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July 14, 2023

Shabbir Hamid
Attorney Advisor,
Cybersecurity and Communications Reliability Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554 Via Electronic Filing

Re: Notice of Ex Parte Letter, PS Docket No. 15-80, PS Docket No. 13-75 and ET Docket No. 04-35

Dear Mr. Hamid,

On June 20, 2023, I filed an *ex parte* letter in the above dockets. In that letter, I discussed the steps FailSafe Communications, Inc. ("FailSafe") was making toward a demonstration of Telesentient™ technology for the Staff. That letter also discussed a GIS provider that has been working with FailSafe on a confidential basis.

The purpose of this letter is to update the Commission Staff on the progress that has been made with that provider.

Background

The GIS provider we referred to in our previous communication to you is the Pacific Disaster Center ("PDC"). Established by the US Congress in 1994, PDC works to reduce disaster risks to people's lives and property, by providing information, technologies and solutions for disaster preparedness, mitigation, response, and recovery to emergency managers and governmental decision makers. PDC's clients and its partner organizations include national governments, military commands, transnational collaborators, and others. See www.pdc.org.

As an applied research and technology center managed by University of Hawaii under a cooperative agreement with the U.S. Department of Defense, PDC has developed state-of-the-art geospatial data

visualization and near real-time monitoring and notification technologies, linking the scientific and humanitarian communities with the decision makers for nearly 30 years.

PDC has agreed in principle to allow FailSafe to make use of its base platform, known as DisasterAWARE® which has evolved over time and is in daily operational use by the PDC clients, stakeholders and the general public.[1]

FailSafe CEO Leo A. Wrobel has been a longtime stalwart of the PDC. As far back as 2008, Mr. Wrobel and the PDC published "*Disaster Recovery Planning for Communications and Critical Infrastructure*"[2] © Artech House Books. While technology has changed since then, the bullet points on the back cover of their book (See Attachment A) are as appropriate today as they were in 2008.

Mr. Wrobel and the PDC began exploring ways to illustrate TeleSentient™ on the largely federally-funded DisasterAWARE platform shortly before the COVID-19 pandemic began. We have since successfully proven the feasibility of displaying signaling network data in correlation with natural disasters and other causes using this system.

The remainder of this update describes the demonstration and highlights other capabilities we believe will interest the FCC, including Customized Alerts. The following page contains numerous hyperlinks that further demonstrates the capabilities of both TeleSentient™ and DisasterAWARE. When prompted by the blue "Watch Tutorial" box, please click there. It will demonstrate the specific capability in a few seconds and save the reader a lot of time.

Our demonstration will integrate our call-center data with DisasterAWARE, a risk intelligence platform that serves national governments, civil protection agencies, and nongovernmental organizations around the globe. It offers the most powerful and reliable early warning, multi-hazard monitoring, and decision support tools to aid effective decision making. The following list contains the capabilities of DisasterAWARE that we believe will be the most interesting to the FCC in combination with TeleSentient.™

- Identify Layers of Interest and Produce Summary Reports
- Ability to Import Assets (Like 911 Centers and Wire Centers)
- Ability to zoom down to street level
- Correlate with Media Hotspots
- Live Camera Monitoring and Integration
- Bookmark and Share with Other Agencies
- Search for Specific Layers (6500+ data layers)
- Create Custom Maps

Specific to the FCC notification requirements, DisasterAWARE has proprietary SmartAlert™ technology that allows users to "geo-fence" areas of interest or proximity to "assets" and receive near real-time notifications based on a hazard's "exposure area", type and severity. It allows users to

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1 PDC's DisasterAlert™ app is available in Apple and Google stores, independently ranked in top 5 applications for disaster awareness, and has over 2M downloads.

2 © Artech House Books. This book and others like it can still be found on Amazon and other outlets.

monitor hazards and quickly assess potential threats to people, property, or critical assets at any time, in real time. The same principles may be applied to the Telesentient data, for instance, triggering notifications if many emergency calls fail to connect within a certain area. Of course, business rules need to be defined based on licensees preference, but our proof of concept has validated the most common assumptions and preferences.

Our Demonstration to the FCC

You will recall in my previous communication to the FCC I cited a case where the PDC mapped weather in Oklahoma and correlated that information with TeleSentient data showing the location of every central office in Oklahoma - during a holiday period – and in only a couple of hours. As the hyperlinks above illustrate, this response only scratched the surface of the PDC's capabilities.

At the time of this writing our CEO Leo A. Wrobel is visiting PDC headquarters in Hawaii in order to refine and explore parameters for an FCC demonstration. We have dedicated expert staff converting and transforming signaling network data derived from our partner Tekno Telecom (https://teknotelecom.com/) to Lat/Lon and other attributes that can be used by the PDC's DisasterAWARE (test instance) in the demonstration which will include visualization of these data.

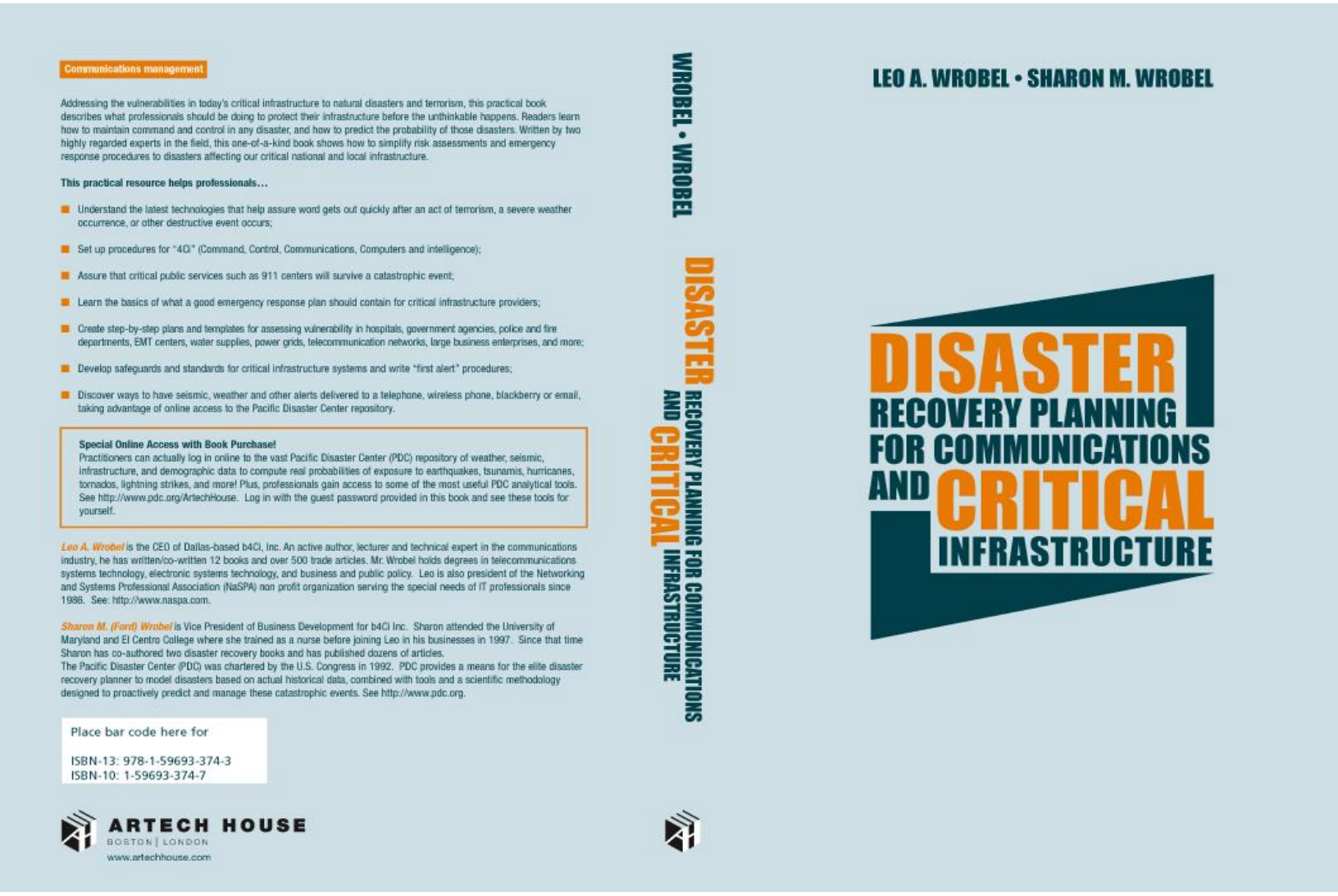
Both FailSafe and the PDC have already proven the feasibility of this integration but understand that the FCC will want to see it for themselves. Once your agency has seen the TeleSentient/ DisasterAWARE integration with its own eyes, it may wish to coordinate directly with the PDC to explore other capabilities described in the hyperlinks above for use in subsequent revisions and updates. We look forward to this demonstration and invite your comments.

Sincerely,

/ s / Eddie M. Pope

General Counsel, FailSafe Communications, Inc.

ATTACHMENT A



Communications management

Addressing the vulnerabilities in today's critical infrastructure to natural disasters and terrorism, this practical book describes what professionals should be doing to protect their infrastructure before the unthinkable happens. Readers learn how to maintain command and control in any disaster, and how to predict the probability of those disasters. Written by two highly regarded experts in the field, this one-of-a-kind book shows how to simplify risk assessments and emergency response procedures to disasters affecting our critical national and local infrastructure.

This practical resource helps professionals…

- Understand the latest technologies that help assure word gets out quickly after an act of terrorism, a severe weather occurrence, or other destructive event occurs;
- Set up procedures for "4Ci" (Command, Control, Communications, Computers and intelligence);
- Assure that critical public services such as 911 centers will survive a catastrophic event;
- Learn the basics of what a good emergency response plan should contain for critical infrastructure providers;
- Create step-by-step plans and templates for assessing vulnerability in hospitals, government agencies, police and fire departments, EMT centers, water supplies, power grids, telecommunication networks, large business enterprises, and more;
- Develop safeguards and standards for critical infrastructure systems and write "first alert" procedures;
- Discover ways to have seismic, weather and other alerts delivered to a telephone, wireless phone, blackberry or email, taking advantage of online access to the Pacific Disaster Center repository.

Special Online Access with Book Purchase!
Practitioners can actually log in online to the vast Pacific Disaster Center (PDC) repository of weather, seismic, infrastructure, and demographic data to compute real probabilities of exposure to earthquakes, tsunamis, hurricanes, tornados, lightning strikes, and more! Plus, professionals gain access to some of the most useful PDC analytical tools. See http://www.pdc.org/ArtechHouse. Log in with the guest password provided in this book and see these tools for yourself.

Leo A. Wrobel is the CEO of Dallas-based b4Ci, Inc. An active author, lecturer and technical expert in the communications industry, he has written/co-written 12 books and over 500 trade articles. Mr. Wrobel holds degrees in telecommunications systems technology, electronic systems technology, and business and public policy. Leo is also president of the Networking and Systems Professional Association (NaSPA) non profit organization serving the special needs of IT professionals since 1986. See: http://www.naspa.com.

Sharon M. (Ford) Wrobel is Vice President of Business Development for b4Ci Inc. Sharon attended the University of Maryland and El Centro College where she trained as a nurse before joining Leo in his businesses in 1997. Since that time Sharon has co-authored two disaster recovery books and has published dozens of articles.
The Pacific Disaster Center (PDC) was chartered by the U.S. Congress in 1992. PDC provides a means for the elite disaster recovery planner to model disasters based on actual historical data, combined with tools and a scientific methodology designed to proactively predict and manage these catastrophic events. See http://www.pdc.org.

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