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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

_____)
In the Matter of:)
)
Framework for Next Generation 911 Deployment) PS Docket No. 10-255
)
_____)

COMMENTS OF SAMUELSON-GLUSHKO TECHNOLOGY LAW AND POLICY CLINIC,
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INTRODUCTION

I appreciate the opportunity to submit these comments to the Federal Communications Commission (“FCC”) regarding social media for emergency communications, in response to the Notice of Inquiry released December 21, 2010. I am a student attorney in the Samuelson-Glushko Technology Law & Policy Clinic at the University of Colorado Law School in Boulder, Colorado.

The FCC is performing a critical role in emergency communication in addressing next generation issues. The FCC should provide guidance to jurisdictions that wish to employ social media tools during a crisis. Moreover, as the FCC considers social media issues, it should be mindful of the opportunities that social media presents for communication during a crisis. Embracing new media tools can serve to increase information dissemination, dynamically mobilize resources, facilitate interaction, and help communicate information to narrowly tailored audiences. Although there are challenges associated with adopting new forms of communication, thorough risk assessment and guidance from the FCC will assist in this transition.

In the fall of 2010, I conducted a study on the use of social media to communicate with the public during the September 6, 2010 Boulder wildfire that occurred in the Fourmile Canyon Forest in Colorado. The fire burned 6,385 acres and is considered to be the worst fire in the history of Colorado. Social media played a critical role in helping to inform the public and the community came together in innovative ways to use social media to help mobilize people, organize aid, and disseminate information. During this study, I conducted five in-person interviews. All of the interviewees were public officials or local community leaders who were responsible for communicating public information

during the Boulder Fire. The use of social media during the Boulder Fire is a prime example of the way in which state and local public safety jurisdictions may employ social media tools as a way to communicate with the public during a disaster.

This Comment is in direct response to the FCC Notice of Inquiry, which raises the following three questions:

1. How have consumers used social media to report an emergency or contact public safety during an emergency?
2. How will consumers expect to use social media for emergency purposes in the future?
3. To what extent might state and local public safety jurisdictions employ social media tools as a way to interact with the public?¹

I. HOW HAVE CONSUMERS USED SOCIAL MEDIA TO REPORT AN EMERGENCY OR CONTACT PUBLIC SAFETY DURING AN EMERGENCY?

Social media has tremendous capacity to improve emergency response. As members of the public expand their ability to access information available through social networks, consumers increasingly look to social media to communicate during a crisis. Examples from across the globe demonstrate growing social media reliance as platforms such as Facebook and Twitter are forever changing the way people communicate during a crisis. In Adelaide, Australia, for example, two girls lost in a stormwater drain updated their Facebook status instead of calling 000, the Australian version of 911.² In a similar occurrence, a councilman in Atlanta Georgia Tweeted: “Need a paramedic on corner of

¹ Federal Communications Commission, Notice of Inquiry, Framework for Next Generation 911 Deployment, PS Docket No. 10-255, Paragraph 59.

² Pete Cashmore, “Trapped Girls Updated Facebook Status Instead of Calling for Help,” *Mashable*, September 7, 2009, available at: <http://mashable.com/2009/09/07/trapped-girls-facebook/> (last accessed March 12, 2011).

John Wesley Dobbs and Jackson st. Woman on the ground unconscious. Pls ReTweet.”³
He chose Twitter to communication because he was concerned his cell phone battery was too low to wait for a connection with 911.

In view of changing forms of communication, “traditional” 911 has initiated efforts to embrace richer communication tools including pictures and text. The City of New York has announced that 911 callers can now send pictures and video messages to authorities.⁴ This development could aid the identification of perpetrators. Nashville, Tennessee, has plans to go digital next year to help response time, however, it acknowledges potential complications and asks those in need to still dial 911 to seek help.⁵ Tennessee’s Emergency Management Agency’s Jeremy Heidt stated, “We are still at the infancy of social media. We haven’t decided on standards, what’s appropriate, what’s not, how to monitor it, who has to monitor it. You may send a message with your phone and think it went through and it doesn’t. Then you’re thinking you have actually asked for help, and you haven’t or no one knows that you’ve asked for help.”⁶

Although there are notable risks of using social media in place of traditional methods of communication, consumers are turning to social media as a way to connect during an emergency and public safety personnel must be ready to respond to these shifting expectations.

³ *Id.*

⁴ Ed Oswald, “NYC 911 callers can now send video, pictures,” *Betanews*, September 10, 2008, available at: <http://www.betanews.com/article/NYC-911-callers-can-now-send-video-pictures/1221075232> (last accessed March 12, 2011).

⁵ Dennis Ferrier, “Calling 911 Still Best Way to Get Help: Emergency Responders Try To Figure How Social Media Can Help,” *WSMV*, September 10, 2010, available at: <http://www.wsmv.com/news/24960344/detail.html>, (last accessed March 12, 2011).

⁶ *Id.*

II. HOW WILL CONSUMERS EXPECT TO USE SOCIAL MEDIA FOR EMERGENCY PURPOSES IN THE FUTURE?

In the fall of 2010, I interviewed public safety officials and emergency management personnel who were involved in using social media tools to connect with the public during the September 6 Boulder Wildfire. This study illuminated the changing expectations of individuals during a crisis. Over 200 structures were affected and 169 homes were burned down.⁷ Over 800 firefighters were employed to get the fire under control and it took eleven days until 100% containment was achieved.⁸ As social media use increases among the general population, broad press releases directed at mass audiences will no longer satisfy the needs of people accustomed to specifically tailored instant information. Three dimensions of changing consumer expectations emerged from the Boulder Fire experience. Future use of social media for emergency purposes will likely involve different platforms, require media monitoring, and demand increased interaction. Each of these are explained in turn.

First, the interviewees in the Boulder Fire study identified a common need to find the next platform and adjust quickly. While Facebook and Twitter are currently the primary vehicles of social media interaction, in the future it could be something completely different and it is important to remain flexible and engaged. Consumers will expect to see information instantly and automatic feeds that take

⁷ See Tery Spataro, "Community During Crisis: What Governments can Learn from the Boulder Community's usage of Social Media during the Boulder Fire," 2010, available at: <http://www.slideshare.net/BrandBehavior/orange-insights-teryspataroboulderfiresocialmediaanalysisemergencypreparednesscrowdsourcing> (last accessed March 12, 2011).

⁸ *Id.*

content posted from one site and replicate that post on Facebook and Twitter will be useful to communicate simultaneously through a number of different channels.

Second, for public safety officials connecting with the public through social media, media monitoring is going to play a key role in the future and the need for more bodies is evident to accommodate user expectations. For local governments, social media provides a great opportunity because a message can be communicated directly without needing to be filtered through another source. Media monitoring is critical because consumers will expect reliable information quickly. Balancing timely with accurate will be a major future concern because consumers of social media expect information to be delivered more rapidly than information that is delivered via traditional communication mechanisms.

Third, in addition to staffing positions to monitor questions and content, increased interaction is needed to meet new expectations. Social media brings unprecedented communication capabilities, an expansive audience, and the ability for instantaneous connections. Most people in the social media community are looking for more than automatic feeds. Instead of reverse-chronological automatic postings, live links and further engagement will be essential. Consumers want a sense of interaction with increased dialogue and back and forth communication. Instead of simply providing chronological posts, two-way communication can increase conversations and help include community members facilitate connections between those giving and getting help.

III. TO WHAT EXTENT MIGHT STATE AND LOCAL PUBLIC SAFETY JURISDICTIONS EMPLOY SOCIAL MEDIA TOOLS AS A WAY TO INTERACT WITH THE PUBLIC?

As social media becomes integrated with everyday aspects of Americans' lives, embracing tools like Facebook and Twitter will increase information dissemination at critical times. There are important advantages for state and local public safety jurisdictions that are prepared to embrace social media as a strategy to communicate. Exploring creative and innovative approaches to communicating with the public during an emergency can lead to more accurate and timelier information dissemination.

During the Boulder Fire in 2010, emergency management personnel relied heavily on social media to communicate information to local residents. It is essential to provide accurate information that is not sensationalized. Bypassing traditional media outlets has the benefit of avoiding reports that tend toward headline-grabbing techniques. All interviewees reported the need for accuracy and the benefit of direct communication with the public.

There are important challenges and opportunities that come with the use of social media tools as a way to interact with the public.

a. Opportunities Created by Social Media Adoption by First Responders

The lessons learned from the Boulder Fire show that embracing social media will provide four principal opportunities for crisis communication. First, social media can dynamically mobilize resources by connecting an entire community with the power to expand in scale as a crisis grows. Second, social media provides interaction, facilitates conversation, public involvement and real-time assistance. Third, social media users can

personalize their accounts and quickly obtain information that is valuable to them. Fourth, social media audiences are more narrowly tailored than mass audiences receiving press releases. This creates efficiency and helps direct people to the information sources that meet their needs. Each opportunity is explained below.

i. Dynamically Mobilize Resources

Social media provides a means to mobilize people and aid in a crisis. Integrating social media into a disaster response provides connections to help within the community. Unlike a hospital or shelter, community assistance is elastic and has the capacity to expand with the severity of the crisis. For example, during the Boulder Fire, the Boulder Humane Society began to use their website as a mechanism to connect those giving aid with those in need because the facility had hit capacity.

ii. Interaction

Social media focuses on conversations and real-time interaction. During a disaster response, this allows public safety officials to give information quickly and also to receive it. Being able to listen to community members and their needs can be a tremendous benefit. Additionally, this allows community members to connect to offer aid. Facilitating collaboration and enhancing public participation helps emergency responders to tap members of the public to assist in relief efforts.

iii. Personalization

This feature of social media allows users to personalize their accounts and collect information that is valuable to them while ignoring the rest of the chatter. Public safety entities can choose to follow and connect with trusted community members and Local Governmental sources that are developing a voice during a particular disaster. This

allows public expertise to take on a primary role and promotes instant inter-agency communication.

In order to identify and rely on leaders in the community, public safety officials must be prepared to handle and respond to miscommunication. It is important to acknowledge risks and focus on ways to cope with challenges of misinformation thereby taking rational, proactive approach to crisis communication. Reliance on public knowledge and information dissemination should not be abandoned due to associated risks. Instead, actively addressing potential problems by utilizing community members can help deliver messages and offer solutions to mitigate these risks.

iv. Narrow Audience

Finally, social media audiences tend to be narrowly tailored compared to mass audiences of press releases and radio announcements. Rather than resorting to one call center or one isolated television broadcast, social media can provide extremely fast two-way communication. Creative use of social media helps to sort people who wish to find help for animals, with those looking for shelter, and those looking for food. Twitter and Facebook accounts can help to quickly direct people to information sources that are most valuable to them at that particular time. This provides organization and efficiency in the disaster response.

b. Challenges created by Social Media Adoption by First Responders

This future vision of embracing social media in emergency response comes with many challenges. Two immediate concerns are staffing and accuracy. As social media expectations grow, it will be critical to have enough people to supply an online presence

and interact in a two-way dialogue. Likewise, an important consideration is balancing timely information dissemination with the need for that information to be accurate and reliable.

i. Staffing

Social media is extremely time intensive and users of social media expect not just comments, but also interaction. An analysis of government Twitter accounts in San Francisco has revealed that more interactive sites also are more influential.⁹ The issue of staffing can be problematic because embracing social media requires constant monitoring and response. Public Affairs director for Fairfax County, VA, Merni Fitzgerald, noted that her county's 9-1-1 system operates 24 hours a day, seven days a week, but no one is monitoring social media around the clock.¹⁰ Staffing to monitor social media channels during crisis response is not only a need that will increase with future development, but also it is a need that must be addressed immediately. People rely on social media more everyday and increasingly expect listening, response, monitoring, and engagement. Connecting with external resources can facilitate the use of community members in the aid process.

ii. Balancing Timely with Accurate

As standards and practices change, disseminating news through social media will increasingly become the norm. However, the Boulder Fire interviewees noted standards of reporting are not consistent across print media and online forums. Panic can arise as a

⁹ Adriel Hampton, "On Twitter, Engagement Equals Influence for Gov't Accounts," *OpenSF*, September 12, 2010, available at: <http://opensf.wordpress.com/2010/09/12/on-twitter-engagement-equals-influence-for-govt-accounts/>, (last accessed March 12, 2011).

¹⁰ Maddie Grant, "Preparing for the Next Disaster: The Future of #crisisdata," *SocialFish*, October 21, 2010, available at: <http://www.socialfish.org/2010/10/preparing-for-the-next-disaster-the-future-of-crisisdata.html>, (last accessed March 12, 2011).

result of inaccurate information. Social media emphasizes speed and immediacy but public safety personnel embracing social media must emphasize accuracy as a paramount concern. Balancing these two interests as priorities and needs shift in the Internet context will become increasingly complex. All of the interviewees pointed out the ability for social media arenas to self-police and censor inaccuracies. Public safety jurisdictions need to be cautious to maintain credibility while simultaneously providing timely data. For example, a tweet from a community member that included a photo of the first night of the Boulder Fire caused panic and alarm because the image showed the fire burning at its highest point. This image however was tweeted 3 days after the photo was taken and the fire had substantially died down. In addition to accuracy, public safety personnel must also be aware of the need for timely information. Waiting too long to provide information without context can be problematic.

Overall, social media seems to be most beneficial when embraced as an additional tool and not a replacement technique. Relying too heavily on social media during a period of emergency can be problematic in case of a power outage or Internet failure. Additionally, social media may automatically exclude certain populations like the elderly or low-income communities.

In the midst of tragedy, social tools can be utilized to save lives. Embracing social networks expands the universe of people providing aid and encourages connections between those in need and those prepared to give aid. Giving the public a heightened role in disaster response empowers individuals from around the world to offer assistance. As a disaster response grows in scope, utilizing social media resources can help bring in aid from bystanders, community members, and volunteers from around the globe.

CONCLUSION

While there are notable challenges associated with adopting social media tools, the benefits outweigh the risks. A thorough analysis of perceived risks can help mitigate fears and encourage effective communication. In light of the lessons learned from the Boulder Fire, I urge the FCC to encourage social media use as part of emergency response and accordingly provide guidance to jurisdictions that wish to take advantage of the marked benefits of adopting new media as part of a crisis response.

Sincerely,

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