a model centered on WEA.⁴ If true, this shift represents an unfortunate step backward from the Commission's goal of ensuring that people from a variety of language backgrounds are armed with critical information during and in the immediate wake of a life-threatening emergency. Although wireless providers generally do a good job of relaying multilingual emergency information in advance of anticipated disasters, cell towers and other systems making up wireless infrastructure are often compromised or taken entirely offline when disaster actually strikes,⁵ leaving radio stations with back-up generators among the few sources of mass communications still operating during such events. Accordingly, MMTC urges the Commission to act on the Petition as soon as possible and to adopt the "Designated Hitter" proposal, which would ensure that at least one commercial or noncommercial full power radio station capable of remaining on air during emergencies can arrange in advance to broadcast life-saving emergency alerts in multiple languages.

Please let me know if you have any questions on this submission. A copy of this letter has been filed in the above-referenced dockets via the Commission's Electronic Comment Filing System.

² See Minority Media & Telecom. Council et al., Petition for Immediate Interim Relief, EB Docket No. 04-296 (filed Sept. 20, 2005); see also *MMTC v. FCC*, 873 F.3d 932, 935 (D.C. Cir. 2017) (observing that the Commission has been studying multilingual emergency alerts "on what one might call 'bureaucracy standard time'").

³ See Letter from the Multicultural Media, Telecom and Internet Council to Marlene H. Dortch, Sec'y, Fed. Commc'ns Comm'n, EB Docket Nos. 06-119, 04-296 (Mar. 10, 2022); Letter from Multicultural Media, Telecom and Internet Council & League of United Latin Am. Citizens to Chairman Ajit Pai et al., Fed. Commc'ns Comm'n, EB Docket Nos. 06-119, 04-296 (May 19, 2020).

⁴ See *FCC Still Wants Multilingual Emergency Alerts, But Its Focus Has Turned to Wireless Alerts*, Inside Radio (Feb. 15, 2023), https://www.insideradio.com/free/fcc-still-wants-multilingual-emergency-alerts-but-its-focus-has-turned-to-wireless-alerts/article_ab688c0c-ad07-11ed-bb79-f39bec6b3186.html#:~:text=Now%20the%20FCC%20is%20looking%20at%20another%20path,beyond%20English%20and%20Spanish%20on%20the%20WEA%20system.

⁵ See, e.g., Jon Brodtkin, *Hurricane Sandy Also Disrupts Cellular Networks and Wired Internet*, Ars Technica (Oct. 30, 2012, 4:05 PM), <https://arstechnica.com/information-technology/2012/10/hurricane-sandy-also-disrupts-cellular-networks-and-wired-internet> (reporting that both wireless and wireline services throughout the Northeast and Mid-Atlantic were disrupted as a result of Hurricane Sandy); *Wireless Operators Scramble to Recover from Katrina*, RCR Wireless News (Aug. 31, 2005), <https://www.rcrwireless.com/20050831/archived-articles/wireless-operators-scramble-to-recover-from-katrina> (reporting that wireless services were "severed completely" in communities impacted by Hurricane Katrina due to power outages caused by strong winds and flooding).

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Respectfully submitted,

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