

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**Independent Panel Reviewing the** )  
 )  
**Impact of Hurricane Katrina on** ) **DA 06-925**  
 )  
**Communications Networks** )  
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**COMMENTS OF AGILE COMMUNICATIONS GROUP**

Agile Communications Group (“ACG”) hereby submits its comments to the Federal Communications Commission (“Commission”) in response to the Commission’s *Public Notice* regarding the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks (“Panel”).<sup>1</sup> ACG is a Tampa, Florida-based designer and provider of mobile wireless communications applications, including emergency alert notification systems utilizing Short Message Service (“SMS”) or text messaging functionality, serving domestic and international customers with innovative and cutting-edge products.<sup>2</sup> ACG appreciates the opportunity to submit its comments on improving disaster preparedness, network reliability, and communications among first responders.

As recognized by several Panel hearing witnesses to date, ACG believes that existing SMS wireless technology has been, can be, and will be a valuable communications technology for first responders in catastrophic situations, such as Hurricane Katrina. Immediately following the devastating impact of Hurricane Katrina, ACG offered its services free of charge to various

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<sup>1</sup> *FCC’s Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks Announces Next Meeting Scheduled for May 12, 2006, at FCC Headquarters*, Public Notice, DA 06-925, rel. April 26, 2006. (“*Public Notice*”)

<sup>2</sup> ACG was previously known as Airit2me, Inc. and has filed comments under the name of Airit2me, Inc. in the Commission’s proceeding in EB Docket No. 02-496, Review of the Emergency Alert System.

disaster relief organizations, including the American Red Cross. ACG strongly believes that its wireless SMS platform could have been and should be used to provide an effective emergency alert system to first responders and to connect families and missing persons when landline networks are down due to storm-related damages.

ACG is also aware of the practical benefits of using SMS technology to reach out to the deaf community and provide a necessary emergency communications mechanism. We support the incorporation of a Common Alerting Protocol into the emergency regulatory structure to facilitate timely and effective notification to the entire disability community through delivery of information to multiple devices.<sup>3</sup>

Presently, ACG is offering to local government agencies the ability to provide alert notification systems that complement the existing Emergency Alert System (“EAS”) by providing greater efficiency and redundancy for emergency alerts directed to key local public safety officials in times of crisis and disaster. The communication channels that can be utilized for alerting via the ACG platform include wireless SMS-based alerts, voice-based IVR alerts, pager alerts, and email alerts.

While the technology used by ACG’s alert notification product has the capability to reach hundreds of thousands of people in a relatively short amount of time, ACG recognizes and appreciates that a wireless SMS-based emergency alert notification system does have certain practical limitations. ACG understands that a mass alert to the population in a large metropolitan area via SMS may take too long and has the potential to cause congestion and possible failure of the networks of wireless carriers, which may in fact hinder the ability of local public safety officials, first responders, and emergency dispatchers to communicate as needed in a time of

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<sup>3</sup> See Joint Statement of the American Council of the Blind and the American Foundation for the Blind at p. 4, filed May 3, 2006; Statement of Consortium for Citizens with Disabilities at p.4, filed April 13, 2006.

crisis. Further, ACG fully understands and agrees that any wireless SMS alert system must not interfere with wireless carriers' existing obligations to serve emergency communications needs. However, ACG envisions wireless SMS-based notifications as an enhancement to the EAS and other emergency alert notification systems by providing an efficient and directed means of getting alerts to key public officials in a timely basis, regardless of the location of the key personnel, or for connecting missing and lost individuals with family, friends, and loved ones in the aftermath of a disaster.

ACG's SMS-based alert notification system has the logical ability to escalate the alert to individuals or groups in cascading manner until someone in the chain-of-alert is reached. Escalation can also occur among different communications channels (*i.e.* SMS to voice) used by the intended recipient until receipt of the alert is confirmed. Alert delivery can be tracked and receipt acknowledgment generated to ensure the recipient has not only received but also read the critical messages.

ACG also appreciates the practical concern that SMS text messages are limited to 140-160 characters per message. While ACG understands that this message size limitation may be problematic for longer messages, we do not believe that a good solution should be thrown out in the illusive search for the perfect solution. A single SMS can convey a significant amount of information within the bounds of the existing size limit. Within the existing SMS message size limit, an emergency alert message devoted to communicating with key first responders or reconnecting lost individuals could employ templates for messages to deal with anticipated emergency situations. The first responder personnel would follow pre-determined assigned protocols or courses of action upon receipt of specific test message prompts. SMS messages also

could be sent out in succession at a time of crisis in order to get out longer alerts that exceed the size limitation for a single SMS message.

In sum, current wireless SMS-based technologies can and should be used for providing an efficient and timely emergency notification alert mechanism to key public officials and for connecting missing persons in times of crisis and disaster. As a result, the Panel should recommend and encourage the use of wireless SMS-based emergency alert solutions to augment and improve disaster preparedness and communications among first responders.

Respectfully submitted,

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