

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91
	)	
Amendments to Part 11 of the Commission's Rules	)	PS Docket No. 15-94
Regarding the Emergency Alert System	)	
	)	
Modernization of the Nation's Alerting Systems	)	PS Docket No. 25-224

**WRITTEN EX PARTE PRESENTATION OF INTERNATIONAL DEAF
EMERGENCY, INC.**

*Completion of the deferred multilingual template set, and American Sign Language on the same
footing as the written languages*

International Deaf Emergency, Inc. ("IDE") is a Deaf-led 501(c)(3) nonprofit organization that has worked in disaster risk reduction with Deaf communities since the 2010 Haiti earthquake. Its president, who signs this letter, is Deaf. IDE builds Deaflare, an emergency alerting application for people who are Deaf, DeafBlind, and hard of hearing, which receives FEMA's IPAWS All-Hazards Information Feed and the National Weather Service alert feed and renders each alert through visual, tactile, and auditory channels; it is in testing and will be free to use. IDE works with FEMA's IPAWS program under a Memorandum of Agreement signed August 25, 2026, and filed comments in these dockets on August 31, 2026 (ECFS Filing 26110073861).

IDE submits this presentation pursuant to paragraph 42 of *Multilingual Wireless Emergency Alerts*, Report and Order, DA 25-12, PS Docket Nos. 15-91 and 15-94 (PSHSB, released January 8, 2025) ("DA 25-12"), in which the Bureau agreed that "alert originators, community-based organizations that represent the language communities, or other members of the public should petition the Chief of the Bureau whenever they have specific suggestions to improve or change the templates." Bureau staff, asked how these matters should be raised, advised that a filing in the docket is the proper channel; that advice was procedural, and this is IDE's first presentation of them. Each request concerns an issue that the Bureau left open or identified for future consideration. IDE respectfully leaves the appropriate procedural vehicle to the Bureau.

The footing ASL already has, and the footing IDE asks the Bureau to keep

DA 25-12 made American Sign Language a language of the template program. Participating CMS Providers must support pre-scripted templates for eighteen events (47 CFR § 10.480(c)) in English and thirteen written languages (§ 10.480(d)), and must support non-fillable ASL templates "for each

of the events listed in paragraph (c)” (§ 10.480(f)). The Bureau adopted the ASL templates in Appendix D as signed by a Certified Deaf Interpreter (CDI) and holds the original recordings. DA 25-12, paras. 31–32. For what exists today, ASL therefore has the same event coverage and the same provider-support obligation as the written languages. IDE thanks the Bureau for that decision; it is the reason Deaf people will receive any signed WEA content at all.

IDE’s position is that this footing should be kept as the program grows: no template, guidance, test, or compliance date should be issued for the written languages without its ASL counterpart issued at the same time and to the same standard. The sections below apply that one principle to the work the Bureau left open.

1. A confirmation the Bureau can give now, whatever else it decides

In footnote 32 to paragraph 11 of DA 25-12, the Bureau stated that whether Participating CMS Providers should be required to support additional templates, including an “all-clear” template, remained under consideration. IDE reads section 10.480(f) as tying the ASL duty to the list of events in section 10.480(c), so that an event added to paragraph (c) would, on the face of the rule, fall within paragraph (f). IDE does not ask the Bureau to restate that. Three things the text does not settle: whether the Bureau will produce and publish the corresponding ASL video at the time an additional template is adopted; whether that video will be signed by a Certified Deaf Interpreter, as the eighteen adopted templates are; and whether Participating CMS Providers will be required to support it on the same implementation schedule as the written-language versions of the same template.

IDE respectfully asks the Bureau to confirm that, whenever it adopts an additional pre-scripted WEA template or adds an event to section 10.480(c), it will concurrently provide a corresponding non-fillable ASL video template signed by a Certified Deaf Interpreter, and will require Participating CMS Providers to support that template on the same implementation schedule as the corresponding written-language templates. If the ASL version travels with each new template, people who rely on ASL receive access on the same implementation schedule as users of the written-language templates. If it does not, each newly adopted template opens an interval during which the template exists in English and the supported written languages and does not exist in ASL, and closing that interval requires a further step that may take longer than the template itself took to adopt. Settling this now costs the Commission little: the templates mentioned in footnote 32 have not been adopted, so no obligation is disturbed and no party is asked to change anything today, and a statement of the Bureau’s practice would let Participating CMS Providers, device manufacturers, alert originators, and accessibility organizations plan against a common understanding rather than inconsistent assumptions.

2. Complete the deferred consideration and adopt an all-clear template

The current multilingual template set provides no pre-scripted means of communicating that a specified warning has ended. Silence is inherently ambiguous: it does not tell a recipient whether the danger has ended, connectivity has failed, or no further message was sent. For a person who cannot rely on audible public-warning cues, the ambiguity is not resolved by the sounds around them. An appropriately designed status-ending template would convert that ambiguity into an affirmative message, for everyone and in every supported language.

IDE is aware that, in the record underlying DA 25-12, ATIS opposed an all-clear template and APCO generally supported all-clear templates. IDE's answer to the opposition is practical. An additional template would use the same basic pre-provisioned architecture as the existing eighteen templates, although additional standards, testing, storage, and deployment work may be required, and IDE asks the Bureau to weigh that work against the gap the template closes. Its use would remain entirely at the originator's discretion. The Bureau would hold its ASL rendition as it holds the eighteen adopted ones (DA 25-12, para. 32).

If the Bureau adopts an all-clear template, IDE offers two design observations from its own implementation, on their own merits and not as a condition of the request. The message should name what has ended rather than only announce a general safety state ("FLOOD WARNING ENDED. Continue to avoid flooded roads." rather than "All clear" alone), and the presentation should be distinguishable from an alarm on every channel, so that a person who perceives it by touch or light alone can tell relief from danger before reading a word.

3. The deferred candidates already include ones the Deaf community itself asked for

The record the Bureau deferred in footnote 32 contains proposals for severe cold temperatures and ice storms from the Northern Virginia Resource Center for Deaf and Hard of Hearing People, for extreme heat and severe winter storms from the National Hispanic Media Coalition, and for fillable AMBER templates from New York City Emergency Management. IDE supports completing the consideration of these candidates on the merits, with the confirmation sought in section 1 applied to whichever are adopted.

4. Fillable ASL: a revisit trigger rather than an open horizon

The written languages carry four fillable elements that customize each template to the event: the sending agency, the location, the end time, and a URL (§ 10.480(e)). ASL does not, because the Bureau found fillable ASL templates "not technically feasible at this time" (DA 25-12, para. 31). IDE does not contest the finding on the present record. IDE asks only that "at this time" be given a date: a stated point, or a triggering event such as the June 12, 2028 compliance date for the templates adopted in DA 25-12 (91 FR 2317), at which the Bureau revisits feasibility on a fresh record. A finding made on a 2024 record should not become permanent by default, because as long as it stands the four elements that tell a person where and until when are available in fourteen written languages and in none of the signed ones.

IDE's own application pre-provisions the Bureau's official ASL template videos on unmodified consumer phones and offers the matching template for offline playback when an alert arrives, with the alert's event-specific details carried alongside it as text and the video labeled as explaining the alert type rather than translating the particular message. That parallels the architecture the Bureau adopted at paragraphs 31 and 33, although it operates through an application rather than through WEA itself. IDE does not claim to have solved fillable ASL, and says so plainly. IDE offers that implementation experience, and any results it is able to report, whenever the Bureau takes the question up again.

5. Offer

IDE makes its implementation, its open specification, and its Deaf and DeafBlind community networks available to the Bureau for any of the above, and would welcome the opportunity to demonstrate the presentation behavior described in section 2.

A point of accuracy about the existing record

IDE does not contend that the deferred templates are missing their ASL versions. Those templates were never adopted, so no corresponding ASL versions were yet required. IDE states this plainly because the opposite reading would misdescribe the record, and IDE would rather be correct than forceful.

Conclusion

IDE respectfully asks the Bureau to confirm that any additional pre-scripted WEA template, or any event added to section 10.480(c), will be accompanied at adoption by a corresponding non-fillable ASL template signed by a Certified Deaf Interpreter, supported by Participating CMS Providers on the same implementation schedule as the written-language templates; to complete its deferred consideration and adopt an all-clear template; to consider on the merits the further candidates already in the record; and to set a date or trigger for revisiting the feasibility of fillable ASL templates.

Respectfully submitted,

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IDE's president is Deaf. Please direct any follow-up to the email address above, or by videophone through video relay service. IDE cannot take voice telephone calls.

cc (by email, after dissemination): Joshua Gehret and James Zigouris, Cybersecurity and Communications Reliability Division, PSHSB

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