



----- Original Message -----

From: [Steve Root | WeatherBank, Inc.](#)

To: [Wendy Levine - NOAA Federal](#)

Cc: sroot@weatherbank.com

Sent: Sunday, August 31, 2014 7:01 PM

Subject: Re: [AMS_PSL] NWS is Seeking Comments on revised SDD on Support Services for the Emergency Management Community

Hello Wendy,

I have been made aware of a response to your revised SSD on Support Services for the Emergency Management Community rendered by the AccuWeather companies, collectively known as AccuWeather in the attached document.

AccuWeather is a member of the American Weather And Climate Industry Association, the AWCIA, and as its president, I would like to endorse this response on behalf of the organization.

Best,
Steve

Steven A. Root,, CCM
President, AWCIA
AMS Fellow Meteorologist
President & CEO
WeatherBank, Inc.
1015 Waterwood Parkway, Suite J
Edmond, OK 73034
405-359-0773

----- Original Message -----

From: [Wendy Levine - NOAA Federal](#)

To: [undisclosed-recipients:](#)

Sent: Monday, August 25, 2014 10:29 AM

Subject: Fwd: [AMS_PSL] NWS is Seeking Comments on revised SDD on Support Services for the Emergency Management Community

You are receiving this message because you submitted comments to NWS regarding the Service Description Document (SDD) on *Proposed Enhanced Impact-Based Decision Support Services for the Emergency Management Community*.

I wanted to remind you that NWS is seeking comments on the revision to this Service Description Document (see email below) and we would welcome your input to ensure we've adequately addressed any concerns with the original SDD. The comment period officially closes the end of August, but if you are planning to provide feedback and need some additional time, please let me know.

Wendy Levine
National Weather Service
Strategic Planning and Policy Office
301-427-9062

AccuWeather, Inc., through Barry Lee Myers, its Chief Executive Officer, and on behalf of itself and its subsidiary and affiliated companies (including but not limited to companies commonly referred to as AccuWeather International, AccuWeather.com, AccuWeather Sales & Services, AccuWeather Enterprise Solutions, MWX, and the LocatorCentric Companies – collectively “AccuWeather”) hereby formally submits comments to the National Weather Service (NWS) Service Description Document (SDD) of May 2014, “Proposed Enhanced Impact-Based Decision Support Services, for the Emergency Management Community and Government Core Partners, Supporting Events/Incidents Impacting Safety of Life and Property (“SDD policy”)

August 31, 2014

We appreciate the consideration given to the comments AccuWeather and others provided on the initial version of the Service Description Document (SDD) for Enhanced Impact-Based Decision Support Services for the Emergency Management Community.

It is positive that this collective feedback resulted in a new version of the document which incorporates many of the ideas, best practices and concerns that were raised by members of the Weather Enterprise. The strong partnership between The National Weather Service (NWS) and America’s Weather and Climate Industry (AWCI) and other entities within the Weather Enterprise ensures the greatest, most efficient and most effective benefits to the American public especially in the joint mission of saving lives and property and increasing productivity.

After review of the new draft SDD dated May 2014, additional feedback is provided for consideration as the NWS continues to evolve the document and provide additional clarity on the policies proposed within the document.

1. Definition of Emergency Management Community

As the EM community receives different and preferential treatment from NWS within these (and perhaps other) policies, the specific definition of the EM community is critical to successful collaboration within the Weather Enterprise that ensures all end users and user communities receive the products and services they need, when they need them, and from sources most able within our form of government and private sector to make the critical weather related decisions that achieve the joint mission.

Even with the updates made in this version of the SDD document, we believe additional clarity is needed relative to the definition of the EM community as it relates to private, profit, and non-profit, entities specifically mentioned in the definition: “Other members of this community include: safety and emergency personnel, from universities or other large entities with large populations whose roles are functionally equivalent to the public safety officials.”

The SDD relies upon previously issued documents for its definitions of the EM community. Specifically, the revised SDD references the National Weather Service definition of “core partners” from Appendix A of NWS Directive NWSI 1-1003 as well as the FEMA National Response Framework Emergency Support Function as the basis for the definition of the EM community.

Given that this language is from the definition of “core partners”, we would recommend that the definition of “core partners” in NWSI 1-1003 should be revised in order to add additional refinement and clarity about the NWS role in serving private, profit and non-profit entities with IDSS.

Alternatively, the NWS could utilize a different, more refined definition of its core partners in this document than appears in NWSI 1-1003 as a part of the process of ensuring the most clear and appropriate definition of IDSS available for members of the EM community.

The concern is very intense around the words “safety and emergency personnel, *from* universities or other large entities with large populations whose roles are functionally equivalent to the public safety officials.” This is viewed as an open door to define every significant sporting event, college or university, amusement park, and similar circumstances which are both events or just private location and operations who may create a job description for someone that sounds similar to a legitimate government emergency manager, as being within the specific purview of all of the defined services of any type and level. And even many “state” operations like “state universities” are government-related in name only. For example, Penn State receives about 6% of its budget from state appropriations and is run by an independent board over which the state has no control. It operates major sporting events frequently. This is true of hundreds of universities through the country. Walt Disney World has an entire emergency management operations center for essentially management of its Florida parks and residential areas. Both of these institutions (and thousands more) are served by AWCI.

2. The need for consistent procedures to be defined and followed in any situation where there is an intersection of a private sector user community and the EM community receiving IDSS from the National Weather Service

It is helpful that the revised SDD provides several descriptive example scenarios of IDSS proposed by the NWS in order to showcase how the proposed policies in the SDD would be applied to actual situations. One such example, Scenario 2a (Significant Winter Storm) describes a situation where representatives from outside of the EM community, including some private sector businesses (electricity and cellular phone providers, DOT officials and a private contractor responsible for clearing the roads) are activated to the State Emergency Operations Center. In this situation, the NWS Emergency Response Specialist would be primarily interacting with the Incident Commander at the State EOC but representatives from the other entities could be in a position to monitor briefings provided by the NWS. The example clearly showcases that the support provided by the NWS will strictly be related to the provision of information to “support the aggregate life-safety preparation and response” and not for tailored and specific products to assist these other entities with preparation, response or optimization of their network or infrastructure. It is pointed out that the NWS ERS would refer companies to partners in AWCI for that level of support.

This is a key point that needs to be stressed and integrated into all examples and proposed procedures within the document. *Whenever there is an intersection of a private sector user community and community being supported by the NWS within the context of Enhanced Impact Decision Support (IDSS), the exclusive role of the NWS IDSS in supporting life-safety preparation and response should be delineated and instructions for engaging AWCI should be provided for any other tailored products and services specific to the needs of the other organizations.*

If this same framework is not integrated into all areas of the document, private user communities

may be lulled into a false sense of security that they could get all critical and required services by way of the NWS, which is not the intent of the NWS policy.

References to AWCI services in a proactive manner should be made and strengthened in all of the examples in order to add more clarity to the delineation between life-saving information furnished by the NWS in collaboration with the EM community and the wide variety of tailored, specific and critical services offered to all of these industries by AWCI.

3. Consistent reference to America’s Weather and Climate Industry (AWCI) and services provided by AWCI

References to AWCI and the critical products and services offered by AWCI have strengthened the proposed SDD and highlighted the important partnership between AWCI and NWS in ensuring the safety of all Americans.

Although there are several examples where AWCI is referenced directly, there are many cases where AWCI is referenced in the SDD and Descriptive Examples by way of several alternate terms such as “weather industry”, “private weather services”, “private sector weather services”, “weather service provider” etc.

In order to ensure the clarity and understanding, all of these references should be consistently listed as America’s Weather and Climate Industry (AWCI).

4. Process for Approval and Provisioning of IDSS Services

A consistent and transparent process is needed in order to approve new users for IDSS services and also continue previously established IDSS relationships that NWS local and regional offices, as well as the relationships National Centers, may have with end users within the EM community.

From an approval standpoint, it is noted that since *any organization* may request Tier 1 IDSS by “describing how they meet the criteria above for membership in the EM community or government core partners” – a wide variety of organizations and user communities may in practice request Tier 1 IDSS. The NWS should provide clarity to AWCI about the specific process that will be used to evaluate these requests within the framework set by the proposed SDD. In addition, for situations where the organization providing the request is outside of the scope of “public safety officials at the federal, state, local, tribal or territorial level who are charged with protecting the public from hazards that are influenced by weather or weather related events”, AWCI should have the ability to comment or provide feedback into the development of special criteria for these organizations and the decision as to whether the organization actually qualifies for Tier 1 IDSS services from the NWS. There are likely many ways this could be accomplished that would not hamper and could enhance the process of validating existing relationships and enrolling new organizations who legitimately need Tier 1 IDSS.

In addition, with regard to the provision of Tier 2 IDSS, the SDD states that “When offering Tier 2 IDSS, NWS will consider requests from authorized Tier 1 IDSS participants for expanded participation to be authoritative”. As previously pointed out, this statement lacks the appropriate level of transparency and rigor. All such requests from Tier 1 IDSS participants should be centrally collected and made available to AWCI for feedback, review and comment.

Section D on page 7 of the revised SDD states that “Each NWS office will maintain a record of organizations afforded Tier 1 decision support services for the EM community and government

core partners.” This record-keeping mandate will be helpful and it should be expanded to include Tier 2 support services. In addition, such records from individual NWS offices should also be collected at the national level and made available to interested parties for review upon request. It will be difficult for AWCI to routinely request such information from all NWS locations and central collection will also aid NWS in assuring central review and consistency throughout the nation and a central place for AWCI and NWS to discuss issues.

5. Provisioning of products used for IDSS

The clarifications provided within this draft of the SDD were helpful in terms of understanding how new services and existing capabilities already available to the entire Weather Enterprise would be used by the NWS in order to provide IDSS.

However, there is a distinction in this version of the SDD of “perishable” products, defined as “specialized products specific to the event and its response”. The SDD goes on to say “These products (not available to the general public) organize existing information available from NOAA in a manner to make it more directly and efficiently useful to EOC staff in developing recovery strategies, facilitating search and rescue efforts and identifying hazards to navigation”. The SDD goes on to state that these products would not be subjected to the typical NWS new/experimental product process due to time constraints but if the product is effective, similar products could be made available in the future, following the standard comment/review process which is used to govern the development of new and enhanced products and services.

The process is understandable but it is too narrow a focus to suggest these types of products to be provided only to Incident Commanders or an EOC. These “perishable” products should also be made available via standard web URLs to AWCI in order to assist AWCI in providing products and services in support of AWCI’s customer base who may be engaged on the same incident or conducting operations in the same area as an ongoing incident. Although the products could be valid only for a fixed amount of time, they still have value to AWCI and their user base and based on the partnership to deliver products to the entire scope of end users in all circumstances, these types of products need to be made available to AWCI at the same time they are made available to Incident Commanders and other recipients of IDSS related to a specific event. Providing these types of products to AWCI would also address a transparency issue in the sense that the NWS should not be providing “private” or “secret” forecasts/products to specific EM community members, which are not accessible to the wider Weather Enterprise.

6. Additional Clarity Needed on Emergency Conditions Provisions

The conditions listed under section F. Emergency Conditions are very broad and if not executed in a coordinated manner within the Weather Enterprise, could have the net effect of creating confusion or a delayed response as opposed to an immediate response to save lives and protect property - the goal of the National Weather Service, America’s Weather and Climate Industry and indeed the collective goal of the entire Weather Enterprise.

No descriptive example scenarios have been provided to cover the immediate provision of IDSS to individuals or organizations contemplated in section F of the document. Several examples should be included in the SDD so that the entire community can have more clarity on the types of situations where the NWS would have situational awareness of an immediate threat to life and property and proactively take action to provide IDSS (beyond the scope of already available foundational weather products, such as government weather warnings) to specific organizations and individuals.

As a Weather Enterprise, we need to determine how the NWS would most effectively provide this type of IDSS in a way that ensures a complete understanding of the weather hazard and initiates the appropriate response.

For example, a particular organization may already be receiving products and services from AWCI and based on those services, may have already initiated a response to a weather hazard prior to being proactively contacted (without having made a request for contact) by the NWS. Having a conversation with NWS staff may delay the response that has already been initiated or cause additional confusion about the response that should be already occurring. Therefore, this contact on the part of the NWS – though well intentioned, may have a negative and unexpected outcome on the overall efficiency or outcome of the actual response to the hazardous weather emergency.

It is also not clear based on the SDD what type of individuals or organizations would be able to receive these types of proactive IDSS in an emergency situation.

This type of process could also be dangerous in the sense that individuals or organizations may be lulled into a false sense of security that the NWS will “always be watching their events or locations” for severe weather threats, far beyond the delivery of standard NWS products, which is not appropriate and not scalable. In this way, an end user may spend less time on planning related to extreme weather threats and not recognize the steps they should take in advance to maintain awareness of dangerous weather and factor that and the assistance that AWCI can provide, into their plans.

If this type of notification is to occur, the SDD should describe a process by which the NWS should maintain detailed records which should be made available to anyone who is interested in them showing the date/time of the notification, the name of the organization contacted and the conditions surrounding the notification in the national registry suggested above.

7. Conclusion/Next Steps

We thank you for the opportunity to review and comment upon this revised document and for the thoughtful consideration of previous comments and suggestions on this topic.

We look forward to a continuing dialog with the National Weather Service in order to further enhance the document and would make ourselves available at any time to discuss any aspect of the document or our comments in more detail.

END