



21 November 2025

Marc Morin
Secretary General
CRTC
Ottawa, ON K1A 0N2

Filed online

Dear Secretary General,

Re: *Call for comments – Improving the public alerting system, [Telecom and Broadcasting Notice of Consultation CRTC 2025-180](#) (Gatineau, 15 July 2025); Call for comments – Improving the public alerting system – Changes to procedure, [Telecom and Broadcasting Notice of Consultation 2025-180](#) (Gatineau, 10 October 2025) – Intervention by FRPC*

The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including telecommunications. The Forum supports a strong Canadian communications system that serves the public interest.

FRPC welcomes the CRTC's decisions to invite public comment on improving its 2014 policy on emergency alerting, to enable the CRTC and government to develop and implement a 21st century National Public Alerting System for Canada's communications systems.

That said, the Forum considers that the CRTC's decision not to hold an appearing public hearing in this matter limits the public's ability to engage with the CRTC regarding this important matter. FRPC is also concerned that the only evidence placed on the record by the Commission as of 19 November 2025 consists of a survey regarding accessibility undertaken on behalf of Accessible Standards Canada. At a minimum, the CRTC should have provided Canadians and interested parties with the results of its own research, if any, regarding emergency alerting.

Sincerely yours,

Monica L. Auer, M.A., LL.M. execdir@frpc.net
Executive Director
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Ottawa, Ontario



**No promises are better than empty promises:
Canada Needs a 21st Century
National Public Alerting System
Before the 22nd Century**

Monica Auer

Executive Director

Forum for Research and Policy in Communications (FRPC)

21 November 2025



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Terminology

Term	Description
2014-444	<i>Amendments to various regulations, the standard conditions of licence for video-on-demand undertakings and certain exemption orders - Provisions requiring the mandatory distribution of emergency alert messages, CRTC Broadcasting Regulatory Policy CRTC 2014-444 (Ottawa, 29 August 2014)</i>
ACA	All-Channel Alert
Alert	Broadcasting proposal submitted by Pelmorex to the CRTC in 2005 “An alert can be broadcast and wireless intrusive, meaning that the messaging is accompanied by a distinct tone on wireless devices and interrupts television and radio broadcasting. The broadcast and wireless intrusive criteria are determined by the event severity, urgency and certainty values. If the broadcast intrusive criteria are met, the user will be notified on the interface while creating the alert.” ¹
ALERT READY Broadcasters	Brand name for Canada’s National Public Alerting System Under the 2023 <i>Broadcasting Act</i> broadcast undertakings include (and are therefore not limited to) distribution, online, programming and network undertakings (s. 2(1))
CanOps	Canadian Public Safety Operations Organization Known as CAPAN until 30 September 2014
CAP	Common Alerting Protocol “The international message protocol adopted for use in NPAS. It is an international standard managed by OASIS, the Organization for the Advancement of Structured Information Standards.” “open, non-proprietary digital message format for all types of emergency alerts and notifications over all kinds of networks. The CAP specification is owned by OASIS.” ² NPAS CLF Guidance v2.0, p. 5
CAP-CP	Common Alerting Protocol – Canadian Profiles “This profile defines a set of rules, and managed lists of values, that are recommended for use in Canada within public alerting systems.” ³
CAPAN	Canadian Association for Public Alerting and Notification Became the Canadian Public Safety Operations Organizations (CanOps) in September 2014 ⁴
CLF	Common Look and Feel of public alerts ⁵
CRTC	Canadian Radio-television and Telecommunications Commission Established by Parliament as the Canadian Radio and Television Commission in 1968; title (but not acronym) amended in 1976 to current name
DRR	Disaster Risk Reduction , “defined by the United Nations (UN) as “systematic efforts to analyze and reduce the causal factors of disasters. Reducing exposure to hazards, lessening vulnerability of people and property, wise management of land and the environment, and improving preparedness and early warning for adverse events are examples of DRR” ⁶
EMOs	Emergency management organizations whose “activities include planning and research, training, response operations and the administration and delivery of disaster financial assistance programs. EMOs are most familiar with the natural hazards and other risks of your region. Learn more from the EMO in your province or territory.” ⁷

¶: paragraph

¶¶: paragraphs



Term	Description
EU-Alert	European Union's Public Warning Service using Cell Broadcast technology
LMD	Last mile distributor "A party that presents audience alert messages to the public through one or more media (e.g. radio, television, search engine provider, SMS text message service, push notification on mobile devices connected to wireless networks, etc.)." ⁸
NAAD	National Alert Aggregation and Dissemination System – proprietary system designed, built and owned by Pelmorex, ⁹ used to disseminate messages announcing danger to life or property (<i>Broadcasting Distribution Regulations</i> , s. 7.2(1))
NPAS	National Public Alerting System "a collaborative initiative between Federal-Provincial-Territorial (FPT) governments that provides emergency management organizations across the country with the capability to rapidly warn the public of imminent or unfolding hazards to life. The NPAS complements existing public alerting systems and tools in a number of FPT jurisdictions." ¹⁰
OASIS	Organization for the Advancement of Structured Information Standards Owns, administers and manages the Canadian Profile of the Common Alerting Protocol (CAP), based in Woburn, Massachusetts, United States of America
OLMCs	Official-language minority communities
PERS	Public Emergency Reporting Service – 9-1-1
PSAPs	Public Safety Answering Points
WEA	United States' Wireless Emergency Alerts standard, in use since 2012



Useful links

Public Safety Canada:
Emergency management in
Canada

<https://www.publicsafety.gc.ca/cnt/mrgnc-mngmnt/index-en.aspx>

<https://www.publicsafety.gc.ca/cnt/mrgnc-mngmnt/mrgnc-prprdss/capcp/index-en.aspx>

Canadian Profile of the Common Alerting Protocol
CAP-CP, Version 1.0

[Common Look and Feel Guidance, Version 2.0](#)

Information about the National
Alert Aggregation and
Dissemination System

<https://alerts.pelmorex.com>

Resources

Resources for Last Mile Distributors

NAAD system Governance Council Update (summary for LMD)

Policies and guidelines

Wireless Public Alerting

NAAD System Tests Schedule

Contact us

“[Click here](#) to register and receive technical updates and bulletins.

“If you have question or suggestions regarding this website or the
NAAD System in general, please refer to the [FAQ](#) or contact us :”

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National Public Alerting System:
News

<https://npas.ca/category/news/>

Alert Ready tests – survey results (16 November 2022, 4 May 2022, 17
November 2021, 5 May 2021, 28 November 2019)

CLF Version 2.0 Approved (29 March 2018)

Alert Ready

<https://www.alertready.ca>

To contact us or to get answers to frequently asked questions, click here

Check Your Phone’s Compatibility

What is Alert Ready?

Alert Tone

Notice for people who are deaf, hard of hearing, blind or partially sighted

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Information from the CRTC

<https://applications.crtc.gc.ca/recherche-search/eng/home/search?q=naad&activepage=1>

<https://applications.crtc.gc.ca/recherche-search/fra/accueil/recherche>

Archived Public Safety Messages

<https://alertsarchive.pelmorex.com/en.php>

Daily Archived Public Safety Messages

Monthly Archived Public Safety Messages



Summary

ES 1 On 15 July 2025 the CRTC announced that it was considering modest changes to its existing approach to emergency alerting in Canada. In other words, the CRTC is not actually reviewing the performance of Canada’s electronic alerting system, but is tinkering modestly at the edges.

Background

ES 2 The National Public Alerting System consists of alert issuers, the NAAD System, last-mile distributors – broadcasters and wireless service providers – and the public. The NPAS enables federal, provincial and territorial emergency management organizations to warn people quickly about imminent threats to life or property.

ES 3 Parliament delegated its authority to regulate broadcasting and telecommunications (including eventually wireless service providers and the Internet) to the CRTC in 1968 and 1975, respectively.

ES 4 The CRTC first began to regulate broadcast emergency alert messages in the late 1990s using a voluntary approach. Broadcasting distribution undertakings (BDUs) could include messages about unfolding dangers to life or property in the programming of the audiovisual services they carried, if the services agreed.

ES 5 The CRTC’s voluntary approach to broadcast emergency alert messages lasted 17 years. During this period the Commission in 2009 granted mandatory BDU carriage to Pelmorex Communications Inc.’s The Weather Network/MétéoMédia – a discretionary television service first licensed in 1987 to provide live information about local, regional and national weather in both official languages. In exchange for regulated subscriber revenues, Pelmorex committed to aggregate and to distribute emergency alert messages free of charge to BDUs using non-proprietary technology known as the National Alert Aggregation and Dissemination System (NAAD System) and to establish an oversight mechanism subsequently known as the Alerting Governance Council. BDUs’ participation in the NAAD System remained voluntary.

ES 6 The CRTC made the distribution of broadcast emergency alert messages mandatory for radio, television and BDUs in 2014 after finding that few broadcasters were voluntarily distributing these messages. The CRTC changed its regulations to require radio stations, TV stations and BDUs – ‘last-mile distributors’ – to distribute emergency alerts authenticated by and received from the NAAD System if the alerts related to threats to life.

- ES 7 The funding and staffing of the NAAD System are currently provided by Pelmorex in exchange for BDUs' mandatory carriage of The Weather Network/MétéoMédia. In 2018, the System operated with 6 full-time and 3 part-time staff, expending \$2.3 million for its operations (the equivalent of \$0.018 cents per BDU subscriber per month in 2018).
- ES 8 For the past nine years the CRTC has said it would monitor Canadian broadcasters' participation in NPAS or collaborate with (unidentified) public and private partners to improve the system. The Commission has not published results of its monitoring of broadcasters' NPAS participation or results of any public-private collaborations to improve NPAS.
- ES 9 Little is known about which broadcasters actually distribute emergency alert messages. The CRTC's website offers an interactive map, but not a list, of last-mile distributors. The second-by-second monthly programming logs of Canada's television stations published by the CRTC on Open Data do not include codes to identify emergency alerts that they broadcast, emergency bulletins or other information programming offered during times of crisis. The Commission does not publish radio stations' monthly programming logs, does not require stations to identify hours of news that they broadcast and does not require their logs to identify emergency alerts or emergency news bulletins that they broadcast.
- ES 10 The Commission has recently begun to require telecommunications service providers to submit reports if they incur service outages – similar reports are not required for broadcasters.
- ES 11 In 2023 the *Online Streaming Act* made significant changes to the *Broadcasting Act*. Among other things Parliament explicitly empowered the CRTC to regulate the carriage of emergency alerts and to regulate online broadcasting. It also requires the Commission to gather information to test its policies with respect to official language minority communities.
- ES 12 The Forum has set out a number of concerns about the lack of evidence made available either at all, or on a timely basis, and regarding the CRTC's current approach to [CRTC Conversations](#), that appears to allow a third company, based in Washington, to collect private information about those registered to submit non-party comments.
- ES 13 FRPC has also analysed the alerts distributed via broadcasting or wireless services, and notes that more than half of the emergency alerts distributed in this manner were distributed only by wireless services.
- ES 14 Broadcasting – whether audio or audiovisual – remains very popular in Canada.



ES 15 The CRTC should ensure that all broadcast media distributing programming in Canada to people in Canada ensure that emergency alerts are available when required.

ES 16 FRPC's recommendations at this time are set out below; we have also responded to a number of the CRTC's questions.

Recommendation 1	The CRTC should publish any evidence it has regarding broadcast emergency alerts and OLMCs, or confirmation that it does not as of 21 November 2025 have such evidence, before the 19 December 2025 deadline for replies	6
Recommendation 2	The CRTC should e-mail all parties that intervened about the publication of any new evidence regarding OLMCs and broadcast emergency alerts	6
Recommendation 3	The CRTC should revise its Rules of Practice and Procedure to clarify timeframes for the CRTC's posting and determination of procedural requests	8
Recommendation 4	In early 2026 the CRTC should schedule a consultation and public hearing to consider updates to its Rules of Practice and Procedure	8
Recommendation 5	The CRTC must review its practices regarding the disclosure of relevant evidence that it has, to provide clear descriptions of and links to this evidence in its notices of consultation	15
Recommendation 6	The CRTC should ensure that its consultations include references to its previous determinations regarding the areas canvassed by the notices of consultation	16
Recommendation 7	The CRTC should ensure that its consultations include links to the most recent empirical and survey research it has undertaken concerning the matters raised in the consultations	17
Recommendation 8	The CRTC should amend its Rules of Practice and Procedure to address the rights and responsibilities of all participants with respect to comments filed through CRTC Conversations	20
Recommendation 9	The CRTC should immediately require Granicus to change the Terms of Use to prohibit the company from retaining any personal information about CRTC Conversations registrants	22



I Telecom and Broadcasting Notice of Consultation 2025-180

- 1 The Forum for Research and Policy in Communications (FRPC) is a non-profit and non-partisan organization established in 2013 to undertake research and policy analysis about communications, including telecommunications.
- 2 The Forum supports a strong Canadian communications system that serves the public interest. **The most important of the CRTC's responsibilities is ensuring that Canada's communications system is able to and does warn Canadians of serious, imminent threats to their security.**
- 3 The Forum's comments regarding Telecom and Broadcasting Notice of Consultation 2025-180 follow. We begin in the remainder of this section by explaining FRPC's interest in this proceeding and by describing our understanding of its purpose. Part II sets out the Forum's serious concerns about irregularities in this proceeding. The current legislative requirements for emergency alerting are addressed in Part III and Part IV sets out FRPC's responses to questions posed by the CRTC in 2025-180.

A *FRPC's March 2024 application regarding the CRTC's approach to broadcast alerts*

- 1 **CRTC's Plans regarding emergency alerting**
- 4 The CRTC's 8 May 2023 *Regulatory Plan to modernize Canada's broadcasting system* and its 21 March 2024 *Regulatory Plan to modernize Canada's broadcasting framework* each stated that it might hold a public consultation "on protecting Canadian consumers" in Winter 2023-2024.
- 5 Both of the CRTC *Plans* described the consultation as a review of "ways to protect consumers and include broadcaster codes of conduct and mechanisms for complaints". Neither discussed a review of the CRTC's (first) regulatory policy regarding the distribution of emergency alert messages: [Broadcasting Regulatory Policy CRTC 2014-444](#).
- 2 **Request that the CRTC review and update BRP CRTC 2014-444**
- 6 Given FRPC's position regarding the importance of alerting Canadians to imminent threats, the fact that the CRTC had last reviewed its approach to broadcast emergency alerts in 2014, and the rise of global tensions and life-threatening weather-related events, FRPC submitted a Part 1 application to the CRTC on 28 March 2024 asking it to review the 2014 policy for broadcast emergency alerts.

- 7 After summarizing available facts about broadcast emergency alerting, the Forum asked the CRTC to initiate a public consultation to review this policy, and to include a public hearing to allow people and organizations affected by emergencies to engage with CRTC Commissioners, face to face.¹¹
- 8 The CRTC's staff assigned a number to FRPC's broadcast emergency alerts application in mid-April 2024 (**Error! Reference source not found.**). While section 21(1) of the current *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* states that it "must post a notice of consultation on its website" when, as with FRPC's application, it meets the seven requirements of subsection 21(2), the CRTC did not post FRPC's application.
- 9 In mid-June 2024 the CRTC's staff said it would not treat FRPC's "letter" as a Part 1 application because it asked for a proceeding rather than "any other specific regulatory measures" (Appendix 2); separately the Commission staff sent an e-mail stating that FRPC's "application is now considered closed" (Appendix 3).
- 10 Canada's courts established 25 years ago that decisions of the CRTC staff are not decisions of the Commission: *Centre For Research-Action On Race Relations v. Canadian Radio-Television and Telecommunications Commission*, [2000 CanLII 16685 \(FCA\)](#), at ¶16;¹ *Violator no. 10 v. Canada (Attorney General)*, [2018 FCA 150 \(CanLII\)](#), at ¶¶41-43. On 29 July 2024, therefore, FRPC asked the CRTC to provide and publish its reasons for denying process to FRPC's application: Appendix 4.
- 11 On 9 October 2024 a majority of the Commission concluded that FRPC's application that the CRTC review its 2014 broadcast emergency alerts policy was not an application because FRPC's request "should be viewed as a request to initiate a broad proceeding on a wide range of policy matters rather than an application": Appendix 4.
- 12 The CRTC added that "[a] notice of consultation on public alerting is among the CRTC's planned consultations for this winter" – winter being defined by [Environment Canada](#) as December, January and February. Indeed, the CRTC *Consumer Protections Action Plan* modified on 20 December 2024² highlighted a consultation on the National Public Alerting System:

Helping ensure reliable networks
Canadians need reliable, affordable, and high-quality Internet and cellphone services for every part of their daily lives. The CRTC is addressing the reliability of all telecommunications services, including emergency and accessibility services.

¹ Similarly, decisions of individual CRTC Commissioners are not decisions of the Commission: *Communications, Energy and Paperworkers Union of Canada v. CanWest MediaWorks Inc.*, [2008 FCA 247](#) (CanLII).

² The CRTC does not retain previous versions of its amended *Consumer Protections Action Plan* and its *Regulatory Plan to modernize Canada's broadcasting system* on its public website pages.

What we are doing

[Consultation on improving the National Public Alerting System \(NPAS\)](#)

This consultation will consider improving the accessibility of alerts for all Canadians, and helping ensure they are available across the country and in languages that reflect local communities.

Status: Planned for winter 2024

[Bold font in original text]

- 13 The Forum therefore welcomed the CRTC’s publication of 2025-180 in mid-summer 2025¹² and the Commission’s statement in 2025-180 that its “[c]urrent review”¹³ about this issue may result in an updated joint telecom- broadcast policy by 2026.
- 14 Although FRPC considered and considers that the CRTC should have amended the scope of this proceeding to review its overall approach to emergency alerting – so as to assist the federal government as it reviews Public Safety Canada’s revisions of its approach to its responsibilities – we note the CRTC’s staff’s 21 November 2025 “view that there is no need to change the scope, timeline or procedures of this proceeding”.¹⁴ That said, it the Commission’s decision on this matter remains unknown, as neither the 1991 nor the current *Broadcasting Act* explicitly empowered or empowers the Commission to delegate to its staff decisions about procedural requests directed to the Commission through its Secretary General (seer paragraph 10, above).

B Purpose of TBNOC 2025-180

- 15 In announcing 2025-180 on 15 July 2025 the CRTC stated that it “plays a supporting role within the NPAS by requiring cellphone service providers, cable and satellite television providers, as well as radio and television broadcasters, to distribute emergency alerts to the public. 2025-180 also stated that the consultation is “ is one step in the Commission’s ongoing work to help protect Canadians as part of its [Consumer Protections Action Plan](#)”.¹⁵ The CRTC Summary of 2025-180 states that the CRTC is

... seeking comments on certain aspects of the NPAS, including barriers to accessibility, the languages in which alerts are provided, issues affecting its availability nationwide, and possible measures the Commission could implement to monitor the system’s status more effectively.

- 16 The Notice of Consultation also makes several statements about the CRTC’s role in the NPAS:
- “to require cellphone service providers, cable and satellite television providers, as well as radio and television broadcasters, to distribute emergency alerts to the public” (¶16)
 - “helping ensure that Canadian telecommunications and broadcasting service providers distribute alerts to the public” (¶17)

- requiring last-mile distributors “to connect to the NPAS and relay these alerts the public” (¶14)
- “to relay visible public test alerts issued by EMOs (i.e., test alerts received by the public on radio, television, and mobile phones) twice per year, in May and November” (¶23)

17 2025-180 also states, though, that the CRTC is thinking about “targeted improvements to public alerting within its role in the NPAS” (¶8). The Commission’s notice states that it

... is seeking comments in the following areas to:

- review the accessibility of the system for persons with disabilities;
- facilitate the dissemination of alerts in both official languages;
- explore expanding the system to include Indigenous and additional languages;
- address potential wireless public alerting gaps across the country;
- review the existing public alerting test schedule; and
- determine improved methods by which the Commission can monitor and validate that LMDs are meeting their public alerting requirements.¹⁶

18 To put this another way, 2025-180 invites comments on the NPAS so that the CRTC can “review” the system’s accessibility, the public-alerting test schedule, gaps in the system’s reach across Canada and the dissemination of alerts in both official languages. 2025-180 also invites comments on two possible changes to the NPAS system: including Indigenous and other languages, and improving its monitoring of last-mile distributors’ public-alerting requirements.

II Ongoing problems with CRTC processes

19 In light of the importance of the telecommunications and broadcasting sectors to Canadians and Canada and the critical regulatory and supervisory responsibilities over these sectors which Parliament has delegated to the CRTC,¹⁷ the Forum has for several years been concerned about the CRTC’s implementation of its legislative and regulatory requirements.

20 The Forum is concerned that, despite the CRTC’s 20 December 2024 plan to hold a “Consultation on improving the national Public Alerting System” committing to undertake this review in

A 2025-180 contravenes OLMC requirements in Broadcasting Act

21 Parliament's *Broadcasting Act* emphasizes the importance of taking into account the concerns of Official Language Minority Communities (OLMCs).

22 While agreeing that the CRTC should regulate and supervise flexibly, it states clearly that the Commission's work should take into account "the specific needs and interests of official language minority communities in Canada and of Indigenous peoples" (subsection 5(2)(a)).

23 It requires the CRTC to "enhance the vitality" of OLMCs (subsection 5.1) – suggesting that the CRTC must ensure that, especially in the context of events that threaten lives or communities, unilingual members of OLMCs are able to receive emergency alerts in the official language they best understand (subsection 5.1).

24 And, Parliament not only requires the CRTC to "consult with official language minority communities in Canada when making decisions that could adversely affect them", it also requires the Commission to

(a) gather information to test its policies, decisions and initiatives;

...

(d) provide them with all relevant information on which those policies, decisions or initiatives are based;

(e) openly and meaningfully consider those opinions;

(g) provide the communities with feedback ... during the consultation process

25 The evidence set out in TBNOC 2025-180 consists of textual statements in the notice about the CRTC's current requirements and a listing of four "[r]elated documents":

Call for comments – Co-development of an Indigenous Broadcasting Policy, Broadcasting Notice of Consultation CRTC [2024-67](#), 22 March 2024

Distribution of emergency alert messages – Decommissioning of the Alberta Emergency Alerting System and transition to the National Alert Aggregation Dissemination System, Broadcasting Information Bulletin CRTC [2022-232](#), 29 August 2022

Senior Officials Responsible for Emergency Management – Application to modify the wireless public alerting visible test schedule, Telecom Decision CRTC [2019-239](#), 8 July 2019

Procedures for filing confidential information and requesting its disclosure in Commission proceedings, Broadcasting and Telecom Information Bulletin CRTC [2010-961](#), 23 December 2010; as amended by Broadcasting and Telecom Information Bulletin CRTC [2010-961-1](#), 26 October 2012

- 26 FRPC was unable to locate any information within 2025-180 that describes or relates to OLMCs and emergency alerting.

Recommendation 1 The CRTC should publish any evidence it has regarding broadcast emergency alerts and OLMCs, or confirmation that it does not as of 21 November 2025 have such evidence, before the 19 December 2025 deadline for replies

- 27 As an intervener, FRPC is a party in the TBNoC 2025-180 proceeding: Figure 1.¹⁸

Figure 1 CRTC's Rules - Definition of intervener and intervenant

Definitions

Definitions

1 The following definitions apply in these Rules.

document has the meaning assigned by the definition *record* in section 3 of the Access to Information Act. (*document*)

party means an applicant, respondent or intervener. (*partie*)

person has the same meaning as in subsection 2(1) of the Telecommunications Act. (*personne*)

respondent means a person that is adverse in interest to an applicant. (*intimé*)

Définitions

Définitions

1 Les définitions qui suivent s'appliquent aux présentes règles.

document S'entend au sens de l'article 3 de la Loi sur l'accès à l'information. (*document*)

intimé Toute personne dont les intérêts sont opposés à ceux du demandeur. (*respondent*)

partie Tout demandeur, intimé ou intervenant. (*party*)

personne S'entend au sens du paragraphe 2(1) de la Loi sur les télécommunications. (*person*)

Recommendation 2 The CRTC should e-mail all parties that intervened about the publication of any new evidence regarding OLMCs and broadcast emergency alerts

B Untimely delay in responding to procedural requests created uncertainty

- 28 On 5 November 2025 – the day after the government laid Budget 2025 before Parliament and 12 working days until the 21 November 2025 deadline for interventions – FRPC filed a procedural request. It pointed out that while 2025-180 proposes little more than a review of the NPAS, the Budget proposes changes to Public Safety and Emergency Preparedness that would “address inefficiencies and create space to strategically advance critical and emergencies priorities”: the Forum argued that Budget 2025 contemplates a ‘rethinking’ of Canada’s approach to emergencies, and that 2025-180 should be amended to
- add to the 2025-180 public record by setting out all studies, research or information that it has or that it has undertaken since it last reviewed the public alerting system in August 2014 ([Broadcasting Regulatory Policy CRTC 2014-444](#)), no later than 19 December 2025;
 - add a public hearing to the 2025-180 process – for the last week of January 2026 – to enable Canadians to set out their concerns about

Canada’s current public-alerting system and to express their needs for a 21st century alerting system to the CRTC hearing panel, and to permit emergency-management officials and others to answer the hearing panel’s questions;

- c. consider inviting participants to a preparatory conference before the hearing, to determine procedures and “any other matters that might aid in the simplification of the evidence” on the record: *Rules*, subsections 37(c), (d) and (f) – and if the CRTC schedules such a preparatory conference, asks that the Forum be invited to participate; and to
- d. extend the current deadlines to provide the public with the time needed to review the supplementary evidence made available by the CRTC, as follows:

	Current 2025-180 deadlines	Proposed 2025-180 deadlines
Interventions	21 November 2025	9 January 2026
Replies	19 December 2025	23 January 2026
Final submissions	28 January 2026	17 February 2026

- 29 FRPC’s 5 November 2025 procedural request was not added to the 2025-180 public record until after November 14, 2025.
- 30 The CRTC responded to the DWCC procedural request in eight business days; FRPC received a CRTC staff letter about its procedural request today, the deadline for interventions.
- 31 The CRTC’s 2010 *Rules* do not require the Commission to publish all procedural requests promptly, to respond to procedural requests or to respond to such requests within a specific number of business days. Nearly three years ago, however, the Ministers of Canadian Heritage and of Innovation, Science and Economic Development wrote the CRTC Chairperson about the Government’s “vision and priorities with respect to Canada’s broadcasting and telecommunications system”.
- 32 The Ministers’ letter of [3 February 2023](#) stated that the CRTC’s status as an “independent public authority that operates at arm’s length ensures that the Canadian communications system is supervised and regulated in an impartial manner by an expert body, which is essential to a free and democratic society”¹⁹ [underlining added].
- 33 The Ministers also pointed out that “[u]ndue delays create uncertainty” and that “timely decision-making will only be more critical in responding to the needs and expectations of society and industry.” FRPC notes, moreover, that different

response times to procedural requests suggest different rather than impartial treatment of parties by the CRTC.

- 34 The Ministers added that while the role of CRTC Chair “is vital in upholding public trust in the institution” of the CRTC, they sensed “that public confidence and trust in the CRTC has waned in recent years”, due to its “taking too long to make decisions” and to processes to which access “is unequal”.
- 35 From FRPC’s perspective, the ongoing and prolonged delays by the Commission³ in responding to procedural requests erode trust in the institution’s professionalism and ability to operate efficiently and create uncertainty for all participants: how does this benefit Canada’s communications systems or the Commission itself?
- 36 The CRTC must revise its *Rules* to assure participants of the regularity and predictability of its proceedings and to provide participants in its proceedings with greater certainty as to timing.

Recommendation 3 The CRTC should revise its *Rules of Practice and Procedure* to clarify timeframes for the CRTC’s posting and determination of procedural requests

- 37 The *Regulatory Plan to modernize Canada’s Broadcasting Framework* published by the CRTC on its public website (“external *Regulatory Plan*”) and dated 6 May 2024 included a “Consultation on the CRTC Rules of Practice and Procedure” in Spring 2026: [Appendix 5](#).
- 38 The Spring 2026 *Rules of Practice and Procedure* consultation remained in the CRTC’s external *Regulatory Plan* until 8 November 2024: [Appendix 6](#). The *Rules of Practice and Procedure* consultation vanished from the CRTC’s 15 November 2024 *Plan* ([Appendix 7](#)) and remains absent from the most recent version²⁰ of the *Plan* dated 18 November 2025: [Appendix 8](#). The CRTC should prioritize the update of its *Rules of Practice and Procedure*.

Recommendation 4 In early 2026 the CRTC should schedule a consultation and public hearing to consider updates to its *Rules of Practice and Procedure*

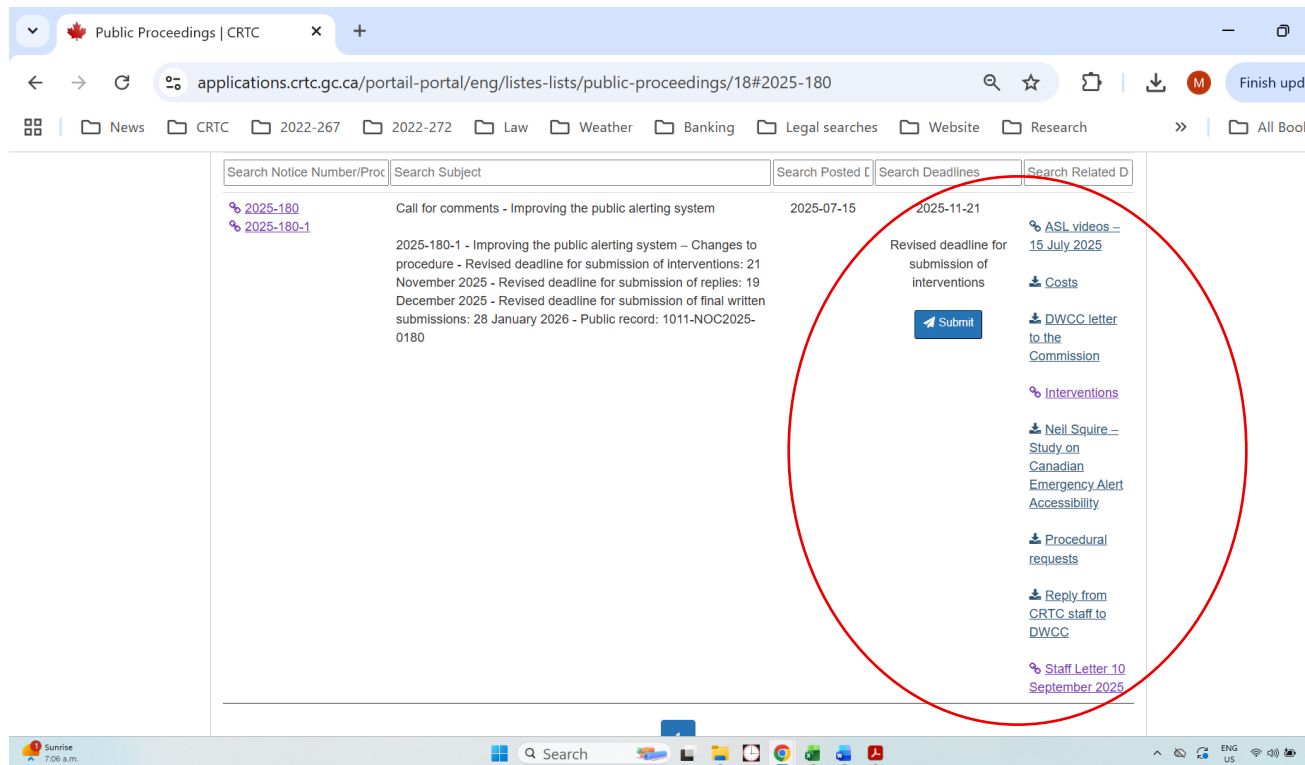
C Evidence made available by the CRTC

- 39 FRPC’s 5 November 2025 procedural request regarding TBNOC 2025-180 noted that the 2025-180 public record was at that time devoid of any objective information from the CRTC itself concerning public alerting in Canada and

³ Not its staff.

- 40 In the four months since launching 2025-180, the CRTC did not place any CRTC evidence regarding Canada’s public-alerting system on the public record of the TBNOC 2025-180 proceeding.
- 41 It did not, for example, publish any of the results it may have regarding its existing visible public-alert testing framework (questions Q6, Q6(a), Q6(b)) or of its verification and monitoring work (Q7, Q7(a) and Q7(b)), even though such information is relevant to the “Schedule for visible public test alerts” and “Actively monitoring the status of the NPAS” questions.
- 42 While 2025-180 appears to suggest, moreover, that the ‘availability of public alerts’ can be improved (see Q5) – especially for “rural, remote, and Indigenous communities in Canada” (see Q5(a)) – it has not published any information about issues related to the availability of public alerts or about other “Technology gaps in wireless public alerting availability” (Q5(b), Q5(c) and Q5(d)).
- 1 **Single study from 2024 described views regarding accessibility**
- 43 In fact, the only evidence that the CRTC made available on the 2025-180 public record is the 14-page long June 2024 Neal Squire Society [Study on Canadian Emergency Alert Accessibility](#) which was funded by Accessibility Standards Canada.

Figure 2 TBNOC 2025-180 – public record



- 44 The Neil Squire study provided results from 505 people about whether “the emergency alert system worked well for people with disabilities” (page 2). The respondents commented that the information provided in radio, television and wireless alerts was unclear, the TV alerts were too loud and the wireless alerts were very startling and sometimes frightening. The Study includes a number of suggestions for making emergency alerts easier to understand (pages 9 to 14).
- 45 Otherwise, there is no evidence from the CRTC describing the languages used in, the availability of or the results obtained from the CRTC’s monitoring of the NPAS.

2 Four sources of data disclosed by CRTC on 2025-180 deadline irrelevant to 2025-180 questions

- 46 FRPC was therefore understandably surprised that on the deadline for interventions – today, 21 November 2025 – the CRTC staff letter denying FRPC’s 5 November 2025 procedural request referred to four other sets of documents, at least three of which are relevant to understanding and responding to the CRTC questions in 2025-180. The CRTC staff’s 21 November 2025 letter was not posted on the public 2025-180 consultation page.
- 47 The CRTC’s staff letter was not posted on the CRTC 2025-180 consultations page by 4:38 pm ET on 21 November 2025, but is available in Appendix 9.
- 48 Figure 2 shows that the CRTC staff letter set out htm links provided html locations to the CRTC’s National Public Alerting System Implementation Summary, last year’s CRTC’s *Departmental Results Report 2023-24* and “[s]taff reviews and investigates public inquiries related to NPAS matters in telecom and Broadcasting”.

Figure 3 CRTC staff letter of 21 November 2025

CRTC staff notes that the Commission regularly publishes information about the NPAS, as referenced below, which any interested person can consult at any time and raise in their submissions:

- [Location of Broadcast and Wireless Emergency Alert Distributors | CRTC](#) incorporates the data sets and maps of the entities that report on compliance relating to the NPAS in annual surveys.
- [National Public Alerting System – Implementation Summary - Open Government Portal](#) provides summary of staff’s analysis on annual survey data for compliance relating to NPAS.
- [Departmental Results Report 2023-24 | CRTC](#) provides summary of departmental annual compliance targets and actual result reports (which address departmental results relating to public alerting).
- Staff reviews and investigates public inquiries related to [NPAS matters in Telecom and Broadcasting](#).

a Location map shows availability of alerting distributors, not gaps

- 49 FRPC notes that the [Location of Broadcast and Wireless Emergency Alert Distributors](#) does not appear entirely relevant to the issues in 2025-180, as it does not appear to list gaps in the distribution of alerts. For example, while 2025-180 questions Q5(a), (b), (c) and (d) address “Technology gaps in wireless public alerting availability in Canada”, the public page shown offers to explain “why some providers may not be listed” – raising the question of whether the site’s data are complete.
- 50 FRPC also notes that it is unclear whether the Location map itself on the Location page is complete. The CRTC’s Location map suggests that the entire area around Windsor, Nova Scotia has LTE coverage – Figure 3 - but does not state when these data were collected or most recently updated. The absence of clear information on this point matters because the Regional Municipality of West Hants, Nova Scotia wrote ISED and the CRTC on [9 August 2023](#) regarding inadequate cell service in their area. It noted that it had previously sent correspondence about unreliable cellular service, “particularly the unavailability of the 911 system”, and that its residents and emergency services personnel “rely on cellphones to alert people of dangers”. FRPC could not find a reply to the Municipality’s letter on the CRTC’s public Letters site (for 2023). The undated location map published by the CRTC does not provide sufficient certainty about the actual state of public-alerting coverage in Canada or within specific geographic locations.

Figure 4 Nova Scotia and LTE coverage

b CRTC Open Data NPAS table lacks data on gaps, technology and language

- 51 As for the [National Public Alerting System – Implementation Summary - NPAS Implementation Summary -Data – English](#), - first released to the public in March 2025 and updated with summary data for 2024 in September 2025 – FRPC notes that the data consist of 7 tables of data and a summary of revisions dates: Table 1. Of the seven tables of data, five describe the broadcast and telecom services that say they have implemented a public alerting system.

Table 1 CRTC’s 2025 NPAS Implementation Summary (as of 21 November 2025)

T1	Summary of broadcasting undertakings that report having implemented a public alerting system by broadcasting year
T2	Canadian subscribers with access to mobile services that report the carriage of public alerts to their customers
T3	Summary of AM radio stations (including rebroadcasting transmitters) that report having implemented a public alerting system, by region of Canada
T4	Summary of FM radio stations (including rebroadcasting transmitters) that report having implemented a public alerting system, by region of Canada

- T5 Summary of over-the-air TV stations (including rebroadcasting transmitters) that report having implemented a public alerting system, by region of Canada
- T6 Summary of cable TV, satellite TV, and IPTV service providers that report having implemented a public alerting system, by region of Canada
- T7 Summary of staff investigations initiated with respect to resolving matters of National Public Alerting System (NPAS) compliance of last-mile distributors
- T8 Revisions history

52 The tables do not

53 Table 2 summarizes the data reported by the CRTC in the NPAS Implementation Summary. CRTC tabs T1, T3, T4, T5 and T6 set out the numbers of undertakings that did not report implementing the NPAS: 41 in 2023 and 32 in 2024. T2 shows the number of subscribers to LTE or newer mobile services that did not report public alerts to their subscribers: 4.1 million in 2023 and 7.1 million in 2024. Tab T7 states that the CRTC investigated and resolved 2 matters involving last-mile distributor compliance in 2023 and 6 in 2024.

Table 2 CRTC, NPAS Implementation Strategy

CRTC, NPAS Implementation Summary		2021	2022	2023	2024
T1	Undertakings not reporting implementation	115	86	41	32
T3	AM	1	1	1	0
T4	FM	44	54	34	26
T5	TV	8	5	3	3
T6	Cable, satellite TV and IPTV	62	26	3	3
Subtotal		115	86	41	32
T2	Number of subscribers with access to LTE or newer mobile services (millions)	33.505	35.231	36.765	37.460
T2	Number of subscribers to LTE or newer mobile services that report not providing public alerts to their customers (thousands)	8.290	4.298	4.146	7.141
Subscribers of services not providing alerts as % of subscribers		24.7%	12.2%	11.3%	19.1%
T7	Total number of cases qualifying for investigations	No data	No data	2	6
T7	Number of cases resolved	No data	No data	2	6

54 Too little information is provided by CRTC tab 7 to evaluate it: no information is provided to determine, for instance, whether the resolved cases involve individual broadcasters or individual LTE mobile services.

55 Regardless, it is clear that broadcast emergency alerts are not being distributed by some radio, TV, cable and satellite TV systems. It is also clear that in 2024, 7.1 million subscribers did not receive one or more public alerts from their mobile service provider.

c CRTC Departmental Results Report 2023-24 does not reflect CRTC's Open Data data

- 56 The CRTC [Departmental Results Report 2023-24](#) states the following about emergency alerts:

Improved access to emergency services and public alerts

...

The National Public Alerting System (NPAS) is a federal, provincial, and territorial system that enables emergency management organizations across Canada to warn the public about imminent or possible dangers such as floods, tornados, fires, and other disasters. Emergency alerts are created and sent by authorized emergency management organizations, such as police departments, Environment and Climate Change Canada, and provincial and territorial governments. For public alerting, the CRTC ensures that all broadcasting undertakings participate in the public alerting system and that all Canadians have access to public alerts through wireless service providers.

In 2023-24, 98.55% of broadcasting undertakings participated in the public alerting system. The broadcasters that were not yet participating were small independent services, such as community stations. They cited challenges with funding and technical expertise as reasons for being unable to implement public alerting. These broadcasters have been given deadlines to participate in the system based on their individual circumstances.

In 2023-24, 99.99% of Canadians had access to public alerting through wireless service providers. Two small wireless service providers with a small number of subscribers were not participating in the system. The CRTC is investigating their circumstances and will determine what steps are necessary to ensure their participation.

- 57 The CRTC's 2023-24 report states that "99.99% of Canadians had access to public alerting through wireless service providers" – but does not report that 11.3% or 4.1 million of these subscribers did not receive mobile public alerts one or more times (see above, Table 2).
- 58 The CRTC's [2024-25 Departmental Report](#) states that slightly fewer Canadians (99.98%) had access to wireless public alerting – but again, does not report that 19.1% or 7.1 million of these subscribers did not receive mobile public alerts one or more times:

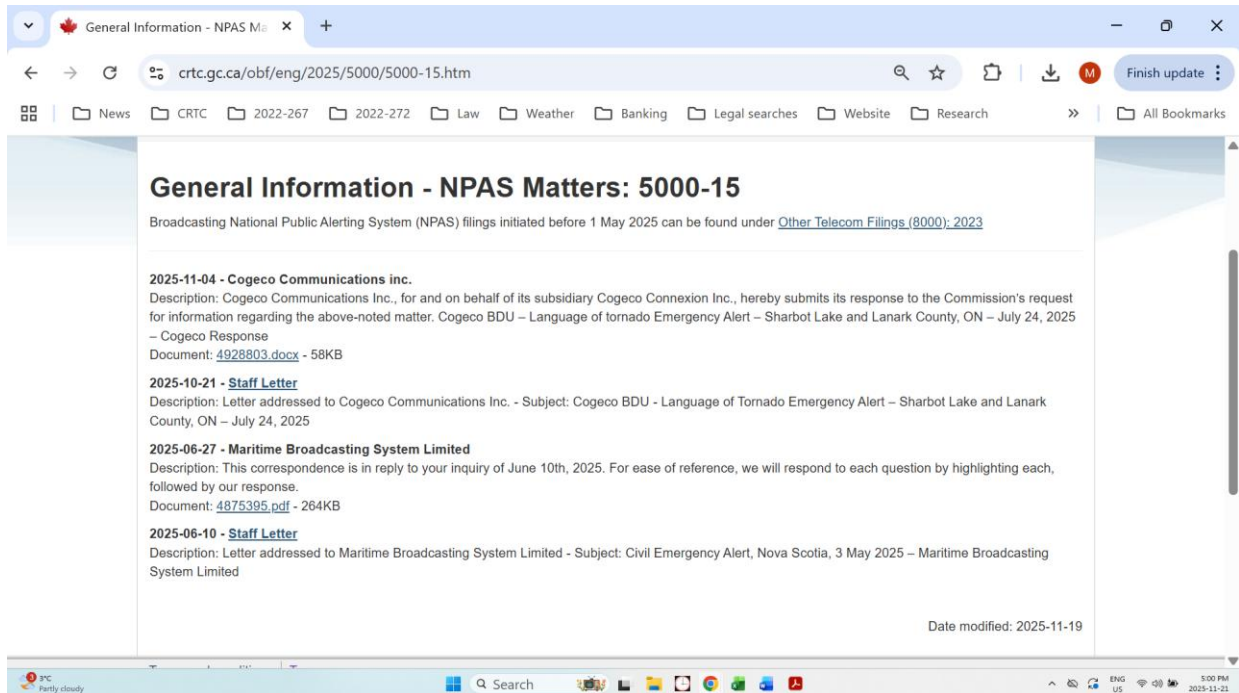
In 2024-25, 99.98% of Canadians had access to public alerting through wireless service providers. Two small wireless service providers with a small number of subscribers were not participating in the system. The CRTC has been in contact with these providers to understand their

circumstances and to emphasize the importance of participating in the NPAS. The CRTC continues to work towards their participation in the NPAS.

d CRTC letters regarding broadcast alerts limited to June to November 2025

- 59 Finally, FRPC notes the CRTC staff letter's reference to NPAS matters in telecom and in broadcasting, with two html links:
<https://crtc.gc.ca/otf/eng/2023/8000/C12-202306860.htm> and
<https://web.crtc.gc.ca/obf/eng/2025/5000/5000-15.htm>.
- 60 The first link refers to "General Information - NPAS Matters: 8000-C12-202306860". This description is misleading: in fact, the page lists 14 letters from the CRTC staff to telecom service providers, and 17 letters from TSPs to the CRTC. An initial scan suggests the CRTC staff was inquiring about failures regarding wireless alerts – but due to the late arrival of this information, FRPC was unable to analyze it further.
- 61 The second link lists two CRTC staff letters and two letters from broadcasters: Figure 5. The letters range in date from June 2025 to November 2025 and the page states that "Broadcasting National Public Alerting System (NPAS) filings initiated before 1 May 2025 can be found under [Other Telecom Filings \(8000\): 2023](#)".

Figure 5 General Information – NPAS Matters: 5000-15



The screenshot shows a web browser window with the address bar displaying [crtc.gc.ca/obf/eng/2025/5000/5000-15.htm](https://web.crtc.gc.ca/obf/eng/2025/5000/5000-15.htm). The page title is "General Information - NPAS Matters: 5000-15". Below the title, a sub-header reads: "Broadcasting National Public Alerting System (NPAS) filings initiated before 1 May 2025 can be found under [Other Telecom Filings \(8000\): 2023](#)".

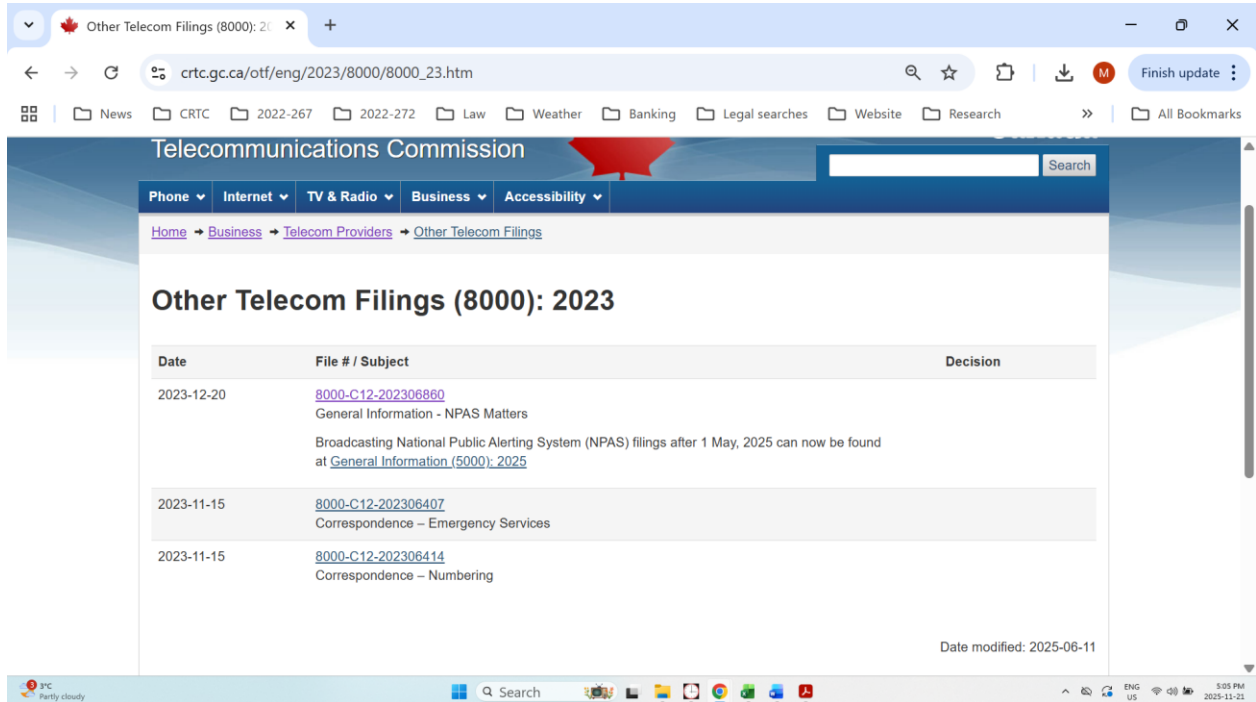
The main content area lists the following documents:

- 2025-11-04 - Cogeco Communications Inc.**
Description: Cogeco Communications Inc., for and on behalf of its subsidiary Cogeco Connexion Inc., hereby submits its response to the Commission's request for information regarding the above-noted matter, Cogeco BDU – Language of tornado Emergency Alert – Sharbot Lake and Lanark County, ON – July 24, 2025 – Cogeco Response
Document: [4928803.docx](#) - 58KB
- 2025-10-21 - Staff Letter**
Description: Letter addressed to Cogeco Communications Inc. - Subject: Cogeco BDU - Language of Tornado Emergency Alert – Sharbot Lake and Lanark County, ON – July 24, 2025
- 2025-06-27 - Maritime Broadcasting System Limited**
Description: This correspondence is in reply to your inquiry of June 10th, 2025. For ease of reference, we will respond to each question by highlighting each, followed by our response.
Document: [4875395.pdf](#) - 264KB
- 2025-06-10 - Staff Letter**
Description: Letter addressed to Maritime Broadcasting System Limited - Subject: Civil Emergency Alert, Nova Scotia, 3 May 2025 – Maritime Broadcasting System Limited

The date modified is listed as 2025-11-19.

- 62 Again, these descriptions are misleading: “Other Telecom Filings (8000): 2023” does not link to any broadcasting correspondence regarding NPAS: Figure 6.

Figure 6 Other Telecom filings (8000): 2023



Date	File # / Subject	Decision
2023-12-20	8000-C12-202306860 General Information - NPAS Matters Broadcasting National Public Alerting System (NPAS) filings after 1 May, 2025 can now be found at General Information (5000): 2025	
2023-11-15	8000-C12-202306407 Correspondence – Emergency Services	
2023-11-15	8000-C12-202306414 Correspondence – Numbering	

Date modified: 2025-06-11

- 63 FRPC’s major concern regarding TBNOC 2025-180 is that the CRTC apparently does have and has had relevant evidence about broadcast emergency alerting – in the shape of detailed correspondence.
- 64 The CRTC chose not to disclose this information in 2025-180, and when it did provide information on 21 November 2025, did not provide links to historical correspondence regarding broadcast emergency alerting.
- 65 Withholding relevant evidence such as this placed FRPC, and we suspect, others, at a serious disadvantage relative to the companies whose business is broadcasting, telecommunications or both. The CRTC bears a duty to do better.

Recommendation 5 The CRTC must review its practices regarding the disclosure of relevant evidence that it has, to provide clear descriptions of and links to this evidence in its notices of consultation

D Relevant evidence withheld from TBNOC 2025-180 public record

1 CRTC’s previous approach to broadcast emergency alerts

- 66 TBNOC 2025-180 refers to four “[r]elated documents”:

Call for comments – Co-development of an Indigenous Broadcasting Policy, Broadcasting Notice of Consultation CRTC [2024-67](#), 22 March 2024

Distribution of emergency alert messages – Decommissioning of the Alberta Emergency Alerting System and transition to the National Alert Aggregation Dissemination System, Broadcasting Information Bulletin CRTC [2022-232](#), 29 August 2022

Senior Officials Responsible for Emergency Management – Application to modify the wireless public alerting visible test schedule, Telecom Decision CRTC [2019-239](#), 8 July 2019

Procedures for filing confidential information and requesting its disclosure in Commission proceedings, Broadcasting and Telecom Information Bulletin CRTC [2010-961](#), 23 December 2010; as amended by Broadcasting and Telecom Information Bulletin CRTC [2010-961-1](#), 26 October 2012

- 67 Similarly, while the CRTC is presumably aware of its own approach to emergency alerting – see Appendix 11 – parties lacking this depth of knowledge and relying on 2025-180 for guidance may not be aware of [Broadcasting Regulatory Policy CRTC 2014-444](#), which sets out the CRTC’s current approach to emergency alerting in broadcasting. The CRTC at one time employed a more systematic approach to documenting its previous research and policies in important areas such as emergency alerting; FRPC recommends that its notices of consultation use a standardized format that, apart from providing evidence available from the CRTC, also includes a reasonably complete list of previous regulatory documents.

Recommendation 6 The CRTC should ensure that its consultations include references to its previous determinations regarding the areas canvassed by the notices of consultation

2 CRTC’s 2021 survey of attitudes towards wireless public alerting

- 68 An especially puzzling aspect of the 2025-180 public record is that it neither includes nor refers to the results from a national survey of 1400 Canadians about attitudes towards wireless public alerting: *Exploring attitudes towards Wireless Public Alerting System in Canada*. Undertaken for the CRTC from February 2020 to January 2021 at a cost of \$108,805.29,²¹ This study is no longer posted on the CRTC’s website.²² It is available, however, from the Government of Canada Collections site:
https://publications.gc.ca/collections/collection_2021/crtc/BC92-113-2021-eng.pdf.

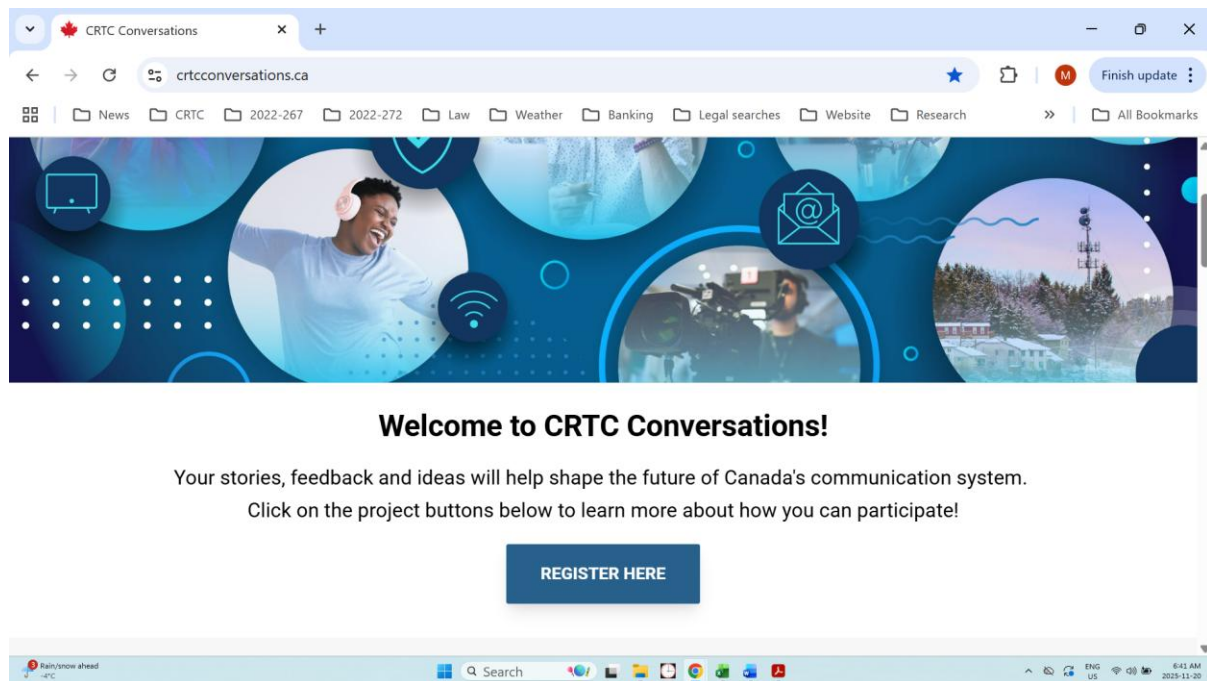
- 69 Among other things, the Kantar study addressed Canadians’ awareness of wireless alerting, assessment of the frequency of yearly tests, satisfaction with the language in which they received alerts – all of which seem relevant to the 2025-180 consultations.

Recommendation 7 The CRTC should ensure that its consultations include links to the most recent empirical and survey research it has undertaken concerning the matters raised in the consultations

E “CRTC Conversations” and Canadians’ right to privacy

- 70 The CRTC has enabled interested individuals to comment through an “online engagement platform” called, “[CRTC Conversations](#)”: Figure 7.

Figure 7 Welcome to CRTC Conversations!

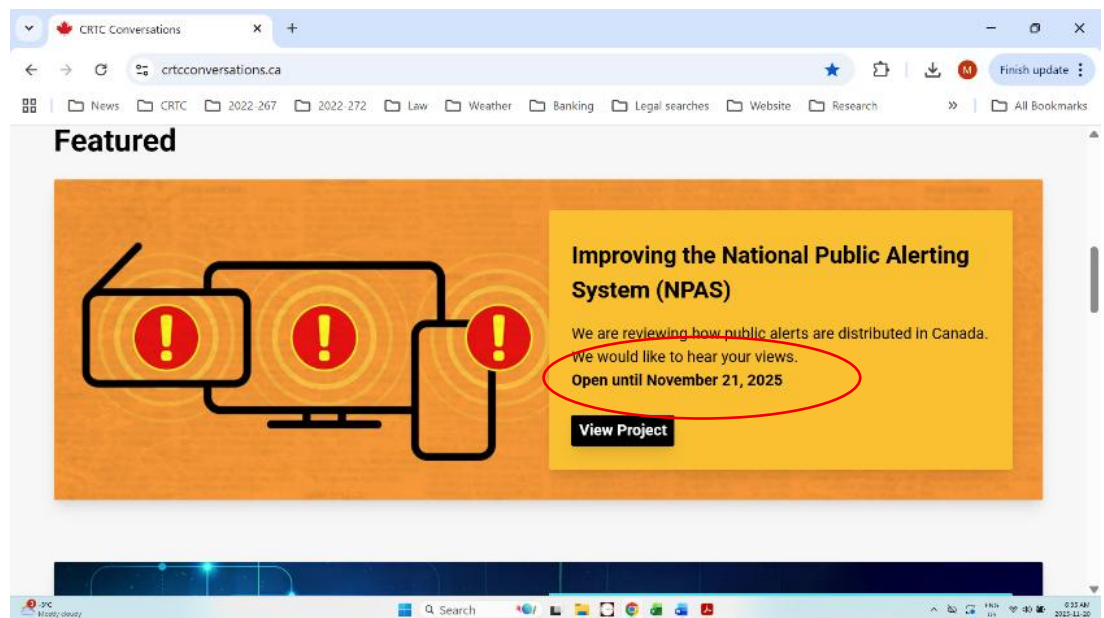


- 71 The CRTC apparently began to use the [CRTC Conversations](#) platform in mid-2022, when it invited interested persons to share their views about certain questions posed in Telecom Notice of Consultation CRTC 2022-147 regarding telecommunications in the far North.²³ The CRTC added a 71-page report on the 84 “submissions made” using the [CRTC Conversations](#) platform on 10 January 2023 (before the April 2023 public hearing began) and parties to 2022-147 were invited to consider the report “in their further comments.”²⁴ The CRTC also incorporated the [CRTC Conversations](#) engagement platform within Broadcasting Notice of Consultation CRTC 2024-67, and mentions the [CRTC Conversations](#) platform in TBNOC 2025-180 at paragraph 13. The CRTC stated that it

...welcomes comments through its online engagement platform, [CRTC Conversations](#). This user-friendly online engagement platform provides a specific list of questions that participants can answer quickly online or through a mobile device and in multiple formats, including audio and video. All submissions received via CRTC Conversations will be placed on the public record of this proceeding but participants on CRTC Conversations will not be considered parties to the proceeding. ...

- 72 2025-180 set the deadline for [CRTC Conversations](#) comments as 14 October 2025. [TBNOC 2025-180-1](#) extended the deadline for interventions to 21 November 2025 but did not state whether the extension also applied to the [CRTC Conversations](#): on 20 November 2025 the [CRTC Conversations](#) page showed a deadline of 21 November 2025 (Figure 8).

Figure 8 Extended deadline for CRTC Conversations on 2025-180



- 73 The Forum has two major concerns regarding the [CRTC Conversations](#) “engagement platform”, having to do with the treatment granted to interveners and commentators, and commentators’ right to privacy.

1 Two-tier participation

- 74 The CRTC has said that [CRTC Conversations](#) is “user-friendly” (2024-67, Overview; 2025-180, ¶13) and “facilitates participation among people who may be less familiar” (2024-67, ¶106). Its notices of consultation explain that people’s comments or “submissions” are attributed “to the username given

during the registration process on the platform”: 2022-147, ¶103; 2024-67, ¶108; 2025-180, ¶146.

- 75 The Forum notes that in 2019 the CRTC invited the public to comment on the renewals of CBC/R-C’s broadcasting licences, either through interventions or through comments on Facebook. It posted copies of 72 comments that it received from an unknown number of commentators at [Online consultation: CBC/Radio-Canada programming](#), in terms of five headings.²⁵ As the same proceeding attracted “over 10,500 interventions and a petition with over 10,400 signatures”,²⁶ what facts support the CRTC’s conclusion that its existing click-on-the-submit button intervention system is less user friendly than [CRTC Conversations](#)?
- 76 The CRTC has also not clearly explained the actual status of the [CRTC Conversations](#) comments, in the same way that it did not clearly explain its decision⁴ in the mid-2010s to run a live twitter feed about individual CRTC proceedings inside the CRTC hearing rooms while the CRTC’s hearings were taking place.
- 77 The current, 2010 *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* set out the requirements that participants in its proceedings must meet in terms of information and evidence including facts. Section 1 defines “party” as “an applicant, respondent or intervener” and empowers the CRTC to require “a party” to provide information necessary to the CRTC’s understanding. May the CRTC ask commentators in the [CRTC Conversations](#) for information?
- 78 Subsection 26(2)(f) states that interventions filed by an interested person “must ... contain a clear and concise statement of the relevant factsfor the person’s support for or opposition to” the application or the proceeding. the application”. Is this also the case for [CRTC Conversations](#) commentators?
- 79 The CRTC has warned [CRTC Conversations](#) participants that they “will not be considered parties” in the 2022-147 (¶104), 2024-67 (¶109), 2025-180 (¶147) proceedings. Yet it has also told interveners that records of the [CRTC Conversations](#) are placed “on the public record” of its proceedings (2022-147, ¶102). Does the Commission believe that interveners or applicants should respond to all submissions on the public record when commentators lack formal standing as parties to CRTC proceedings?
- 80 Subsection 27(1) of the CRTC’s *Rules* then permits an “applicant” to “reply to an answer or to the document of an intervener”, while subsection 27(2)(b) states that replies “must ... admit or deny the facts alleged” by the intervener. Having

⁴ During the term of then-Chairperson Blais.

invited non-party commentators to participate in some (but not all) of its proceedings, does the CRTC believe that interveners (that filed ‘formally’) should respond to commentators’ submissions placed on the public record even though the submissions are not being made by parties to a given proceeding?

- 81 These questions matter because the CRTC must base its decisions on evidence and now appears to be accepting some commentators’ submissions as evidence. When the Commission issued Telecom Decision CRTC 2024-99 in May 2024, for example, and directed Northwestel to stop adding a \$20 surcharge to the invoices of customers who buy the company’s digital Internet services without buying its home-phone service, it referred to “several participants who provided comments via the [CRTC Conversations](#) online platform” and “expressed frustration about paying for a service that they do not want or use” (paragraph 45). The challenge for actual interveners in the 2025-180 or any other CRTC proceeding is that while its *Rules* require interveners to identify themselves, [CRTC Conversations](#) commentators may identify themselves by a self-selected username: Appendix. Should CRTC decisions be based on untested submissions made by commentators using pseudonyms?
- 82 FRPC’s concern is not with the outcome of the 2024-99 decision but with the CRTC’s apparent decision to treat pseudonymous participants in [CRTC Conversations](#) in the same way that it treats identified and identifiable interveners that, presumably, met and meet the CRTC *Rules*.
- 83 Procedural *Rules* matter, as Rogers recently explained:
- ... [t]he intervention period exists to ensure that all parties have a fair opportunity to understand positions advanced by others, respond to those positions, and allow the record to close so that the Commission can make informed decisions based on complete and balanced evidence. This procedural structure is not a mere formality but a safeguard that protects the integrity of the CRTC’s proceedings and ensures fairness to all participants.²⁷
- 84 It is unclear what procedural rules, if any, apply to [CRTC Conversations](#) commentators, making it unclear how actual parties in the CRTC’s proceedings are to treat their statements.

Recommendation 8 The CRTC should amend its *Rules of Practice and Procedure* to address the rights and responsibilities of all participants with respect to comments filed through [CRTC Conversations](#)

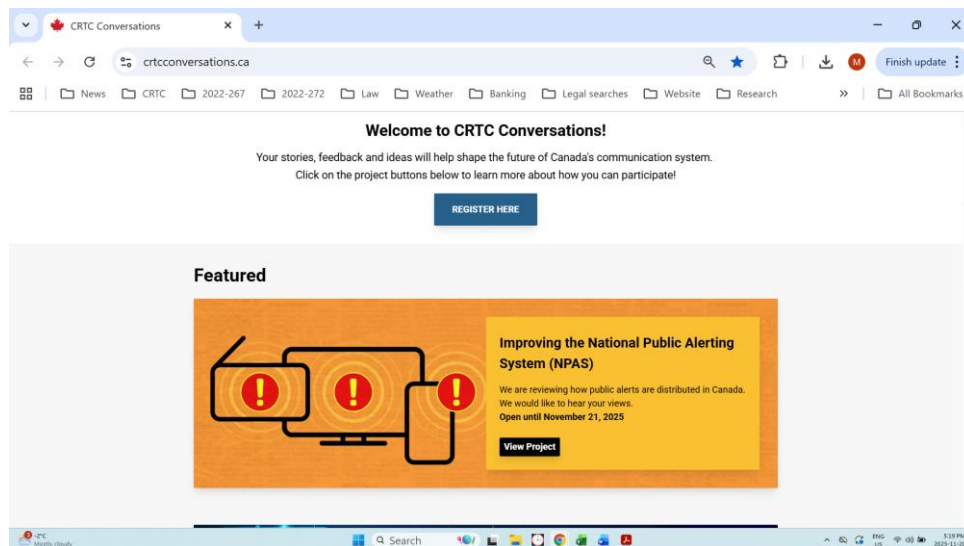
2 Participants’ privacy rights in [CRTC Conversations](#)

- 85 The CRTC has assured participants in the online engagement platform that “any personal information” provided through the platform “will be used and may be disclosed for the purpose for which the information was obtained or compiled by

the CRTC, or for a use consistent with that purpose”: 2022-147 at ¶103, 2024-67 at ¶108 and 2025-180 at ¶46. This assurance comports with subsection 5.3(1) of Canada’s *Personal Information Protection and Electronic Documents Act* (PIPEDA): “[a]n organization may collect, use or disclose personal information only for purposes that a reasonable person would consider are appropriate in the circumstances.”

- 86 For the reasons that follow, CRTC’s cautionary notes about comments filed through [CRTC Conversations](#) are at least incomplete, if not misleading.
- 87 First, the link in 2025-180 leads to an invitation to register and to learn more about 2025-180.

Figure 9 2025-180 and “Welcome to CRTC Conversations!”



- 88 The [CRTC Conversations registration page](#) requires those who register to provide their
- Username
 - E-mail
 - Password [and reconfirmed password]
 - Postal Code
 - Identification: Female, Male, Non-binary or Other
 - Age: under 18, 18-29, 30-49, 50-69 or 70+, and their
 - Identification: Indigenous person, Person with disability, Racialized person.
- 89 The registration page also requires those registering to agree to the site’s Terms of Use and Privacy Policy. The [Privacy Policy](#) is apparently issued by the CRTC.

- 90 The Terms of Use that set out terms and conditions for users registering with [CRTC Conversations](#) are issued by Granicus, LLC – that the CRTC commissioned to collect and display “user content” (first paragraph of the Terms of Use).
- 91 As noted earlier, the CRTC assured [CRTC Conversations](#) users that “any personal information” provided through this platform ... will be used and may be disclosed for the purpose for which the information was obtained or compiled by the CRTC, or for a use consistent with that purpose”. Section 8 of the Terms of Use, on the other hand, tells users that
- You hereby grant Granicus a nonexclusive, perpetual, irrevocable, royalty-free, paid-up right and license to: (a) use your name or user/screen name and Your Content for Granicus’s business purposes; and (b) sublicense Your Content to the Entity for its business purposes.
- 92 Section 13 of the Terms of Use is followed by a description of Granicus: “a Limited Liability Company having its principal place of business at 1152 15th Street NW, Suite 800, Washington, DC 20005, USA”.
- 93 In other words, while the CRTC assures [CRTC Conversations](#) registrants that it will only use their personal information for the purposes of its proceedings, registrants also agree that an American company located in the United States may use their name, username and content for the company’s business purposes. The scope of personal information is expanding over time and includes “any factual or subjective information ... about an identifiable individual”, now including an individual’s e-mail address, postal code, and gender:²⁸ do [CRTC Conversations](#) registrants want a US-based company, its affiliates and its subsidiaries to use registrants’ information about their postal code, age, gender and e-mail address for the company’s purposes?

Recommendation 9 The CRTC should immediately require Granicus to change the Terms of Use to prohibit the company from retaining any personal information about [CRTC Conversations](#) registrants

III CRTC’s jurisdiction regarding emergency alerting

- 94 Canada has used its electronic communications system to warn people about urgent matters for more than 170 years, beginning with the formation of telegraph companies in the mid-1800s.²⁹ Their operators were required to give priority to messages related to public safety.³⁰
- 95 The life-saving potential of wireless telegraphy – radio – was known from the early 1900s. Radio stations on Canada’s east coast “proved exceptionally valuable in communicating to steamers coming through the straits of Belle Isle news as to weather conditions prevailing in the straits”, communicating with

- ships “enveloped in thick fog” and providing news “to all vessels equipped with the Marconi apparatus”.³¹
- 96 By the early 1920s Canadian radio station licences required that priority be given to the transmission of messages when required by “any department of the Government”,³² a provision that became part of Canada’s 1933 and 1937 radio regulations³³ and was also set out in the 1936 *Canadian Broadcasting Act*.³⁴
- 97 In the years leading to the Second World War the Canadian federal government established a Department of Civil Air Raid Precautions (ARP) – necessary, given airplanes’ growing ability to cross oceans to reach and potentially attack Canadian coasts or (later) inland territory.³⁵ ARP equipment included sirens to alert communities:³⁶ by 1939 only 94 radio stations were operating in Canada³⁷ to serve the one in two households with a radio set, and by the end of the War only half of Canadian households had a telephone.³⁸
- 98 The use of atomic bombs at the end of the Second World War led Canada to join the North American Aerospace Defense Command (NORAD), the “detection and telecommunication system”,³⁹ and led Canada’s Privy Council to create an Emergency Measures Organization.⁴⁰ From 1959 to 1992 Canadians would have been warned about an atomic attack by teletype and voice messages sent from National Defence Headquarters in Ottawa and from there to the Canadian Federal Warning Centre in Carp (Ontario). The Carp Centre would then sound the Attack Warning Siren System that would in turn would alert Provincial Warning Centres.⁴¹ Conferences “in communication and engineering” were also held from 1954 to 1972 by the Canadian Civil Defence College for municipal leaders.⁴²
- 99 As for broadcasting, the 1951 *Broadcasting Act* specifically empowered the federal communications regulator, the newly created Board of Broadcast Governors, to enact regulations “requiring licensees to broadcast network programs of public interest or significance”.⁴³
- 100 In 1968 Parliament rewrote its broadcasting law and created the CRTC. Unlike its predecessors, the CRTC could issue broadcast licences⁴⁴ for up to five years and impose conditions related to individual licensees’ circumstances.⁴⁵ It could also enact regulations to implement the *Broadcasting Policy for Canada*.⁴⁶ The CRTC could consider “complaints”,⁴⁷ and Cabinet was able to direct the CRTC to require broadcasters to carry programs “deemed ... to be of urgent importance”.
- 101 Little online information is available on the CRTC’s website about Cabinet’s directions to the Commission with respect to urgent broadcasts, and CRTC decisions from 1968 to 1983 about its approach to emergency broadcast programming are unavailable on its website.

- 102 The CRTC's 1973 radio regulations enabled it to require radio networks and stations "to broadcast programs of public interest or significance as determined by the Commission."⁴⁸ The Commission amended the radio regulations in 1986 to authorize broadcasters holding AM and FM radio licences in the same communities to simultaneously broadcast programs "necessitated by public emergency."⁴⁹ Emergencies were not mentioned in its television regulations, and the CRTC's cable regulations prohibited cable systems from altering the programming services they carried.⁵⁰
- 103 The CRTC licensed two services that broadcast weather warnings under the 1968 *Act*, one for radio and one for television. "Weatheradio" is an audio-only service launched in 1976 by the then-new Department of the Environment (today's Environment and Climate Change Canada).⁵¹ The CRTC approved Weatheradio's carriage by cable systems in 1984,⁵² describing it in 1985 as "an automated weather and time service".⁵³ In 1988 the Commission defined Weatheradio as an alphanumeric service, enabling allowed cable systems to offer it to their subscribers without prior CRTC approval.⁵⁴
- 104 In 1987 the CRTC granted Pelmorex Weather Networks (Television) Inc. broadcasting licences for the audiovisual programming service now known as MétéoMédia/The Weather Network in 1987. It licensed the service in part to improve public safety "through the provision of up-to-the-minute essential weather information from local, regional and national perspectives, at any time of the day or night"⁵⁵ The Weather Network/MétéoMédia was initially only available to those who subscribed to distribution systems such as cable TV. If a system decided to offer the service to its subscribers, it had to provide The Weather Network/MétéoMédia as part of each subscriber's set of basic television services⁵⁶ for a wholesale rate of \$0.20 per month (rising to \$0.24 in its fifth year).⁵⁷
- 105 Parliament amended its broadcasting legislation in 1991 to expand on the issues set out in Canada's *Broadcasting Policy*, extend licence terms to seven years, address accessibility, clarify the role of cable distributors and to explicitly empower the CRTC to exempt broadcasters from regulation and licensing if they were unlikely to help implement the *Policy*.⁵⁸ Parliament gave the CRTC the authority to hold public hearings, issue reports and make decisions "in connection with any complaint ... within its jurisdiction ... if ... satisfied it would be in the public interest to do so."⁵⁹
- 106 The 1991 *Act* retained Cabinet's power with respect to urgent broadcasts (**Error! Reference source not found.**), but did not otherwise address emergencies. It also empowered the CRTC to exempt broadcasting services from some or all of its regulations. It exempted Weatheradio Canada from licensing and regulatory requirements within a year of the new *Act*'s passage,⁶⁰ and exempted

- temporary networks from licensing requirements when they covered “unforeseen events of relatively short duration” including “public emergencies such as environmental disasters”⁶¹ as long as coverage “of unforeseen public emergencies” lasted a week or less.
- 107 In 1993 the CRTC emphasized the importance of radio in distributing news and emergency information. It said that “in many communities not served by local daily newspapers or television stations, local radio stations are the only daily source of local news, information, and emergency messages”.⁶² The CRTC’s 1994 decision to renew MétéoMédia/The Weather Network did not discuss its weather advisory system, coverage of natural and other disasters or safety instructions.⁶³
- 108 By 1997 the CRTC was expressing concerns⁶⁴ that radio stations’ automated programming systems, satellite programming and lack of staff on weekends was limiting the broadcast of prompt warnings about weather emergencies⁶⁵ by commercial radio stations. It amended its BDU regulations to enable BDUs that made programming services available to subscribers for a monthly fee to alter these programming services to include alert messages. These messages would warn subscribers about “imminent or unfolding danger to life or property”⁶⁶ in the programming services they carried – if the programming services agreed.⁶⁷ The Commission defined “emergency alert message” as “a warning to the public announcing an imminent or unfolding danger to life or property”.⁶⁸
- 109 Following major ice storms in southern Ontario (and Ottawa-Gatineau) in early 1998 the CRTC said it would “convene a meeting of interested parties to discuss ways to ensure the prompt broadcast of weather warnings”;⁶⁹ it did not publish additional information about this initiative and the date(s), participants and results of this meeting or meetings are unknown.
- 110 In 2000, however, the CRTC denied a request to increase the then-seven days during which public emergency radio undertakings could operate without licensing because “[i]n all likelihood, any emergency that did exist beyond this period would be covered by conventional radio and television stations.”⁷⁰ The Commission’s notice did not provide any information about stations’ capacity (in light of automation and staff layoffs) to provide this coverage.
- 111 In 2001 the CRTC denied Pelmorex’ proposal that its MétéoMédia/The Weather Network specialty (now, discretionary) television programming services provide “all-channel alerts ... about weather conditions and other emergencies”. The company proposed that all BDUs would display alphanumeric crawls on every programming service they distributed⁷¹ which would include local text warnings “of imminent threats to life or property caused by severe weather disturbances, natural disasters or other emergencies on behalf of authorized government

agencies such as Environment Canada”.⁷² Pelmorex also asked to raise its maximum wholesale subscriber rate by 59%, or by \$0.13 per subscriber per month.

112 The CRTC denied the application without a public hearing. While the Commission considered that it had jurisdiction to deal with the application⁷³ and that an all-channel alert system could complement the “effective alerts” provided by “many conventional broadcasters ... to their listeners and viewers”,⁷⁴ Pelmorex’ proposal lacked evidence to justify the 54% increase in its rate.⁷⁵ Moreover, said the Commission,

- warnings would only be distributed on analog channels, with digital versions available “within five years” (*i.e.*, 2006)
- BDUs would bear a cost to ensure that large interconnected distribution systems only distributed the alerts to their intended audiences (to minimize confusion)⁷⁶
- a text-only service would not serve the needs of those with poor vision or unable to see⁷⁷
- little information was provided about the “operational, financial and technical benefits of any alternatives suggested by distributors”⁷⁸ and
- broadcasters were concerned that the text crawls would disrupt closed captioning and other screen content.⁷⁹

113 Meanwhile, provinces were beginning to establish their own emergency alerting systems. In 2002 authorized law-enforcement agencies in Alberta began to issue Amber⁵ Alerts, messages providing “immediate and up-to-date information about” child abductions.⁸⁰

114 In 2004 Pelmorex submitted a second all-channel alert application and requested its mandatory carriage⁶ by BDUs.⁸¹ The company wanted to provide an all-channel alert programming service that would “broadcast timely local warnings of imminent threats to life or property” from “severe weather”, “natural disasters or other emergencies” using a text-based crawl imposed on the programming services distributed by BDUs. Pelmorex again asked the CRTC for mandatory carriage of this new service – a requirement that (large) Class 1 BDUs carry the new service.⁸²

⁵ AMBER stands for America’s Missing: Broadcast Emergency Response (Joint Federal/Provincial Commission into the April 2020 Nova Scotia Mass Casualty, *Turning the Tide Together: [Final Report of the Mass Casualty Commission, Volume 4, Community](#)*, Chapter 5 (“Public Warning Systems”), page 167.

⁶ Mandatory carriage by BDUs of an audio or audio programming service provide the service with income from all BDU subscribers.

115 In 2005 the CRTC invited other applications to provide an “All Channel Alert (ACA)” service to enable BDUs to “broadcast timely local warnings of imminent threats to life or property caused by severe weather disturbances, natural disasters or other emergencies.”⁸³ Pelmorex (MétéoMédia/The Weather Network’s operator), the CBC and BCE filed applications.⁸⁴

116 The CRTC held a public hearing in May 2006 to consider the applications.

a *Argument that CRTC lacked jurisdiction*

117 Rogers argued at the CRTC’s May 2006 hearing that the CRTC lacked jurisdiction either to license an alphanumeric service or to require BDUs to distribute the non-programming service Pelmorex proposed as they were not related to the programming BDUs offered.⁸⁵

118 Rogers also said that while the *Broadcasting Act* made broadcasters responsible for the programs they broadcast (through subsection 3(1)(h)), BDUs could not be responsible for the content of all-channel alert services.⁸⁶

b *Argument that CRTC could regulate alerts through Telecom Act*

119 Rogers said that the all-channel alert was actually a telecom service⁸⁷ and that nothing prevented the Commission “from using the Telecommunications Act to order the cable companies and other BDUs to carry an alerting service.”⁸⁸

c *Argument that goodwill would ensure emergency alert messages’ carriage*

120 While Rogers told the Commission in 2006 that it supported an all-channel alert system, the company opposed Pelmorex’ application and mandatory carriage of an all-alert channel.⁸⁹ The CRTC’s regulations at that time prohibited BDUs from altering the signals they carried and, according to Rogers, it “is sort of odd to go from forbidden one day to mandatory the next day. It makes more sense to go from forbidden to voluntary ... the cable operators in Canada will respond.”⁹⁰ It proposed that goodwill would ensure cable operators’ distribution of emergency alert messages,⁹¹ and that “a couple of years” would tell the Commission “if the cable operators are stepping up to the plate. If they are not ... make it mandatory.”⁹²

121 Critiquing Pelmorex’ involvement in all-channel alerts, Rogers told the CRTC hearing panel that it would be just as simple for a federal, provincial or municipal government to send its alerts to Rogers or “to all of the relevant servers with a single push of a button.”⁹³

d *2007 emergency alerts approach based on voluntary participation*

122 The CRTC issued its decisions in early 2007, the same day that it published its approach “to the establishment of emergency alert services in Canada”,⁹⁴ one “based on the voluntary participation of distributors”.⁹⁵ (In 2009 the CRTC’s

- Chairperson described its approach as a challenge to “the broadcasting industry to work together to build and operate an emergency system, and to come up with a solution by February 2009.”⁹⁶⁾
- 123 Insofar as emergency alerts’ alphanumeric content was concerned, the CRTC considered that non-programming, alphanumeric material that overlaid the television programming displayed by The Weather Network/MétéoMédia to be “essentially connected to, or an enhancement, of the programming service as a whole.”⁹⁷⁾
- 124 The CRTC revised its BDU regulations to permit BDUs to alter the programming services they distributed to include warnings about “the most urgent and serious of emergencies”. Specifically, BDUs could include warnings in programming services without their operators’ consent when there was “an imminent or unfolding danger to life”. BDUs would, however, need operators’ consent (or CRTC approval) to distribute warnings about threats to property.⁹⁸⁾ the Commission stated there were “other reliable sources of information used by Canadians to learn about less immediate threats” related to property” and that its regulatory changes would “attenuate concerns about the potential overuse of the emergency alert system.”⁹⁹⁾
- 125 The CRTC’s amendments to the BDU regulations enabled Bell ExpressVu to carry emergency alert messages without obtaining the prior consent of programming services.¹⁰⁰⁾
- 126 The CRTC also approved the CBC’s application to “provide an all-hazard, all-channel emergency broadcasting public alert service” in which “emergency alert messages would be delivered to CBC’s National Alarm Centre in Ottawa and then uplinked for distribution to the CBC’s entire radio transmission backbone”¹⁰¹⁾ or “to any particular geographic area”.¹⁰²⁾ (In 2020, the CBC undertook plans to add a warehouse to its ‘National Alarm Centre’ in the west end of Ottawa.¹⁰³⁾
- 127 Pelmorex had asked the CRTC for a mandatory distribution order, amendments to its conditions of licence to provide “alerts and messages related to imminent or unexpected threats to life or property caused by severe weather disturbances, natural disasters or other emergencies in local, regional and national areas of Canada”¹⁰⁴⁾ and a 35% subscriber rate increase (from \$0.23 to \$0.31). The CRTC denied Pelmorex’ mandatory carriage request and its rate increase, but encouraged it to negotiate with BDUs to carry the new all-channel alert service it proposed.¹⁰⁵⁾
- 2 2008-2013: failure of voluntary approach
- 128 By 2008 limited evidence suggested to the CRTC that not all BDUs were voluntarily carrying warnings about emergencies.¹⁰⁶⁾ That year Public Safety

- Canada also assumed “the lead role” in developing “a national public alerting system” and said it would request proposals “to build an aggregation and distribution centre for the proposed system”.¹⁰⁷
- 129 By mid-2009 the CRTC said that it had not received information about the funding of Public Safety Canada’s alerting system and that the latter had not released a request for proposals about the alerting system.¹⁰⁸ The CRTC then ordered BDUs to distribute Pelmorex’ Weather Network/MétéoMédia services as part of their digital basic service.¹⁰⁹ In exchange the company committed “to enabling the broadcast of emergency alerts by acting as a national public alerting aggregator and backbone network distributor.”¹¹⁰ It told a CRTC hearing panel that it expected “to work with and complement any of the other alerting initiatives at Public Safety or the provinces.”¹¹¹ Pelmorex explained that it “would establish a governance council with [Public Safety] and the provinces” to give it “the advance and guidance on the development of the system”.¹¹² Pelmorex acknowledged to the CRTC hearing panel that it understood that the company’s role was impermanent.¹¹³
- 130 (Several interveners in the CRTC’s 2009 proceeding again argued that the emergency alerts distributed by Pelmorex were alphanumeric and hence not ‘programs’ under the *Broadcasting Act* – the CRTC reiterated that the alerts are connected to and enhance The Weather Network/MétéoMédia and are subject to the Commission’s jurisdiction.¹¹⁴)
- 131 In 2011 a CRTC hearing panel¹¹⁵ made carriage of The Weather Network/MétéoMédia programming services mandatory for BDUs, with dissent by a non-panel Commissioner.¹¹⁶ At this time six provinces and two territories had not signed agreements with Pelmorex to use its National Alert Aggregation and Distribution system.¹¹⁷ In renewing the company’s Weather Network/MétéoMédia licence, the CRTC made its mandatory BDU carriage conditional upon Pelmorex’ execution of “NAAD System User Agreements with all FPT EMOs [Federal-provincial-territorial emergency management officials], including Environment Canada, by no later than 1 January 2012.”¹¹⁸
- 132 The CRTC’s 2011 renewal decision also noted that some parties in the renewal proceeding had “expressed concerns relating to governance, specifically relating to the effectiveness of the Governance Council”: two interveners said this body had “evolved into an advisory body rather than one providing direction to Pelmorex”.¹¹⁹ The CRTC said it might review the National Alert Aggregation and Dissemination System’s governance structure if sufficient evidence were “provided to demonstrate that the existing model is ineffective.”¹²⁰
- 133 The Commission continued to hear that some broadcasters were not participating in the National Public Alerting System. From 2011 on, Ministers

“responsible for emergency management” in five provinces “intervened in a number of [CRTC] licensing or licence renewal proceedings to seek commitments from licensees to participate in the NPAS.”¹²¹

- 134 In mid-2013 the CRTC wrote broadcasters “requesting information relating to their participation” in the National Public Alerting System.¹²² Less than a year later, in January 2014, the Federal/Provincial/Territorial Deputy Ministers responsible for emergency management asked the CRTC to require all commercial broadcasters “to distribute emergency alert messages to the Canadian public by the end of 2014.”¹²³

3 2014: broadcasters’ participation in NPAS becomes mandatory

- 135 Seven years after the CRTC adopted a voluntary approach to broadcasters’ participation in the National Public Alerting System, the CRTC found that only “a few broadcasters” were “distributing emergency alert messages to the public”¹²⁴ The Commission repeated the position it had stated in 2011: “...the broadcasting system has a vital role to play in the provision of emergency alert messages to Canadians” and because “holding a broadcasting licence is a privilege, broadcasters ... have a duty to inform the public of imminent perils.”¹²⁵

- 136 In February 2014 the CRTC proposed to change its regulations and some conditions of licence “to implement the mandatory distribution of emergency alert messages” by radio and TV stations, video-on-demand services and BDUs.¹²⁶

a Broadcasters’ public service obligation to broadcast alerts

- 137 In August 2014 the CRTC began to mandate broadcasters’ carriage of emergency alerts. It reasoned that the privilege of holding a broadcasting licence means that “broadcasters and BDUs have a duty to inform the public of imminent perils. This is at the core of the public service obligations of all broadcasters.”¹²⁷ The Commission pointed out that “the full participation of the broadcasting industry is important in order for the [National Public Alerting System] to be effective in safeguarding and warning Canadians.”¹²⁸

- 138 The CRTC’s 2014 emergency alert amendments set deadlines for all last-mile distributors such as radio and television stations and broadcasting distribution services to participate in the National Public Alerting System, by requiring them to transmit the emergency alert messages aggregated and disseminated by Pelmorex Corp’s NAAD System. The CRTC’s regulations are summarized in **Error! Reference source not found..**

- 139 All broadcasters were to transmit emergency alert messages by April 2016. The CRTC required public and commercial, broadcasters to participate in the National Public Alerting System before April 2015.¹²⁹ Indigenous, campus and community

stations were to participate before April 2016.¹³⁰ (Several broadcast renewal decisions by the CRTC since then have addressed individual broadcasters' failure to meet these deadlines.)

- 140 The CRTC also strongly encouraged "the use of digital media and mobile platforms to alert Canadians to imminent or unfolding dangers, particularly given the increase since 2011 in the use of mobile devices by Canadians."¹³¹

b Emergency alert messages must be broadcast if lives (not property) at risk

- 141 The CRTC's 2014 emergency alert amendments limited the warnings' content to those alerting "Canadians of imminent threats to life".¹³²

- 142 While acknowledging that emergency alert messages "issued by public officials ... for immediate distribution to the public ... warn of danger to life *and property*"¹³³ [italics added], the CRTC said that it was at that time "focusing on emergency alert messages relating to imminent or unfolding dangers to life ... for which an immediate public call to action is required."¹³⁴ The CRTC's public notice did not set out reasons for this change.

c Annual reports on measures' effectiveness

- 143 The CRTC's 2014 amendments regarding emergency alerts discussed how their effectiveness should be measured. The Commission concluded that a number of factors were needed: "general level of industry compliance, transmission effectiveness, alert quality, availability of emergency alert messages to Canadians, as well as the success of system tests and actual emergency alert message distribution".¹³⁵

- 144 Adding that the Alerting Governance Council would be "best positioned to provide a holistic view" of the regulations' effectiveness, the CRTC said that Pelmorex and the Alerting Governance Council "should provide this information in an annual report to the Commission to be filed by 31 May of each year, starting in 2016."¹³⁶

d Bilingual emergency alerts for bilingual communities

- 145 In considering Pelmorex' 2017 application to renew the Weather Network/MétéoMédia licences the Commission asked whether some BDUs were not distributing both its English-language and French-language services. Pelmorex noted that 725 BDU systems that served more than two million households did not carry both services.¹³⁷

- 146 In renewing Pelmorex' programming services from 2018 to 2023, the CRTC required BDUs to distribute both services to their subscribers in bilingual communities.¹³⁸ The alerting system "was extended to wireless devices in 2018".¹³⁹

IV Legislation, policy and regulation

- 147 In 2023, Parliament amended the 1991 *Broadcasting Act*. The new *Broadcasting Policy for Canada* retained the idea that Canada’s broadcasting system should “safeguard ... and strengthen the cultural, political, social and economic fabric of Canada” (subsection 3(1)(d)(i)).
- 148 The 2023 *Broadcasting Act* then also gives the CRTC the power in subsection 9.1(1) to
- ... in furtherance of its objects, make orders imposing conditions on the carrying on of broadcasting undertakings that the Commission considers appropriate for the implementation of the broadcasting policy set out in subsection 3(1), including conditions respecting
- ...
- (l) the carriage of emergency messages;
-
- 149 The 2023 *Act* retained In section 26(2) Cabinet’s ability to order the broadcast of programming considered “to be of urgent importance to Canadians generally or to persons resident in any area of Canada”.
- 150 The CRTC has not had and currently does not have a formal policy regarding public alerting in broadcasting. Instead it established a regulatory framework in 2014 to require the distribution of broadcast emergency alert messages. It published this framework in *Amendments to various regulations, the standard conditions of licence for video-on-demand undertakings and certain exemption orders - Provisions requiring the mandatory distribution of emergency alert messages*, [Broadcasting Regulatory Policy CRTC 2014-444 and Broadcasting Orders CRTC 2014-445, 2014-446, 2014-447 and 2014-448](#) (Ottawa, 29 August 2014).
- 151 The CRTC’s 2014 emergency alert amendments require the majority of conventional or over-the-air programming broadcasters to broadcast emergency alert messages received, aggregated and disseminated by the National Alert Aggregation and Dissemination System owned by Pelmorex Corporation. The CRTC’s regulatory framework requires broadcasting distribution undertakings (BDUs) such as cable and satellite services to overlay the emergency alert messages they receive on the programming of the services they distribute. The Commission has also required Pelmorex Weather Networks (Television) Inc. – the licensee of The Weather Network/MétéoMédia operates the NAAD System¹⁴⁰ – to submit reports about the System’s operations, effectiveness and governance.

V TBNOC 2025-180: response to CRTC questions

A *Distribution of alerts in both official languages*

Q1. In light of the revised CLF guidelines on the dissemination of emergency alerts in both official languages, is it reasonable and appropriate for the Commission to take additional measures, within its regulatory authority in the *Telecommunications Act* and the *Broadcasting Act*, to require LMDs to relay alerts in both English and French, when they are issued as such?

(a) If so, what regulatory measures should the Commission consider under the *Telecommunications Act* and the *Broadcasting Act*? For instance, should the Commission consider imposing new conditions of service under the *Telecommunications Act* and imposing new conditions of service and amended conditions of exemption orders under the *Broadcasting Act*?

152 As noted throughout FRPC’s intervention in this proceeding, the CRTC has not placed any evidence on the 2025-180 proceeding regarding the official languages in which emergency alerts have been or are being provided.

153 FRPC notes the comment filed by the Société de la francophonie manitobaine at the time of the previous intervention deadline of 14 October 2025), at pages 1-2:

Comme la FCFA, nous trouvons inacceptable que les services d’urgence assument, lorsqu’ils émettent des alertes par le biais du SNAP, que les francophones comprennent tous et toutes l’anglais. La population de langue française du Manitoba est de plus en plus diversifiée et inclut des personnes immigrantes qui peuvent avoir une moins bonne compréhension de l’anglais. Notre province attire par ailleurs de nombreux et nombreuses touristes d’expression française, du Québec ou d’ailleurs.”

Dans un pays qui compte deux langues officielles et qui s’est donné une Loi sur les langues officielles visant l’égalité réelle du français et de l’anglais, on ne saurait accepter que des communications d’urgence unilingues créent des risques pour la santé et la sécurité des francophones. C’est pourquoi la Société de la francophonie manitobaine a cosigné avec la FCFA une lettre aux ministres fédéral, provinciaux et territoriaux responsables de la Sécurité publique en amont de leur rencontre à Kananaskis dans quelques jours pour les saisir de cet enjeu.

154 The Forum considers that the CRTC not only has, but must have, jurisdiction to require broadcasting and telecommunications services to provide emergency alerts in both official languages, given the requirements in the *Official Languages Act* s. It must also ensure that emergency-alert messages are complete (and not cut off or abbreviated) when they are made available, regardless of the official language used, so that recipients have time to understand their meaning. Parliament added subsection 5.2(1) and (2) to the *Broadcasting Act* in 2023 for a

reason: it desires the CRTC not just to consider the impact of its decisions on OLMCs, but also to provide the OLMCs with relevant evidence (lacking, as it happens, in this proceeding's public record to date).

B Availability of alerts in Indigenous and other languages

Q2. Can and should the NPAS technically or operationally support the distribution of public alerts in languages other than English and French, including Indigenous languages? Specifically:

(a) Have EMOs considered whether, and how, to distribute public alerts in languages other than English and French using the NPAS? If not, why not – what challenges were identified to doing so?

(b) What is the feasibility, both technically and operationally, of the NPAS supporting additional languages? What technical barriers exist to supporting additional languages (e.g., language-specific character sets for alerting decoder devices, language-specific character sets for handsets, technical limitations of the NAAD System, Wireless Public Alerting [WPA] technical specifications, etc.)?

Q3. What role can the Commission play in facilitating the distribution of alerts in languages other than English and French, including Indigenous languages? Should the Commission take additional regulatory measures to support the distribution of alerts in languages other than English and French, including Indigenous languages?

155 FRPC may respond to this question in either of the two later phases of this proceeding.

C Accessibility of the NPAS

Q4. Are there barriers to the accessibility of public alerts for persons with disabilities in Canada? If so, how can the NPAS be improved and how can the Commission contribute to reducing or removing these barriers?

156 The Neil Squire study suggests that the NPAS does present barriers to the accessibility of emergency alerts. The NPAS could be improved by establish a working group (or CISC) that includes representatives of the accessibility community (whose expenses for participating in person or online, including interpretation) are paid by the Commission (or the Government of Canada).

D Technology gaps in wireless public alerting availability in Canada

Q5. How can the Commission help improve the availability of public alerts? Specifically:

(a) Where are the current gaps in accessing WPA in rural, remote, and Indigenous communities in Canada and how can such gaps be efficiently tracked?

(b) What is the feasibility, technically or otherwise, of creating and operating a national mobile application available for download across Canada, as a possible solution for reducing gaps in WPA?

(c) Should WSPs be required to provide alerting over 3G networks? What technical or economic challenges exist to doing so?

(d) How can the Commission improve the current reach of WPA to rural, remote, and Indigenous communities in Canada through regulatory measures? What other means should the Commission consider to support the distribution of public alerts to Canadians that are not currently served by WPA?

157 The CRTC is the sole agency empowered to obtain this information from broadcasters and telecommunications companies, and has apparently chosen not to do so for this proceeding.

158 The CRTC should invite the interveners in this proceeding for an in-person or online meeting to discuss evidentiary requirements.

E *Schedule for visible public test alerts*

Q6. Is the Commission's existing visible public alert testing framework, including the timing and frequency of visible test alerts, appropriate? Specifically:

(a) Is the biannual visible public alert test schedule still appropriate and in the public interest? Provide supporting rationale for why or why not and, if not, what changes are needed.

(b) Do EMOs, LMDs, and the NAAD System operator require further flexibility with regards to the timing and frequency of visible NPAS testing? If so, what new or modified regulatory measures are appropriate to enable that flexibility?

159 Before the CRTC makes decisions about this question it should replicate aspects of the Kantar study. In 2021 it found that "a majority agree that bi-annual tests are the right amount (6 or 7 on a 7-point scale; 69%" (page 6). Kantar concluded (page 8) that

Strong awareness of WPA and support for bi-annual tests suggest that the current regulatory measures are successful. However, lower awareness among younger and middle-aged Canadians (16-54) suggests that further education and awareness campaigns may be necessary for this cohort. Given that younger Canadians are less likely to use TV or radio as a source of information, education should come from WSPs or wireless alerts themselves.

F *Actively monitoring the status of the NPAS*

Q7. What are technical, regulatory, or other solutions that the Commission could implement to ensure that LMDs are connected to the NPAS and distribute alerts to the public? Specifically:

(a) What technical or other solutions could the Commission, the NAAD System, or the telecommunications and broadcasting industries implement to automatically detect and validate LMD connection to the NPAS?

(b) What tools (including regulatory measures) should the Commission use to streamline the verification and monitoring of LMDs' NPAS requirements? For instance, what kinds of standardized forms or evidence should LMDs provide to the Commission to demonstrate that they have established and are maintaining a connection with the NAAD System and disseminating alerts to the public in accordance with any applicable requirements?

160 The Forum may address this question in its reply. That said, the CRTC should include in its annual *Departmental Reports* statistics that describe the number of alerts issued successfully as well as the number that failed to be distributed (by medium [wireless, AM/FM/TV, BDUs) showing in each case the results by province (distinguishing between urban and rural centres, as well as OLMC and Indigenous populations), and including results for previous years (to show changes over time).

161 The Forum also notes the statement at paragraph 22 of 2025-180: "... persons without access to WPA may still be able to receive public alerts through broadcasting undertakings or other means" The Commission may well be correct.

162 That said, the data describing actual alerts sent from January to December 2024 and from January to October 2025⁷ do not support this claim because 63.4% of the wireless alerts issued in this 26-month period were wireless-only alerts:

Table 3 Number, percentage and medium of alerts issued from January 2024 to October 2025

Criteria for emergency alerts:	Broadcast & wireless	Broadcast only	Wireless only	Total	Wireless only as a % of total
<ul style="list-style-type: none"> • Immediate, • Extreme or Severe • And Observed or Likely 					
Immediate, Extreme & Likely	No results				
Immediate, Severe & Likely					
Immediate, Extreme & Observed	604	3	1120	1727	64.9%
Immediate, Severe & Observed	13	2	24	39	61.5%
Did not meet criteria	38			38	0.0%
Total	655	5	1144	1804	63.4%
% of total	36.3%	0.3%	63.4%	1	

⁷ See Archived Public Safety Messages, <https://alertsarchive.pelmorex.com/en.php>



Appendices

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Appendix 1 Part 1 Application number

CRTC: accusé de réception // CRTC: acknowledgement of delivery



From <no-reply@crtc.gc.ca>
To <execdir@frpc.net>
Date 2024-04-17 8:48 am

Le CRTC a reçu la demande suivante:

Type de Licence: **Politique**

Catégorie: **Modification à la licence**

Description: **Part 1 application asking CRTC to renew its approach to broadcasting and the National Public Alerting System**

Veuillez utiliser le numéro de référence **2024-0194-1** pour toutes communications avec le CRTC au sujet de cette demande.

The CRTC has received the following application:

Type of Licence: **Policy**

Category: **Amendment to licence**

Description: **Part 1 application asking CRTC to renew its approach to broadcasting and the National Public Alerting System**

Please use the reference number **2024-0194-1** for all correspondence with the CRTC regarding this application.



Appendix 2 CRTC staff's 13 June 2024 letter denying process



13-June-2024

BY EMAIL

Monica. L. Auer, M.A., LL.M.
Executive Director
Forum for Research and Policy in Communications (FRPC)
Ottawa, Ontario
execdir@frpc.net

Subject: Application submitted by FRPC regarding emergency alerts and the National Public Alerting System

Thank you for your letter dated 28-March-2024 which was filed as an application under Part 1 of the CRTC Rules of Practice and Procedures (CRTC Rules). In the letter, the Forum for Research and Policy in Communications (FRPC) requests that the CRTC inquire into issues relating to emergency alerts and the National Public Alerting System (NPAS).

CRTC staff acknowledges and appreciates the FRPC's significant efforts to provide detailed research in respect of these matters to the Commission's attention. Staff notes that Public Safety Canada is the lead department for emergency management planning and the governance of NPAS through its position on SOREM¹ alongside other federal, provincial, and territorial governments.

The Commission nevertheless plays a key role in supporting the safety and security of Canadians by ensuring that they have access to public alerts through robust broadcasting and telecommunications systems that adequately warn them about imminent or possible dangers to life in emergency situations. The CRTC's role in the NPAS also includes ensuring that radio and television stations, television service providers, and wireless service providers (WSPs), collectively known as last-mile distributors (LMDs), disseminate public alerts so that Canadians can take appropriate action during emergencies.

CRTC staff would like to bring to your attention the following initiatives that have been undertaken to improve the dissemination of alerts to Canadians, some of which relate to concerns raised in your report:

- Reducing the disruptive impact, occurrence, and length of service outages, and ensuring that essential services such as 9-1-1 and emergency alerts are available when needed².

¹ Senior Officials Responsible for Emergency Management is the F/P/T coordinating body that works to harmonize and improve emergency response practices of Emergency Management Organizations across the country

² [In February 2023](#), the CRTC launched a consultation to explore how telecommunications providers should report major service outages to the CRTC and other authorities, including those that impact public alerts



Ottawa, Canada
K1A 0N2

- Revising the CRTC web page on emergency alerts and the NPAS³ to provide more information to Canadians including relevant reports and frequently asked questions.
- Working actively with the CRTC's Client Services staff to ensure they provide Canadians with the most up-to-date information concerning NPAS.
- Conducting investigations into alerting matters and improving transparency in this regard by publishing relevant correspondence on the CRTC's website⁴.
- Initiating a notice of consultation concerning the Co-development of an Indigenous Broadcasting Policy⁵ that asks specific questions about how the NPAS, within the Canadian broadcasting system, can better serve Indigenous audiences.
- Administrative renewal of Pelmorex's licence and mandatory distribution order⁶, including terms regarding the operation of the NAAD system, from 01-Sep-2023 to 31-Aug-2026.⁷

At this point in time, while we are not able to make any firm announcements, staff is planning a proceeding on public alerting for the very near future. We invite you to participate in this upcoming proceeding and will alert you to its publication.

Given that your letter is requesting that we hold a proceeding and does not request any other specific regulatory measures, we will not treat your letter pursuant to Part 1 of the CRTC Rules.

Should you need further information, please do not hesitate to contact [REDACTED] the Manager of Network Technology, by telephone at [REDACTED] or at the following email address [REDACTED]@crtc.gc.ca.

Thank you for your time and work.

Regards,

[REDACTED]

[REDACTED]

A/Director, Financial and Multiplatform Technology Analysis
Canadian Radio-television and Telecommunications Commission

³ [Emergency Alerts and the National Public Alerting System](#)

⁴ [General Information - NPAS Matters: 8000-C12-202306860 | CRTC](#)

⁵ [Broadcasting Notice of Consultation CRTC 2024-67 | CRTC](#)

⁶ [Broadcasting Decision CRTC 2023-245 | CRTC](#)

⁷ The CRTC will consider the substantive issues related to Pelmorex's service at a later date. When the CRTC launches the review of Pelmorex's licence and mandatory distribution order, all interested persons will have an opportunity to share their views.



Appendix 3 CRTC's 14 June 2024 webmail return of application (redacted)

Return of application (Application 2024-0194-1)



From Broadcasting SWAT <BroadcastingSWAT@crtc.gc.ca>
To execdir@frpc.net <execdir@frpc.net>
Date 2024-06-14 10:22 am

Dear Monica Auer,

This is with reference to application 2024-0194-1 by the Forum for Research and Policy in Communications to inquire into issues relating to emergency alerts and the National Public Alerting System.

As per the letter sent Isabelle Aris by dated 13 June 2024, this application is now considered closed and the Commission has disposed of all related documents.

Should you need further information concerning this application, please do not hesitate to contact [REDACTED] by telephone [REDACTED] or at the following email address [REDACTED]@crtc.gc.ca.

[REDACTED]
Superviseur de l'équipe du point de contact unique | Single Point of Contact Supervisor
Conseil de la Radiodiffusion et des Télécommunications Canadiennes (CRTC) | Gouvernement du Canada
Canadian Radio-television and Telecommunications Commission (CRTC) | Government of Canada
1, promenade du portage, Gatineau, QC, J8X 4B1
[REDACTED]s@crtc.gc.ca / Tél [REDACTED]



Appendix 4 CRTC's 9 October 2024 letter stating FRPC cannot ask Commission to begin a consultation

Broadcasting - Secretary General Letter addressed to Monica L. Auer (Forum for Research and Policy in Communications)

[Ottawa, 9 October 2024](#)

BY E-MAIL

Monica L. Auer, M.A., LL.M.
Executive Director
Forum for Research and Policy in Communications (FRPC)
Ottawa, Ontario
execdir@frpc.net

Subject: Secretary General Letter – Letter submitted by FRPC regarding emergency alerts and the National Public Alerting System

Thank you for your letter dated 29 July 2024. The Commission appreciates the FRPC's thorough research and involvement in topics relating to the National Public Alerting System (NPAS). The Commission's role with respect to NPAS is to ensure Canadians have access to public alerts through the broadcasting and telecommunications systems to warn them about imminent or possible dangers to life in emergency situations.

The Commission has reviewed the initial FRPC letter (dated 28 March 2024) and concludes by majority decision that it is not an application for the purposes of the CRTC Rules of Practice and Procedure (the Rules). As set out in [Broadcasting and Telecom Information Bulletin CRTC 2010-959](#), an "applicant" is someone "who asks the Commission to make a decision, whether on a matter specific to the circumstances, like a new licence or a tariff, or on a more general policy issue." In the Commission's view, these are examples of requests that the Commission exercise a statutory authority based on its deliberations, which is the core attribute that defines an application. In light of this, the Commission considers that the FRPC's letter should be viewed as a request to initiate a broad proceeding on a wide range of policy matters rather than an application. While the Commission has the discretion to undertake broad-based inquiries, the Rules, in particular regarding applications, do not authorize persons to request the issuance of such a notice of consultation.

A notice of consultation on public alerting is among the CRTC's planned consultations for this winter. The notice will seek comments from the public on several issues identified in your initial letter. We look forward to your participation.

Yours sincerely,

Marc Morin
Secretary General



Appendix 5 *Regulatory Plan to modernize Canada's Broadcasting Framework*
published by the CRTC on its public website

Regulatory Plan to modernize Canada's broadcasting system

This plan explains how the CRTC will work with Canadians to modernize Canada's broadcasting system. Modernization will take place in three phases.

The CRTC will adapt its approach in light of any future policy direction.

▼ Phase 1

➔ Spring 2023

- April 27: *Online Streaming Act* (Bill C-11) receives Royal Assent.
- May 8: CRTC publishes its Regulatory Plan.
- CRTC will publish an Information Bulletin clarifying technical details for broadcasters.

○ Public consultations

- Consultation on contributions to the Canadian broadcasting system: This consultation will consider who should contribute, how much and how.
- Consultation on registration of online streaming services: This consultation will consider which online streaming services will need to be registered with the CRTC.
- Consultation on exemption orders and basic conditions of service: This consultation will consider changes to orders under which online services have operated in Canada.
- There may be additional consultations, including on establishing a new fund to provide financial support for participation in CRTC proceedings by persons and groups representing the public interest.

▼ Phase 2

○ Fall 2023

Public consultations

- Consultation on fee regulations: This consultation will review fees paid by broadcasters and how they should be extended to online undertakings.

Other activities

- CRTC publishes updated version of its Regulatory Plan.
- Engagement on definitions of Canadian and Indigenous content: These preliminary engagement sessions with industry and creators will help design the approach for a full public consultation.

○ Winter 2023-2024

Public consultations may include

- Consultation on definitions of Canadian and Indigenous content: This consultation would review the definition of Canadian content and examine possible changes.
- Consultation on tools to support Canadian music and other audio content: This consultation would assess tools to support Canadian audio content.
- Consultation on programming and supports for video content: This consultation would assess tools to develop, support, and promote Canadian and Indigenous content on all platforms.
- Consultation on local markets access and competition: This consultation would evaluate market access, news and local programming, and competitive behaviours.
- Consultation on protecting Canadian consumers: This consultation would review ways to protect consumers and include broadcaster codes of conduct and mechanisms for complaints.

▼ Phase 3

○ Targeting launch: Late 2024

- This phase will focus on implementing policy decisions listed above. More on Phase 3 will be included in future updates of this plan.

Open and public process

Modernizing Canada's broadcasting system will require multiple steps. Every step will include open and public consultations.

Our approach

Changes needed to implement the modernized *Broadcasting Act* are substantial and complex. There are many interconnected issues to be addressed.

Implementing the modernized Act will be done in three phases. We will make decisions based on consultations. We will adjust our plans as needed. As a result, this plan will be updated regularly to ensure that everyone can participate and share ideas.

Phase 1: Getting started (launching spring 2023)

The broadcasting system of the future will ensure that online streaming services make meaningful contributions to Canadian and Indigenous content. Creators will have opportunities to tell their stories and Canadians will have access to a greater variety and diversity of content.

We will:

- consult on a registration requirement for certain online streaming services;
- review exemption orders and possible basic conditions of service; and
- start to develop a framework for contributions that will apply to traditional broadcasters and online streaming services.

► **Consultation on contributions to the Canadian broadcasting system**

► **Consultation on registration of online streaming services**

► **Consultation on exemption orders and basic conditions of service**

Phase 2: Building a new regulatory framework (launching fall 2023)

In this phase, we will look at how we could tailor our expectations of and requirements for different broadcasting services, including:

- Definitions of Canadian and Indigenous content;

- Our approach to licensing;
- Funding to improve public participation in broadcasting processes;
- Audio-related support, such as contributions for music and spoken-word programming;
- Mechanisms, such as incentives and regulatory measures, that could be used to:
 - support emerging talent
 - foster creation, production, distribution, promotion, and discoverability of diverse content
- Supports for news and local programming;
- Market access and other power imbalances;
- Fair negotiations, ownership, and dispute resolution;
- Improving protections for consumers; and
- Broadcasting industry fees.

Phase 3: Implementing new regulatory framework (targeting launch late 2024)

Phase 3 will focus on implementing the new regulations and policy decisions. More information will follow.

Related information

- [Myths and Facts about Bill C-11, the *Online Streaming Act*](#)

Date modified:

2023-05-08



Appendix 6 *Regulatory Plan to modernize Canada's broadcasting system*
(modified 8 November 2024)



Regulatory plan to modernize Canada's broadcasting framework

This plan explains how the CRTC will work with Canadians and Indigenous peoples to modernize Canada's broadcasting framework. The changes needed to implement the modernized *Broadcasting Act* are substantial and complex, with many interconnected issues to be addressed.

The modernized Act will be implemented in three phases. Decisions will be made based on the consultations. This plan will be updated regularly to ensure that everyone can participate and share ideas.

▼ Phase 1—Getting started (completed)

Phase 1 lays the groundwork for future policy work and determines whether online streaming services need to make initial financial contributions to support Canada's broadcasting system.

✓ Spring 2023

- April 27: *Online Streaming Act* (Bill C-11) receives Royal Assent.
- May 8: CRTC publishes its Regulatory Plan.
- May 12: CRTC publishes an [Information Bulletin](#).
- [Consultation on contributions to the Canadian broadcasting system](#)
This consultation considered who should contribute, how much, and how. It focused on whether there should be an initial base contribution made by online streaming services in the system to support Canadian and Indigenous content.
Status: [Decision issued](#). See the [final conditions of service](#).
- [Consultation on registration of online streaming services](#)
This consultation considered which online streaming services need to be registered with the CRTC, how this should be done and helped define who will not need to register.
Status: [Decision issued](#). See [list of registered online streaming services](#).
- [Consultation on exemption orders and basic conditions of service](#)
This consultation considered changes to some basic conditions of service and orders under which online services have operated in Canada.

Status: Decision issued

▼ Phase 2—Building a new regulatory framework (in progress)

This phase looks at the policy issues for the new regulatory framework and will include the following public consultations and hearings.

✓ Summer/Fall 2023

- Consultation on fees regulations

This consultation reviewed the regulatory fees paid by Canadian broadcasters and how they should be extended to online streaming services.

Status: Decision issued

✓ Winter 2024

- **Engagement on definitions of Canadian content**

These preliminary engagement sessions with industry and creators will help design the approach for a future public consultation.

Status: Completed. See the “What we heard” report from these sessions.

✓ Spring 2024

- Consultation on Indigenous broadcasting policy

The CRTC is co-developing with Indigenous peoples a modernized Indigenous broadcasting policy. This consultation gathered views on how to support Indigenous broadcasters and content creators, and ensure Indigenous stories and voices are represented, easily found and shared across all platforms (both traditional and online). Indigenous content definitions will also be co-determined through this process.

Status: Closed for comments. This was the first consultation in a multi-step co-development process. There may be additional consultations in early 2025, as needed.

Other activity:

- Announced the creation of Indigenous Relations Team. This new team will support Indigenous participation in CRTC proceedings and will ensure the distinct nature and lived experiences of Indigenous peoples are considered across the CRTC’s work.

➔ Summer 2024

- Consultation on closed captioning

This consultation studies how Canadians who rely on closed captioning can have access to barrier-free programming on traditional and online platforms. We accept comments in American Sign Language (ASL) and *Langue des signes québécoise* (LSQ).

Status: Open from September 10 to November 13, 2024.

- Consultation on described video and audio description

This consultation studies how Canadians who rely on described video and audio description can have access to barrier-free programming on traditional and online platforms.

Status: Open from September 19 to November 20, 2024.

- Consultation on the Independent Local News Fund (ILNF)

This consultation reviewed the fund's eligibility criteria and allocation method to ensure a fair, simple, and appropriate distribution of funds to current and future recipients.

Status: Closed for comments.

- Consultation on Official Language Minority Communities (OLMC) and official languages

This consultation will explore ways in which the CRTC can strengthen its consultation and engagement practices in proceedings relating to OLMC and official languages.

Status: Closed for comments

Other activities:

- Published the list of registered online streaming services.
- Continue to strengthen the CRTC's commitment to official languages, consistent with the modernized Act and the *Official Languages Act*.

➔ Fall 2024

- Consultation on a fund to support local news production by commercial radio

This consultation will consider the creation of a temporary fund that would support local news production by commercial radio stations outside of the major designated markets of Montreal, Toronto, Vancouver, Calgary, Edmonton, and Ottawa-Gatineau.

Status: open from November 4 to December 19, 2024.

- **Consultation on public interest participation**

This consultation will explore new ways to fund the participation of groups that represent the public interest in CRTC proceedings.

Other activities:

- Release a report on what we learned during the preliminary engagement sessions on the definitions of Canadian content.

⋮ **Winter 2024–2025**

- **Consultation on structural relationships**

This consultation will examine the relationships between small, medium, and large players in traditional broadcasting and online streaming. The CRTC will look at the tools currently in place and what tools it might use in the future.

A public hearing will follow.

⋮ **Spring 2025**

- **Consultation on definitions of Canadian audiovisual content**

This consultation will examine the CRTC's definition of Canadian content for television and online programming.

A public hearing will follow.

- **Consultation on audio content**

This consultation will look at all aspects of radio and audio streaming services in Canada. The CRTC will examine issues including how to support the industry, support Canadian music, how to define audio content, and what regulatory obligations should exist.

A public hearing will follow.

- **Consultation on news programming**

This consultation will study how to ensure everyone has access to strong, high quality and diverse local and national news programming on TV, radio and online in Canada.

A public hearing will follow.

⋮ **Winter 2025–2026**

- **Consultations on inclusion and diversity**

The CRTC will hold a series of consultations to look at how the broadcasting system can better reflect the experiences of all people in Canada and foster access to diverse voices and perspectives.

Spring 2026

- **Consultation on the CRTC Rules of Practice and Procedure**

This consultation will review the current Rules of practices and procedures, which govern CRTC proceedings, so that they are more agile, easier to understand and more efficient.

▼ **Phase 3—Implementing new regulatory framework (targeting launch late 2025)**

This phase will focus on implementing the policy decisions listed above.

The CRTC will finalize the contributions online streaming services and traditional broadcasters will have to make to support Canadian and Indigenous content. We will also start to issue conditions of service that reflect how each radio station, television service and online streaming service should support the goals of the broadcasting system.

More details on Phase 3 will be included in future updates to this plan.

Date modified:

2024-11-08



**Appendix 7 *Regulatory Plan to modernize Canada’s broadcasting system* (modified
15 November 2024)**



Regulatory plan to modernize Canada's broadcasting framework

The CRTC is moving quickly to implement the modernized *Broadcasting Act*. This regulatory plan sets out the consultations and public hearings the CRTC is advancing to modernize Canada's broadcasting framework.

Key themes

- [High-quality Canadian content](#)
- [A sustainable broadcasting system](#)
- [Clear and predictable rules](#)

Ongoing and upcoming consultations and public hearings

Fall 2024

➔ [Consultation on closed captioning](#)

[High-quality Canadian content](#)

➔ [Consultation on described video and audio description](#)

[High-quality Canadian content](#)

➔ [Consultation on Canadian television content](#)

[High-quality Canadian content](#)

➔ [Consultation on the modernization of radio processes](#)

[A sustainable broadcasting system](#)

[Clear and predictable rules](#)

➔ [Consultation on a fund to support local news production by commercial radio](#)

[A sustainable broadcasting system](#)

➔ Consultation on market dynamics and sustainability

| A sustainable broadcasting system

Winter 2025

➔ Consultation on audio policy

| A sustainable broadcasting system

➔ Consultation on public interest participation

| Clear and predictable rules

Spring 2025

➞ Public hearing on Canadian television content

High-quality Canadian content

➞ Public hearing on market dynamics and sustainability

A sustainable broadcasting system

➞ Public hearing on audio policy

A sustainable broadcasting system



Explore the full activity calendar

Discover the timeline of present and future activities related to the implementation of the modernized *Broadcasting Act*.

High-quality Canadian content

High-quality Canadian content includes news, dramas, comedies, documentaries and other types of programming, including French-language programming. The consultations under this theme focus on ensuring that Canadians can easily find, watch, and listen to diverse Canadian and Indigenous content. Consultations will also focus on improving access to Canadian stories and voices across traditional and online platforms.

Ongoing activities

➔ Consultation on Canadian television content

This consultation examines how to modernize the CRTC's definition of Canadian content for television and online programming, and support for Canadian content, including news.

Status: Open from November 15, 2024 to January 20, 2025.

➔ Consultation on described video and audio description

This consultation studies how Canadians who rely on described video and audio description can have access to barrier-free programming on traditional and online platforms.

Status: Open from September 19 to November 20, 2024.

➔ Consultation on closed captioning

This consultation studied how Canadians who rely on closed captioning can have access to barrier-free programming on traditional and online platforms.

Status: Open from September 10 to November 13, 2024.

Upcoming activities

⋯ Research on discoverability

This third-party study, to be commissioned by the CRTC, will examine how Canadians find and discover content on traditional and online platforms. This study will form part of the record of the proceedings on tailored conditions of service.

Status: Planned for Winter 2025

⋯ Consultation on tailored conditions of service

This consultation will finalize the individual contributions and requirements for traditional and online platforms in Canada. These contributions and requirements will be established based on the findings of previous modernized *Broadcasting Act* consultations.

Status: Planned for late 2025

⋯ Consultation on diversity and inclusion

The CRTC will hold a series of consultations to look at how the broadcasting system can better reflect the experiences of all people in Canada and foster access to diverse voices and perspectives.

Status: Planned for late 2025

▼ What we have done

✓ Consultation on Indigenous broadcasting policy

This co-development process with First Nations, Inuit and Métis is a multi-phase consultation to gather views on how to support Indigenous broadcasters and creators, and ensure Indigenous stories and voices are represented, easily found and shared across all platforms (both traditional and online). Indigenous content definitions will also be co-developed through this process.

Status: Closed for comments. This consultation ran from March 22 to July 22, 2024.

✓ Consultation on official language minority communities (OLMC) and official languages

This consultation explored ways in which the CRTC can strengthen its consultation and engagement practices in proceedings relating to OLMC and official languages.

Status: Closed for comments. This consultation ran from September 9 to October 9, 2024 and until November 8, 2024 for members of OLMCs.

A sustainable broadcasting system

The consultations under this theme explore how our broadcasting system can be financially resilient and capable of adapting to technological advancements and changing market dynamics. A system in which broadcasters contribute to the broadcasting system in the most effective and appropriate way. And a system that ensures continued support for Canadian and Indigenous programming, while promoting fair competition, diversity and innovation.

Ongoing activities

➞ Consultation on the modernization of radio processes

This consultation examines proposals to provide traditional radio broadcasters with more flexibility while reducing administrative burden.

Status: Open from November 15, 2024 to January 20, 2025.

➞ Consultation on a fund to support local news production by commercial radio

This consultation considers the creation of a temporary fund that would support local news production by commercial radio stations in smaller markets outside of Montreal, Toronto, Vancouver, Calgary, Edmonton, and Ottawa-Gatineau.

Status: Open from November 4 to December 4, 2024.

Upcoming activities

⋯ Consultation on market dynamics and sustainability

This consultation will focus on the sustainability of Canada's broadcasting system by examining the market dynamics between small, medium, and large players operating traditional and online platforms, and access to the system by a diversity of players, including rules to foster equitable participation and dispute resolution.

Status: Planned for Fall 2024

⋯ Research on discoverability

This third-party study, to be commissioned by the CRTC, will examine how Canadians find and discover content on traditional and online platforms. This study will form part of the record of the proceedings on tailored conditions of service.

Status: Planned for Winter 2025

⋯ Consultation on audio policy

This consultation will look at certain aspects of the radio and audio industry in Canada, including how to support Canadian music and other audio programming. It will also look at how audio players contribute equitably and meaningfully to the strength and diversity of the Canadian broadcasting system and what regulatory obligations should exist.

Status: Planned for Winter 2025

▼ What we have done

✓ Independent Local News Fund

This consultation reviewed the fund's eligibility criteria and allocation method to ensure a fair, simple, and appropriate distribution of funds to current and future recipients.

Status: Closed for comments. This consultation ran from July 23 to September 6, 2024.

✓ Base contributions to the Canadian broadcasting system

The consultation focused on whether there should be a base contribution made by online streaming services in the broadcasting system to support Canadian and Indigenous content. It considered which online streaming services should contribute, how much, and how.

Status: Decision issued. This consultation ran from May 12, 2023 to July 11, 2023.

Clear and predictable rules

The consultations under this theme focus on establishing a transparent framework for traditional and online platforms, ensuring fairness and consistency in the regulatory environment. Clear and predictable rules will facilitate informed decision-making, promote compliance, and help all stakeholders understand their rights and responsibilities within the broadcasting system.

Ongoing activities

➞ Consultation on the modernization of radio processes

This consultation examines proposals to provide traditional radio broadcasters with more flexibility while reducing administrative burden.

Status: Open from November 15, 2024 to January 20, 2025

Upcoming activities

⋯ Consultation on public interest participation

This consultation will explore new ways to fund the participation of groups that represent the public interest in CRTC proceedings.

Status: Planned for Winter 2025

⋯ Consultation on tailored conditions of service

This consultation will finalize the individual contributions and requirements for traditional and online platforms in Canada. These contributions and requirements will be established based on the findings of previous modernized *Broadcasting Act* consultations.

Status: Planned for late 2025

▼ What we have done

✓ Registration of online streaming services

This consultation considered how the registration of online streaming services should be done and identified who will not be required to register.

Status: Decision issued. This consultation ran from May 12, 2023 to June 12, 2023.

✓ Exemption orders and basic conditions of service

This consultation considered whether certain exemption orders relating to online services should be repealed, amended or replaced, and whether to impose basic conditions of service on certain online services operating in Canada.

Status: Decision issued. This consultation ran from May 12, 2023 to June 12, 2023.

✓ Broadcasting fees

This consultation reviewed the regulatory fees paid by Canadian broadcasters and how they should be extended to online streaming services.

Status: Decision issued. This consultation ran from August 23, 2023 to September 22, 2023.

✓ Consultation on official language minority communities (OLMC) and official languages

This consultation explored ways in which the CRTC can strengthen its consultation and engagement practices in proceedings relating to OLMC and official languages.

Status: Closed for comments. This consultation ran from September 9 to October 9, 2024 and until November 8, 2024 for members of OLMCs.

Date modified:

2024-11-15



**Appendix 8 *Regulatory Plan to modernize Canada’s broadcasting system (modified
18 November 2025)***



Regulatory plan to modernize Canada's broadcasting framework

The CRTC is moving quickly to implement the modernized *Broadcasting Act*. This regulatory plan sets out the consultations and public hearings the CRTC is advancing to modernize Canada's broadcasting framework.

Key themes

- [High-quality Canadian content](#)
- [A sustainable broadcasting system](#)
- [Clear and predictable rules](#)

Ongoing and upcoming consultations and public hearings

Spring 2025

➔ [Consultation on public interest participation](#)

[Clear and predictable rules](#)

➔ [Public hearing on Canadian content for TV and online streaming services](#)

[High-quality Canadian content](#)

➔ [Public hearing on market dynamics and sustainability](#)

[A sustainable broadcasting system](#)

Summer 2025

➞ Public hearing on audio policy

| A sustainable broadcasting system

Fall 2025

➞ Report on discoverability

| High-quality Canadian content

| Clear and predictable rules

➞ Tailored conditions of service

| High-quality Canadian content

| Clear and predictable rules



Explore the full activity calendar

Discover the timeline of present and future activities related to the implementation of the modernized *Broadcasting Act*.

High-quality Canadian content

High-quality Canadian content includes news, dramas, comedies, documentaries and other types of programming, including French-language programming. The consultations under this theme focus on ensuring that Canadians can easily find, watch, and listen to diverse Canadian and Indigenous content. Consultations will also focus on improving access to Canadian stories and voices across traditional and online platforms.

Upcoming activities

⋮ Research on discoverability

This third-party study, to be commissioned by the CRTC, will examine how Canadians find and discover content on traditional and online platforms. This study will form part of the record of the proceedings on tailored conditions of service.

Status: Planned for Fall 2025

⋮ Consultation on tailored conditions of service

This consultation will finalize the individual contributions and requirements for traditional and online platforms in Canada. These contributions and requirements will be established based on the findings of previous modernized *Broadcasting Act* consultations.

Status: Planned for late 2025

⋮ Consultation on diversity and inclusion

The CRTC will hold a series of consultations to look at how the broadcasting system can better reflect the experiences of all people in Canada and foster access to diverse voices and perspectives.

Status: Planned for late 2026 to early 2027

► What we have done

A sustainable broadcasting system

The consultations under this theme explore how our broadcasting system can be financially resilient and capable of adapting to technological advancements and changing market dynamics. A system in which broadcasters contribute to the broadcasting system in the most effective and appropriate way.

And a system that ensures continued support for Canadian and Indigenous programming, while promoting fair competition, diversity and innovation.

Upcoming activities

⋯ Research on discoverability

This third-party study, to be commissioned by the CRTC, will examine how Canadians find and discover content on traditional and online platforms. This study will form part of the record of the proceedings on tailored conditions of service.

Status: Planned for Fall 2025

► What we have done

Clear and predictable rules

The consultations under this theme focus on establishing a transparent framework for traditional and online platforms, ensuring fairness and consistency in the regulatory environment. Clear and predictable rules will facilitate informed decision-making, promote compliance, and help all stakeholders understand their rights and responsibilities within the broadcasting system.

Upcoming activities

⋯ Consultation on tailored conditions of service

This consultation will finalize the individual contributions and requirements for traditional and online platforms in Canada. These contributions and requirements will be established based on the findings of previous modernized *Broadcasting Act* consultations.

Status: Planned for late 2025

► What we have done

Date modified:

2025-11-18



Appendix 9 CRTC's 21 November 2025 staff letter to FRPC



Ottawa, 21 November 2025

BY E-MAIL

Monica L. Auer, M.A., LL.M.
Executive Director
Forum for Research and Policy in Communications (FRPC)
Ottawa, Ontario
execdir@frpc.net

**Subject: Telecom and Broadcasting Notice of Consultation CRTC
2025-180, Call for comments - Improving the public alerting system — Procedural
Request Submitted by FRPC**

Thank you for your correspondence of 05 November 2025, in which you made a procedural request in the above-referenced proceeding for the Commission to:

- change the focus of the Notice of Consultation 2025-180 (the NoC) in light of the proposal on Renewing Canada's National Public Alerting System (NPAS) set out in the recent federal budget, [Budget 2025 - Canada Strong](#), and extend the timeline to comment in the proceeding;
- add to the public record of the proceeding the relevant studies, research reports, or information the CRTC has undertaken since 2014 related to the emergency alert system; and
- add a public hearing and preparatory conference to the NoC 2025-180 process.

Your procedural request asks for the Commission to consider completely redesigning the NPAS and to consider federal government proposals for the NPAS as set out in the Budget 2025. However, the Commission's proceeding focuses on the following targeted improvements to the NPAS:

- the accessibility of the NPAS for persons with disabilities;
- the language of alerts in the NPAS - official languages, Indigenous and additional languages;
- potential wireless public alerting gaps across the country;
- the test schedule for public alert tests; and
- possible measures the Commission could implement to monitor the system's status more effectively.

The NoC sets out the scope of the issues to be considered in this proceeding, and a complete redesign of the NPAS is out of the scope of this proceeding. The details of the federal government proposals for the NPAS are unknown at this time and in staff's view, it would be premature to propose altering the scope of the proceeding at this time.

CRTC staff notes that the Commission regularly publishes information about the NPAS, as referenced below, which any interested person can consult at any time and raise in their submissions:

- [Location of Broadcast and Wireless Emergency Alert Distributors | CRTC](#) incorporates the data sets and maps of the entities that report on compliance relating to the NPAS in annual surveys.
- [National Public Alerting System – Implementation Summary - Open Government Portal](#) provides summary of staff's analysis on annual survey data for compliance relating to NPAS.
- [Departmental Results Report 2023-24 | CRTC](#) provides summary of departmental annual compliance targets and actual result reports (which address departmental results relating to public alerting).
- Staff reviews and investigates public inquiries related to [NPAS matters in Telecom and Broadcasting](#).

In light of the above, Commission staff is of the view that there is no need to change the scope, timeline or procedures of this proceeding.

Commission staff takes note of you requested areas for further inquiry. Staff will keep these in mind when recommending further proceedings to the Commission.

Yours sincerely,

Simon Levasseur
Director, Financial and Multiplatform Technology Analysis
Canadian Radio-television and Telecommunications Commission



Appendix 10 West Hants Regional Municipality letter of 9 August 2023



August 9, 2023

To Innovation, Science, and Economic Development Canada

Innovation, Science and Economic Development Canada
C.D. Howe Building
235 Queen St
Ottawa ON
K1A 0H5

Canadian Radio-Television and Telecommunications Commission (CTRC)

Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
Canada,
K1A 0N2

and Telecommunication Providers (Bell)

Subject: Improved Cell (Mobility) Service and Coverage

Through this correspondence the West Hants Regional Municipality and its Council would like to express the need for improved mobility service in the West Hants Regional Municipality. At the June 29th, 2023 Council meeting, the following recommendation was approved expressing Council's concern regarding this matter.

MOVED BY COUNCILLORS M. MCLEAN AND SMITH THAT COUNCIL DIRECT STAFF TO WRITE A LETTER TO THE PROPER ORGANIZATIONS ABOUT THE POOR CELL SERVICE IN WEST HANTS REQUESTING THAT PROVIDERS EXPLORE ALL OPTIONS THAT WOULD RESULT IN INCREASED CELLULAR SERVICE FOR WEST HANTS. MOTION CARRIED.

The Municipality recognizes the increased demands on mobility services and the existing infrastructure with today's wide range of users and applications. However, there are many areas within the municipality such as Brooklyn, Ellershouse, and Vaughan where calls are frequently dropped or cannot be made resulting in concern over public safety should an emergency arise.

Since the release of Canada's connectivity strategy by the Office of the Auditor General of Canada in 2019, we were told that "mobile cellular coverage has improved". However, a 2023 report (1 of 4) done by the Auditor General of Canada to the Parliament of Canada tells a different tale. Take a one-hour drive northwest of Halifax, you will experience the "digital divide", that still exists between urban Nova Scotia and the rural areas of West Hants, and our neighbouring Glosscap First Nation reserve.

In 2019, correspondence was sent regarding the unreliability of cellular service in the West Hants area, particularly the unavailability of the 911 system. With little response received, the West Hants Regional Municipality is once again calling for action to address this safety concern. Residents and Emergency services rely on cellphones to alert people of dangers. We need Governments and regulators to address connectivity dead zones across our region.

Given the tragic events experienced in Nova Scotia the last few years; Portapique tragedy, Nova Scotia Wildfires and specifically, the massive flooding triggered by widespread rainstorms in West Hants, the urgency to have communications available to all of our residents is CRITICAL.

During the July 21, 2023 torrential downpour and persistent thunder and lightning event, many were left with no access to telecommunications. Residents and emergency crews within West Hants were unable to have access to acceptable cellular service without calls being completed or dropped due to poor service levels. There is no question telecommunications need to improve.

Canada's connectivity strategy stated, "being connected is no longer a luxury but a basic essential service. Can you imagine being stranded in a flash flood and not being able to call for help? Can you imagine trying to coordinate a search for missing persons and having little to no cell coverage.

West Hants Regional Municipality is requesting the Canadian Radio-television and Telecommunications Commission (CRTC) step in to address greater regulations within the industry for performance standards.

The Municipality would like to assist in any way it can with improving mobility services. We will start by inviting you to participate in an information exchange regarding the current service coverage you offer, what challenges you are facing, and how improvements can be made to the overall service. For example, we have had past engagements with specific carriers to assist with site locations for cell tower installations. We would be open to discussing such matters and others.

I thank you for your time in reviewing this letter and assume you have mutual interest in improving services. At your convenience, please reach out to me so that we might establish a dialogue.

Yours truly



Mark Phillips
Chief Administrative Officer

Attachment: 2019-10-21 Letter to CRTC Re Reliable Cell and Land-line service

mp/ds

cc:

The Honourable Chrystia Freeland, Deputy Prime Minister of Canada

The Honourable Francois-Philippe Champagne, Minister of Innovation, Science and Industry of Canada

The Honourable Tim Houston, Premier of Nova Scotia

The Honourable Kim Masland, Nova Scotia Minister of Public Works

Kody Blois, M.P. Kings-Hants

MLA, Melissa Sheehy-Richard

WHRM Council

NSFM



WEST HANTS
NOVA SCOTIA

October 21, 2019

Canadian Radio-television and Telecommunications Commission (CRTC)
Ottawa, Ontario
K1A 0N2

Re: Reliable Telecommunication Service

Members of the CRTC,

The Municipality of the District of West Hants, a largely rural municipality, has many areas that lack in the infrastructure required for reliable cell phone coverage therefore have many of our residents reliant on landlines.

During the recent storm, Hurricane Dorian, most of our residents lost power and had to rely on their cellular and home phones to receive safety and power updates and to be able to check on the welfare of friends and family. Unfortunately, due to the lack of infrastructure and power back up provisions in place by telecommunication providers, the cell phone service was spotty, and many home phone services were completely unusable.

The Council of West Hants requests that the CRTC stress to telecommunication providers the importance of having reliable phone service during weather related events for the safety of all residents in Canada. We also ask that you encourage telecommunication providers to strengthen their infrastructure to withstand similar weather events.

Sincerely,

Abraham Zebian
Warden

Appendix 11 Events related to Telecom and Broadcasting Notice of Consultation 2025-180

Year	Event
1959	North American Air Defence (NORAD) establishes a detection and telecommunication (teletype, voice messages) system – Attack Warning Siren System – to transmit warnings of nuclear, chemical or biological events via National Defence Headquarters to the Canadian Federal Warning Centre at Canadian Forces Station Carp, which would then sound an Attack Warning Siren System and also alert Provincial Warning Centres ¹
1986	Emergency Preparedness Canada established ²
1988	<i>Emergency Preparedness Act</i>
1987	Decision CRTC 87-899 licenses MeteoMedia's Weather Now specialty programming service with a wholesale monthly subscriber rate of \$0.20; it began operations in September 1988s ³
1992	Attack Warning Siren System decommissioned (see footnote 1) Alberta launches Alberta Emergency Alert (AEA) system ⁴ Decision CRTC 92-453 denies Pelmorex' application to acquire Weather Now => see 1993
1993	Decision CRTC 93-200 approves Pelmorex' application to acquire MétéoMédia/ Weather Now (reduced its monthly subscriber rate to \$0.23 in September 1993 ⁵) Public Notice CRTC 1993-48 exempts networks that supply radio and/or television stations "with coverage of unexpected, non-recurring events, such as special concerts and commemorative programs, or of public emergencies such as natural disasters and major accidents"
1994	Decision CRTC 94-664 renews MétéoMédia/The Weather Network licence to August 2001; CRTC does not uphold concerns from The Canadian Association of the Deaf and le Regroupement Québécois pour le Sous-Titrage Inc
1995	<i>Federal Policy for Emergencies</i>
1997	Public Notice CRTC 1997-150 amends BDU regulations to permit BDUs to alter programming services "to insert an emergency alert message warning the public of imminent danger to life or property, in accordance with an agreement entered into with the programming undertaking or ... the network responsible for programming service" (paragraph 101)
1999	Federal/Provincial Strategy for Training and Education in Emergency Preparedness and Response (Training Strategy) ends in March 1999 ⁶ Public Notice CRTC 1999-197 exempts new media broadcasting undertakings from regulation and licensing
2000	Canadian Emergency Management College and its provincial/territorial partners begin developing National Training Strategy ⁷
2001	Emergency Preparedness Canada, formed in 1986, becomes Office of Critical Infrastructure protection and Emergency Preparedness (OCIPEP) under Department of National Defence ⁸ Decision CRTC 2001-123 denies Pelmorex' 1999 application for "All Channel Alert" system; says distribution industry's concerns should be addressed by, among other things, "developing a methodology to ensure that messages inserted on interconnected systems reach only the intended audience" and "investigating issues and problems associated with implementing ACA on systems employing digital distribution" => see 2004 Decision CRTC 2001-668 renews The Weather Network/MétéoMédia to August 2008, denies 2¢ increase in wholesale monthly subscriber rate, "expects" Pelmorex to improve accessibility of its main service, requires it to report improvements by November 2003 and to be 90% captioned by September 2006 Public Notice CRTC 2001-121 exempts cable systems with fewer than 2,000 subscribers while permitting them to alter programming services to insert emergency alert messages (as in 1997-150)
2002	Industry Canada launches a public alerting initiative to study gaps and investigate new technologies for public alerting in Canada ⁹

Year	Event
	Pelmorex Corp. announces launch of mobile.theweathernetwork.com and mobile.meteomedia.com are launched for mobile devices ¹⁰
2003	First Canadian Public Alerting Workshop & Forum takes place in Ottawa to discuss Industry Canada concept of “a Canada wide public alerting system” ¹¹ The Weather Network/MétéoMédia launch in-channel, satellite-based interactive service ¹²
2004	Pelmorex applies to CRTC for an all-channel alert programming service (Application 2004-1260-2) => see 2006 Broadcasting Public Notice CRTC 2004-82 sets out CRTC’s regulatory framework for interactive television services
2005	Department of Public Safety and Emergency Preparedness established ¹³ Industry Canada establishes a Broadcasters’ Public Alerting Working Group ¹⁴ Broadcasting Public Notice 2005-38 invites applications for an all-channel alert programming service
2006	Canadian Emergency Preparedness College renamed Canadian Emergency Management College ¹⁵ Industry Canada sponsors CANALERT, a partnership involving federal departments, provincial, territorial and municipal governments, and the broadcasting and telecommunications industries, and is responsible for the creation of standards and protocols for emergency alert messages (see Broadcasting Decision CRTC 2007-73, footnote 1) Broadcasting Notice of Public Hearing CRTC 2006-3 announces May 2006 public hearing to consider all-channel alert applications by Pelmorex, CBC and BCE => see 2007
2007	Federally funded Canadian Interoperability Technology Interest Group (CITIG) formed to improve Canadian public safety communications interoperability; consists of responders, academia, industry and government stakeholders ¹⁶ <i>An Emergency Management Framework for Canada</i> published (online version unavailable) Broadcasting Public Notice CRTC 2007-20 sets out CRTC’s approach to emergency alert services in Canada, based on BDUs’ voluntary carriage of emergency alert services Broadcasting Decision CRTC 2007-72 amends The Weather Network/MétéoMédia conditions of licence to enable it to provide emergency alert messages and permits it to charge BDUs that distribute the messages an additional negotiated rate above its \$0.23 monthly basic-service subscriber fee Broadcasting Decision CRTC 2007-73 encourages CBC to broadcast emergency alert messages Broadcasting Decision CRTC 2007-74 encourages Bell ExpressVu to implement an emergency alert service <i>Emergency Management Act, S.C. 2007, c. 15</i>
2009	Federal Emergency Response Plan (Ottawa, December 2009) Public Safety Canada, <i>Status Report to the CRTC on the Participation of the Broadcast Industry</i> (Ottawa, 16 January 2009) Public Safety Canada, National Strategy for Critical Infrastructure Broadcasting Decision CRTC 2009-145 renews The Weather Network/MétéoMédia administratively from August 2009 to August 2010 (note that Broadcasting Decision CRTC 2001-668, above, renewed the service to August 2008) Broadcasting Order CRTC 2009-340 requires direct-to-home (DTH) and Class 1 terrestrial BDUs to distribute The Weather Network/MétéoMédia on the digital basic service from September 2010 to August 2015, and approves Pelmorex’ proposal to “act as a national aggregator and distributor of emergency alert messages, which will be delivered using non-proprietary technology and available free-of-charge to BDUs on a voluntary basis” (paragraph 1), and requires Pelmorex to establish an operational governance structure (Governance Board, paragraph 25) Broadcasting Order 2009-660 amends 1999 new media exemption order
2010	NAAD system is operational ¹⁷ Blackberry launches WeatherEye mobile app Public Safety Canada releases Canadian Profile of the Common Alerting Protocol Event References , Beta 0.4 (24 October 2010) Canadian Security Telecommunications Advisory Committee established
2011	Federal Emergency Response Plan (January 2011) <i>An Emergency Management Framework for Canada</i> , Second Edition, is published Emergency Management Planning Guide 2010-2011

Year	Event
	Decision CRTC 2011-438 renews The Weather Network/MétéoMédia from September 2011 to August 2018, grants mandatory distribution for the service and requires “Pelmorex to ensure that emergency alert messages include audio information indicating the urgency and basic nature of the imminent threat, where such audio content was provided by the issuing authority” ¹⁸
2012	Federal Policy for Emergency Management (Ottawa, 2012)
2013	<p>National Public Alerting System common Look and Feel Guidance 1.0 (24 April 2013) published by Senior Officials Responsible for Emergency Management (SOREM) at the request of the “Federal/Provincial/Territorial Public Alerting Working Group of Senior Officials responsible for Emergency Management with the support of Defence Research and Development Canada - Centre for Security Science, Canadian Safety and Security Program, and in consultation with the public-private Common Look and Feel Working Group”¹⁹</p> <p>Broadcasting Decision CRTC 2013-263 renews CBC’s licences, says it “should only be required to distribute urgent and credible alerts to the public ... that are disseminated by the [National Alert Aggregation and Dissemination] NAAD system for immediate broadcast” (paragraph 294), by condition of licence requires CBC to implement a public alerting system on all of its radio stations (paragraph 296) and encourages it “to implement an alerting solution for its 27 over-the-air television transmitters to ensure that all Canadians receive timely warnings of immediate perils during the new licence term” (paragraph 297)</p>
2014	<p>Broadcasting Regulatory Policy CRTC 2014-444 updates CRTC’s approach to emergency alert services in Canada</p> <p>Alert Ready launches through a partnership of “federal, provincial and territorial emergency management officials, Environment and Climate Change Canada, Pelmorex, the broadcasting industry and wireless service providers”</p>
2016	National Public Alerting System: Common Look and Feel Guidance , Version 1.2 (14 September 2016)
2017	An Emergency Management Framework for Canada , Third Edition, published (May 2017)
2018	<p>CRTC staff, <i>Subject: Compliance with Wireless Public Alerting Requirements – Iris Technologies Inc.</i> (Gatineau, 20 June 2025)</p> <p>...</p> <p>Commission staff is aware that on 15 March 2018, Iristel (through its affiliate Ice Wireless) filed a joint part 1 application with the Commission seeking a suspension or variance of Telecom Regulation Policy 2017-91, arguing that the Commission erred in its determination “that WPA implementation...would result in nominal costs on a per-customer basis”. By staff letter, this application was returned on 29 March 2018, and an expectation was given that the Commission would “...take a holistic view of wireless public alerting implementation and identify potential obstacles to full participation” by all wireless service providers (WSPs). However, since that date, no follow-up action has been taken by the Commission.</p> <p>...</p> <p>Broadcasting Decision CRTC 2018-342 renews The Weather Network/MétéoMédia from September 2018 to August 2023</p> <p>Secretary General, <i>RE: Requirement that Wireless Service Providers distribute additional visible wireless test alerts</i>, Telecom Commission Letter Addressed to Distribution List (Ottawa, 3 October 2018)</p> <p>...</p> <p>The dissemination and distribution of province-wide visible wireless test alerts issued during the 2018 EPW did not achieve full success, in light of reported issues in the consistency of tests. Accordingly, Pelmorex, the current operator of the National Alert Aggregation and Dissemination (NAAD) System, and WSPs were requested to provide information with respect to the issues encountered during EPW 2018. These responses can be found on the Commission’s website.</p> <p>Chief Consumer Officer and Executive Director, Consumer Affairs and Strategic Policy, CRTC, <i>Subject: Wireless Public Alerting (WPA) – 28 November 2018 visible test alerts</i>, Telecom Commission Letter Addressed to Distribution List (Ottawa, 29 November 2018) => unavailable from CRTC’s 2018 Telecommunications Letters page:</p> <p>...</p> <p>In light of the importance of ensuring that Canadians can access emergency alerts on their compatible LTE wireless mobile devices, we request that you provide the following information so that the Commission is able to assess whether the distribution of the 28 November tests achieved the objectives of WPA testing: What actions did you take (such as software updates, text messages, etc.) prior to the dissemination of the visible wireless public test alerts on 28 November 2018?</p>

Year	Event
	<p>Did you encounter any issues during the 28 November 2018 visible test alerts? If so, what were they? Did any of these issues impede your ability or role in ensuring that the tests achieved full success?</p> <p>What issues are in your ability or power to address? What actions will you/did you take to resolve these issues and in what timeframes?</p> <p>Are there any outstanding issues which are in your ability or power to address that remain unresolved? If so, what are they, and what actions are you taking to resolve them, and in what timeframes?</p> <p>The information provided as part of the responses to the questions above should provide detailed breakdowns, by province, from your perspective as a WSP. Please be advised that the information you provide may be added to the record of a future public proceeding inquiring into the matter. Depending on the nature of the responses received, the Commission may examine, as part of this process, whether any additional measures are necessary. ... In light of the significant importance of this issue, responses are to be filed with the Commission no later than 7 December, 2018.</p> <p>...</p>
2019	<p><u>Emergency Management Strategy for Canada: Toward a Resilient 2030</u></p> <p>SOREM reconstitutes the Emergency Management Strategy Working Group and adopts its plan in June 2019²⁰</p> <p>CRTC approves federal-provincial governments' application to conduct provincial and territorial public awareness tests twice a year</p>
2021	<p>CRTC, <u>Exploring attitudes towards Wireless Public Alerting System in Canada: Executive Summary</u>, Prepared for the CRTC by Kantar – commissioned 7 February 2020 and delivered 15 January 2021</p>
2022	<p>Federal, Provincial, and Territorial <u>Emergency Management Strategy Interim Action Plan 2021-2022</u></p> <p><i>Distribution of emergency alert messages – Decommissioning of the Alberta Emergency Alerting System and transition to the National Alert Aggregation Dissemination System</i>, <u>Broadcasting Information Bulletin CRTC 2022-232</u> (Ottawa, 29 August 2022):</p> <p>...</p> <p>3. Since 1992, the Province of Alberta, through the Alberta Emergency Management Agency (AEMA), has operated its Alberta Emergency Alert (AEA) System, a system with similar functionality to the NPAS. As part of the AEA System, the AEMA installed equipment in several Albertan broadcasting facilities to enable the distribution of emergency alert messages to Albertans. The AEA System incorporates the messages from the NAAD System.</p> <p>...</p> <p>5. In a letter to Alberta-based broadcasters dated 30 April 2022, the AEMA stated its intent to decommission the AEA System and for affected broadcasters to transition to the NAAD System, effective March 2023. It stated that it has transferred all responsibility in regard to emergency alert messages to broadcasters. ...</p> <p>6. The AEMA indicated that it would be providing some financial support to assist with the transition in the form of an agreement with Trispec to have ENDEC alert broadcast decoder equipment transitioned from the AEA System to the NAAD System. In this regard, the AEMA will provide broadcasters with technical and financial assistance in the form of reprogramming services during the transition from the AEA System to the NAAD System.</p> <p>...</p> <p>8. As the AEMA has made available some time-limited financial resources to assist with the transition, the Commission considers that it is important to ensure that all affected broadcasting undertakings are aware of the finite timeline for leveraging this assistance, which ends on 31 January 2023. The Commission therefore encourages affected broadcasting undertakings to contact officials at the AEMA and take the necessary steps to connect all public alerting equipment to the NAAD System, thereby ensuring the continued receipt and distribution of emergency alert messages from the NPAS in fulfillment of their regulatory obligations.</p>
2023	<p>The <i>Online Streaming Act</i>, Bill C-11, receives Royal Assent on 27 April 2023</p> <p><i>Various television programming services and networks, and broadcasting distribution undertakings – Administrative renewals</i>, <u>Broadcasting Decision CRTC 2023-245</u>, (Ottawa, 8 August 2023) Appendix 4, administratively renews Pelmorex' The Weather Network/MétéoMédia licence from August 2023 to August 2026</p> <p>Mark Phillips, Chief Administrative Officer, West Hants Regional Municipality, Nova Scotia, <u>Subject: Improved Cell (Mobility) Service and Coverage</u>, (Windsor [NS], 9 August 2023):</p>

Year	Event
	<p>p.1</p> <p>...</p> <p>...there are many areas within the municipality such as Brooklyn, Ellershouse, and Vaughan where calls are frequently dropped or cannot be made resulting in concern over public safety should an emergency arise.</p> <p>p. 2:</p> <p>Since the release of Canada’s connectivity strategy by the Office of the Auditor General of Canada in 2019, we were told that “mobile cellular coverage has improved”. However, a 2023 report (1 of 4) done by the Auditor General of Canada to the Parliament of Canada tells a different tale. Take a one-hour drive northwest of Halifax, you will experience the “digital divide”, that still exists between urban Nova Scotia and the rural areas of West Hants, and our neighbouring Glosscap First Nation reserve. In 2019, correspondence was sent regarding the unreliability of cellular service in the West Hants area, particularly the unavailability of the 911 system. With little response received, the West Hants Regional Municipality is once again calling for action to address this safety concern. Residents and Emergency services rely on cellphones to alert people of dangers. We need Governments and regulators to address connectivity dead zones across our region. Given the tragic events experienced in Nova Scotia the last few years; Portapique tragedy, Nova Scotia Wildfires and specifically, the massive flooding triggered by widespread rainstorms in West Hants, the urgency to have communications available to all of our residents is CRITICAL.”</p> <p>During the July 21, 2023 torrential downpour and persistent thunder and lightning event, many were left with no access to telecommunications. Residents and emergency crews within West Hants were unable to have access to acceptable cellular service without calls being completed or dropped due to poor service levels. There is no question telecommunications need to improve. Canada’s connectivity strategy stated, “being connected is no longer a luxury but a basic essential service. Can you imagine being stranded in a flash flood and not being able to call for help? Can you imagine trying to coordinate a search for missing persons and having little to no cell coverage. West Hants Regional Municipality is requesting the Canadian Radio-television and Telecommunications Commission (CRTC) step in to address greater regulations within the industry for performance standards.</p> <p>The Municipality would like to assist in any way it can with improving mobility services. We will start by inviting you to participate in an information exchange regarding the current service coverage you offer, what challenges you are facing, and how improvements can be made to the overall service. For example, we have had past engagements with specific carriers to assist with site locations for cell tower installations. We would be open to discussing such matters and others. I thank you for your time in reviewing this letter and assume you have mutual interest in improving services. At your convenience, please reach out to me so that we might establish a dialogue.</p> <p>....</p>
	<p>Alberta Emergency Management Agency (AEMA)“transitioned to the NAAD System platform”²¹</p>
2024	<p>On 28 March 2024 FRPC files <i>Changing times, changing needs</i>, a Part 1 application, with the CRTC asking it to review and update its 2014 policy regarding broadcast emergency alerts</p> <p><i>Consumer Protections Action Plan</i> [Date modified: 2 April 2024]:</p> <p>...</p> <p>Key themes</p> <ul style="list-style-type: none"> • Preventing bill shock • Improving consumer codes • Helping ensure reliable networks • Supporting public participation <p>....</p> <p>Consultation on improving the National Public Alerting System</p> <p>This consultation will consider improving the accessibility of alerts for all Canadians, and helping ensure they are available across the country and in language that reflect local communities.</p> <p>Status: Planned for spring 2025</p> <p>...</p>

Year	Event						
	<p>CRTC staffperson, Telecommunications, <i>MEMORANDUM TO THE CHAIRPERSON AND CEO</i> , Protected B (Ottawa, 27 May 2024)</p> <p>BACKGROUND:</p> <ul style="list-style-type: none">• In July 2023, the West Hants Regional Municipality in Nova Scotia experienced severe rain and flash flooding causing extensive infrastructure damage.• During this event, there were five Wireless Public Alerts, authorized and issued; however, not all cell phones/people received them.• Additionally, some alerts were received by people out of sequence leading to confusion. <p>CONSIDERATIONS:</p> <ul style="list-style-type: none">• Cellular and internet were extremely poor in most impacted areas.• Additionally, networks were loaded, given the magnitude of the event with many responding agencies.• [REDACTED]• To improve cell phone coverage, municipal elected officials have made a motion to send a letter to cell phone carriers and other elected officials (provincially and federally) on the need for significant improvement; the letter was sent 9 August 2023.• On 26 October 2023, Nova Scotia announced investing \$47.3 million to start the new Cellular Program which will expand telecommunications infrastructure and communications networks in the province: More info at https://news.novascotia.ca/en/2023/10/26/province-taking-action-bring-cell-service-all-nova-scotians.• To ensure Wireless Public Alerts are sent out quicker, West Hants Regional Municipality has:<ul style="list-style-type: none">◦ Established an emergency dispatch process and procedure with one of Nova Scotia's 911 Public Safety Answering Points. This new procedure will expedite alert requests.◦ Expanded who can request & authorize WPA in-conjunction with the NS EMO.						
	<p>A/Director, Financial and Multiplatform Technology Analysis, CRTC, <i>Subject: Application submitted by FRPC regarding emergency alerts and the National Public Alerting System</i>, (Ottawa, 13 June 2024)</p> <p>...</p> <p>Given that your letter is requesting that we hold a proceeding and does not request any other specific regulatory measures, we will not treat your letter pursuant to Part 1 of the CRTC Rules.</p> <p>....</p> <p>On 29 July 2024 FRPC asks CRTC for its reasons for denying process to FRPC's Part 1 application</p>						
	<p><i>Consumer Protections Action Plan</i> [Date modified: 20 December 2024]:</p> <p>...</p> <p>Key themes</p> <ul style="list-style-type: none">• Preventing bill shock• Improving consumer codes• Helping ensure reliable networks• Supporting public participation <p>....</p> <p>Consultation on improving the National Public Alerting System</p> <p>This consultation will consider improving the accessibility of alerts for all Canadians, and helping ensure they are available across the country and in language that reflect local communities.</p> <p>Status: Planned for winter 2025</p>						
2025	<p>National Public Alerting System – Implementation Summary - NPAS Implementation Summary -Data – English</p> <table><tr><th>Version</th><th>Published date</th><th>Description of the change</th></tr><tr><td>1.0</td><td>March 2025</td><td>First release of NPAS implementation summary data for broadcasting period from 2021 to 2023</td></tr></table> <p><i>Consumer Protections Action Plan</i> [Date modified: 2 April 2025]</p>	Version	Published date	Description of the change	1.0	March 2025	First release of NPAS implementation summary data for broadcasting period from 2021 to 2023
Version	Published date	Description of the change					
1.0	March 2025	First release of NPAS implementation summary data for broadcasting period from 2021 to 2023					

Year	Event
	<p>...</p> <p>Key themes</p> <ul style="list-style-type: none"> • Preventing bill shock • Improving consumer codes • Helping ensure reliable networks • Supporting public participation <p>....</p> <p>Consultation on improving the National Public Alerting System</p> <p>This consultation is reviewing how public alerts are distributed in Canada. The goal is to help improve the NPAS, including by improving the accessibility of alerts, considering whether alerts should be distributed in languages that reflect local communities, and ensuring that they are available across the country.</p> <p>....</p>
	<p><i>Call for comments – Improving the public alerting system, Telecom and Broadcasting Notice of Consultation CRTC 2025-180 (Gatineau, 15 July 2025)</i></p>
	<p><i>Consumer Protections Action Plan [Date modified: 15 July 2025]</i></p>
	<p>National Public Alerting System – Implementation Summary - NPAS Implementation Summary -Data – English</p> <p><i>Version Published date Description of the change</i></p> <p>2.0 September 2025 Added NPAS implementation summary data for the broadcasting year of 2024</p> <p>47</p>
	<p><i>Call for comments – Improving the public alerting system – Changes to procedure, TBNOC 2025-180-1 (Gatineau, 10 October 2025)</i></p> <p>Revised deadline for submission of interventions: 21 November 2025</p> <p>Revised deadline for submission of replies: 19 December 2025</p> <p>Revised deadline for submission of final written submissions: 28 January 2026</p>
	<p><i>Mandatory notification and reporting of major telecommunications service outages, Telecom Decision CRTC 2025-225 (Gatineau, 4 September 2025)</i></p>
	<p><i>Consumer Protections Action Plan [Date modified: 4 September 2025]</i></p>
	<p><i>Budget 2025 (Ottawa, 4 November 2025)</i></p>
	<p><i>Consumer Protections Action Plan [Date modified: 13 November 2025]</i></p>



End Notes

- ¹ Civil Defence Museum, *Canadian National Attack Warning Siren System*, <https://civildefencemuseum.ca/canadian-national-attack-warning-siren-system> (accessed 4 February 2024); s.a. "The Canadian Federal Warning and Reporting (CFWRS) System", <https://davescoldwarcanada.com/home/civil-defence/the-canadian-federal-warning-and-reporting-cfwrs-system/> (accessed 4 February 2024).
- ² Stephen Harris, "Civil Defence" <https://www.thecanadianencyclopedia.ca/en/article/civil-defence> (6 February 2006, last edited 4 March 2015).
- ³ *Licence renewal for MétéoMédia/The Weather Network*, [Decision CRTC 94-664](#) (Ottawa, 18 August 1994).
- ⁴ BRP 2014-444, paragraph 66.
- ⁵ *Licence renewal for MétéoMédia/The Weather Network*, [Decision CRTC 94-664](#) (Ottawa, 18 August 1994).
- ⁶ Public Safety Canada, "[Canadian Emergency Management College History](#)", (15 December 2015) [accessed 15 November 2023].
- ⁷ Public Safety Canada, "[Canadian Emergency Management College History](#)", (15 December 2015) [accessed 15 November 2023].
- ⁸ Stephen Harris, "Civil Defence" <https://www.thecanadianencyclopedia.ca/en/article/civil-defence> (6 February 2006, last edited 4 March 2015).
- ⁹ Industry Canada, *Canadian Profile of the Common Alerting Protocol (CAP-CP) Introduction and Rule Set Beta 0.3*, "Canada's needs" (Ottawa, 2009).
- ¹⁰ Pelmorex Corp., "Our story: Timeline" <https://www.pelmorex.com/en/our-story/> [date accessed: 10 November 2023].
- ¹¹ Lionel Eshlemann (TELUS Geomatics), Ron Martin (City of Vancouver) and Dorit Mason (City of Coquitlam), *Public Alerting In Canada: A British Columbia Perspective on Emergency Notification*, PowerPoint presentation, Slide 6.
- ¹² Pelmorex Corp., "Our story: Timeline" <https://www.pelmorex.com/en/our-story/> [date accessed: 10 November 2023].
- ¹³ Parliament of Canada, "Public Safety and Emergency Preparedness (2005-04-04 -)", Parlinfo [accessed 15 November 2023].
- ¹⁴ See *Call for applications to provide an all channel alert (ACA) service*, Broadcasting Public Notice CRTC [2005-38](#), (Ottawa, 22 April 2005).
- ¹⁵ Public Safety Canada, "[Canadian Emergency Management College History](#)", (15 December 2015) [accessed 15 November 2023].
- ¹⁶ Canadian Interoperability Technology Interest Group (CITIG), *CITIG: A Partnership that Works, About CITIG* (accessed 24 January 2024):

Background

When first responders can't communicate during an emergency or major event, lives can be in jeopardy. In 2007, the Canadian Interoperability Technology Interest Group (CITIG) was created to improve Canadian public safety communications interoperability. At the time, CITIG was a responder-driven, federally-funded activity, led by Canadian Police Research Centre (CPRC) that brought together responders, academia, industry and government stakeholders who shared a common interest in enhancing Canada's communications interoperability and are dedicated to improving the safety and security of first responders, and the people and critical infrastructure of Canada.



That tradition continues, and as of 2012, CITIG is now managed in partnership by the Canadian Association of Chiefs of Police (CACP), the Canadian Association of Fire Chiefs (CAFC) and Paramedic Chiefs of Canada (PCC).

Today, CITIG is made up of more than 1,900 volunteers from the responder community, all orders of government, non-governmental organizations, associations, academia and industry.

¹⁷ Broadcasting Regulatory Policy CRTC 2014-444, paragraph 5; National direct-to-home broadcasting distribution undertaking - Extension of deadline for the distribution of emergency alert messages, [Broadcasting Decision CRTC 2015-120](#) (Ottawa, 31 March 2015)

¹⁸ BRP 2014-444, paragraph 34, citing Broadcasting Decision CRTC 2011-438.

¹⁹ BRP 2014-444, paragraph 25.

²⁰ Public Safety Canada, [Emergency Management Strategy \(EMS\) for Canada, Ministerial briefing materials](#) (Date modified: 2020-03-18).

²¹ Pelmorex, "NAAD System Governance Council Update: Public Summary of the April 25, 2023 Meeting", alerts.pelmorex.com, <https://alerts.pelmorex.com/>, at 3.

End Notes

¹ "Office of the Provincial Security Advisor, Ministry of the Solicitor General, Ontario, *Investigation into the emergency alerts sent on January 12, 2020: Report*, (Toronto, 20 October 2021; Updated: 19 January 2024 => note, however, that online news articles dated 27 February 2020 referred to the Report's findings), "Creating an alert".

² Alerts.pelmorex.com, "CAP Rules", (accessed 7 March 2024).

³ Public Safety Canada, [Canadian Profile of the Common Alerting Protocol \(CAP-CP\) Introduction and Rule Set Beta 0.3](#), (6 May 2009) at 1, "Purpose of this Document".

⁴ National Public Alerting System, "CAPAN CAP Event Location Layer", <https://npas.ca/clf/capan-event-location-layer/> (accessed 12 March 2024):

The Canadian Association for Public Alerting and Notification (CAPAN) became the Canadian Public Safety Operations Organization (CanOps) on September 30 2014. CAPAN had voluntarily served the public safety community since July 2008, by developing, incubating, studying and supporting numerous specifications, products and services; including the Canadian Profile of the Common Alerting Protocol (CAP-CP) and the international Common Alerting Protocol (CAP), Emergency Management Symbolology (and taxonomy), the Canadian Emergency Management Communications Specification – Change Management Process (CMP), the national and New Brunswick Multi-Agency Situational Awareness Systems (MASAS), the National Public Alerting System (NPAS), and the National Alert Aggregation Dissemination (NAAD) System. CanOps continues to do so.

....

⁵ Federal / Provincial / Territorial Public Alerting Working Group of Senior Officials Responsible for Emergency Management, *National Public Alerting System: Common Look and Feel Guidance*, Version 2.0 (29 March 2018), at 3.

⁶ Public Safety Canada, *Emergency Management Strategy for Canada: Toward a Resilient 2030*, [Cat. No. PS9-11/2019E](#) (Ottawa, 2019).

⁷ Government of Canada, *Get Prepared, Emergency management organizations*, <https://www.getprepared.gc.ca/cnt/rsrscs/mrgnc-mgmt-rgnztns-en.aspx>.

⁸⁸⁸ Federal / Provincial / Territorial Public Alerting Working Group of Senior Officials Responsible for Emergency Management, *National Public Alerting System: Common Look and Feel Guidance*, Version 2.0 (29 March 2018), at 6.

⁹ Pelmorex Response to the Commission's Request for additional information in regard to the application filed by Pelmorex to renew the licence of The Weather Network/MétéoMédia – Application # 2017-0586-5, page 8, Answer to CRTC question 8.

¹⁰ Public Safety Canada, [National Public Alerting System](#) [accessed 3 March 2024].

¹¹ FRPC, *Changing times, changing needs: Proposal for CRTC to gather information in 2024 so that it can hold a public consultation in 2025 on Canada's approach to the broadcast of emergency alerts and information*, ([Ottawa, 28 March 2024](#)).

¹² [Environment Canada](#) defines the summer as consisting of June, July and August.

¹³ Telecom and Broadcasting Notice of Consultation CRTC 2025-180, marginal note preceding paragraph8.

¹⁴ Director, Financial and Multiplatform Technology Analysis, CRTC, *Subject: Telecom and Broadcasting Notice of Consultation CRTC 2025-180, Call for comments - Improving the public alerting system — Procedural Request Submitted by FRPC* [on 5 November 2025], (Ottawa, 21 November 2025), at page 2.

¹⁵ 2025-180, ¶19.

¹⁶ 2025-227, ¶18.



¹⁷ *Broadcasting Act*, s. 3(2); *Canadian Radio-television and Telecommunications Commission Act*, s. 12(2).

¹⁸ The *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* define a party as “an applicant, respondent or intervener”.

¹⁹ The 3 February 2023 letter was published by Canadian Heritage on 6 February 2023 in a News release.

²⁰ FRPC estimates that the CRTC has issued 35 amendments of the *Plan* it issued on 8 May 2023.

²¹ CRTC, *Exploring attitudes towards Wireless Public Alerting System in Canada: Final Report*, [Public Opinion Research on Wireless Public Alerting supplied by Kantar](#) (Ottawa, January 2021), page 1 of 70 (title page).

²² It can be obtained from the Government of Canada’s ‘Collections’ site:

https://publications.gc.ca/collections/collection_2021/crtc/BC92-113-2021-eng.pdf.

²³ *Call for comments – Telecommunications in the Far North, Phase II*, [Telecom Notice of Consultation CRTC 2022-147](#) (Ottawa, 8 June 2022), “Summary” and at ¶¶100-101.

How to Participate in Phase II

To make it easier to share your views, the CRTC is also using a new online engagement platform. You have until **6 October 2022** to share your views through the [engagement platform](#).

...

99. The CRTC will hold an open information session on 22 June 2022. This information session is for anyone who is interested in learning more about how to participate in this proceeding. The information session will be followed by a question and answer period. If you wish to participate, you can register on the engagement platform.

...

You have until **6 October 2022** to share your views through the [engagement platform](#).

101. The engagement platform has been adapted such that only select questions have been made available on the platform. For the full list of consultation questions, please refer to Appendix 1.

102. A report of all submissions received via the online engagement platform will be placed on the public record of this proceeding for parties to consider in their further comments. The report will consist of an exact copy of views shared through the online engagement platform. The report will consist of an exact copy of views shared through the online engagement platform.

103. With respect to information provided through the online engagement platform, please note that:

- The information provided to the CRTC as part of the online engagement platform is entered into a searchable database on the engagement platform.
- Submissions will be attributed to the username given during the registration process on the platform.
- These comments and usernames are also searchable with the help of third-party search engines.
- If you provide any personal information through the platform, it will also be searchable; any such information will be used and may be disclosed for the purpose for which the information was obtained or compiled by the CRTC, or for a use consistent with that purpose.

104. Those who only provide their views via the online engagement platform are not considered parties to the proceeding. In general, a party to the proceeding has their comments attributed to them, can participate in the oral hearing, can provide final submissions at the end of the proceeding and may be named (but are not required to participate) in any appeal of the CRTC’s decision.

105. If you wish to become a party, you must submit a formal intervention via the online form, fax or traditional mail. Details on how to submit a formal intervention are provided below.

²⁴ Call for comments – *Telecommunications in the Far North, Phase II*, [Telecom Notice of Consultation 2022-147](#), (Ottawa, 8 June 2022) at ¶102; Director, Telecommunications Networks Policy, Telecommunications Sector, CRTC, *RE: Telecommunications in the Far North, Phase II, Telecom Notice of Consultation 2022-147, Publication of report of comments received through the engagement platform* (CRTC Conversations) ([Ottawa, 10 January 2023](#)).

²⁵ The CRTC posted comments by official language, as follows:

	English Facebook page	French Facebook page
General comments	38 comments	13 comments
Reflection	4 comments	1 comment
Production	2 comments	2 comments
Accessibility and discoverability	5 comments	
Democratic life	7 comments	

²⁶ Canadian Broadcasting Corporation – *Various audio and audiovisual services – Licence renewals*, [Broadcasting Decision CRTC 2022-165](#) and Broadcasting Orders CRTC 2022-166 and 2022-167 (Ottawa, 22 Juen 2022) at paragraph 6.

²⁷ Rogers, *Re: Broadcasting and Telecom Notice of Consultation CRTC 2025-94-1: Call for comments – A new approach to funding public interest participation in Commission proceedings*, at paragraph 11.

²⁸ See e.g. *Joint investigation into a data breach at 23andMe by the Privacy Commissioner of Canada and the UK Information Commissioner*, [2025 CanLII 74841](#) (PCC).

²⁹ Canada’s first telegraph company incorporated in 1846 (the Toronto, Hamilton & Niagara ElectroMagnetic Telegraph Company). Robert E. Babe, *Telecommunications in Canada: Technology, Industry and Government* (University of Toronto Press: Toronto, 1990) at 37.

³⁰ *An Act to provide by one General Law for the Incorporation of Electric Telegraph Companies*, S.C. 1852, c. 10, 16 Vict., section X: it became mandatory for telegraph operators to give precedence to the transmission of telegrams related to “the Administration of Justice, arrest of criminals, the discovery or prevention of crime, and Government Messages ... if required by persons connected with the Administration of Justice, or by any person thereunto authorized by the Provincial Secretary.”

³¹ Deputy Minister of Marien and Fisheries, “Marconi wireless telegraph system”, Report, appendix 1, *Sessional Papers* No. 21 (1st Sess. 10th Parl.), 12 December 1904, 114-115, reproduced in Roger Bird, *Documents of Canadian Broadcasting*, (Ottawa, Carleton University Press, 1988), at 15 (Document 4).

³² Department of Marine and Fisheries, *License to use Radio*, (18 April 1923: Public Archives of Canada, RG 97, Vo. 149, 6206-72-1 – reproduced in Roger Bird, *Documents of Canadian Broadcasting*, (Ottawa, Carleton University Press, 1988), Document 7, 31-36 at 32, s. 10:

(I) If and whenever any department of the Government shall require the licensee, his servants or agents to transmit by means of the licensed apparatus, any message on His Majesty’s Service, such messages shall have priority over all other transmissions and the licensee, his servants and agents, shall, as soon as reasonably may be, transmit the same, and shall, until transmission thereof suspend all other transmission.

³³ CRBC, *Rules and Regulations*, PC 535 (15 April 1933), Part V (Programs), section 96: “The licensee shall, upon request of the Commission give right-of-way to such programs in in the judgment of the Commission are of national interests. In such event neither the licensee nor the Commission shall incur any liability for compensation or damages.” Reproduced in Roger Bird, *Documents of Canadian Broadcasting*, (Ottawa, Carleton University Press, 1988), 158-166 at 165, Document 21.

Canadian Broadcasting Corporation, *Regulations for broadcasting stations made under the Canadian Broadcasting Act, 1936*, Chapter 24, S. 22, CBC Pamphlet (Ottawa, 1937);

³⁴ 1936 *Canadian Broadcasting Act*, as am in 1951, s. 17: “Stations shall upon request of the Corporation give right of way to such Corporation or other programs as the Corporation shall designate. In such event neither the station nor the Corporation shall incur any liability for compensation or damages.”

- 35 David McConnell, *The Story of Emergency Preparedness Canada 1948-1998*,
<https://davescoldwarcanada.com/home/documents-references/history-of-civil-defence-emergency-preparedness-in-canada/>, 1998.
- 36 In 1941 “air raid sirens were positioned throughout” Rossland, British Columbia, to be “activated during a blackout”. Rossland Museum, *Air Raid Precautions (ARP): Rossland Civilian Defence During the Second World War*, “In Rossland” (accessed 5 February 2024).
- 37 Dominion Bureau of Statistics, *Canada Yearbook 1940* at 721.
- 38 Statistics Canada – historical household equipment statistics.
- 39 Civil Defence Museum, *Canadian National Attack Warning Siren System*,
<https://civildefencemuseum.ca/canadian-national-attack-warning-siren-system>.
- 40 Public Safety Canada, “[Canadian Emergency Management College History](#)”, (15 December 2015) [accessed 15 November 2023].
- 41 Civil Defence Museum, Canadian National Attack Warning Siren System
<https://civildefencemuseum.ca/canadian-national-attack-warning-siren-system>.
- 42 Public Safety Canada, “[Canadian Emergency Management College History](#)”, (15 December 2015) [accessed 15 November 2023].
- 43 *Broadcasting Act*, 7 Eliz. 2, c. 22 (6 September 1958), s. 11(f).
- 44 Previously the responsible federal department had licensed broadcasters, sometimes on the recommendation of the regulators.
- 45 1968 *Broadcasting Act*, s. 17(1)(a).
- 46 Subsection 2(d):
It is hereby declared that
...
the programming provided by the Canadian broadcasting system should be varied and comprehensive and should provide reasonable, balanced opportunity for the expression of differing view son matters of public concern, and the programming provided by each broadcaster should be of high standard, using predominantly Canadian creative and other resources;
....
- 47 Section 21: “The Commission may make rules respecting the procedure for making ... complaints [wording in the original] he Commission”
- 48 1973 *Radio (A.M.) Regulations and Radio (F.M.) Regulations*, s. 15(11).
- 49 *Amendments to the Radio Regulations, 1986*, [Public Notice CRTC 1991-89](#) (Ottawa, 30 August 1991)
...
The Commission has decided to retain in the regulations the clause permitting simultaneous broadcasts that are necessitated by public emergency.
...
[underlining and italics added]
- 50 For example, the CRTC’s 1975 *Cable Television Regulations*, SOR/75-664 (17 November 1975), effective 1 April 1976 (published by the CRTC on 14 November 1975), s. 18 explicitly prevented cable licensees from “altering” any signals they distributed unless required or authorized by the CRTC (through its licence or the regulations).
- 51 Environment and Climate Change Canada, [Timeline: Major milestones of Environment and Climate Change Canada](#), 50th Anniversary (accessed 29 January 2024).
- 52 In 1984 and 1985 *Louis-Georges Paradis*, [Decision CRTC 84-1061](#) (Ottawa, 27 December 1984).
- 53 *Avalon Cablevision Limited*, Broadcasting [Decision CRTC 85-175](#) (Ottawa, 12 April 1985): “The licensee is authorized to continue to distribute the CBC Parliamentary Television Network (English-language), Broadcast News, an automated weather and time service, Weather Radio Canada and educational programming. ...”

- 54 *Amendment to the Television Broadcasting Regulations, 1987; Amendment to the Cable*
Television Regulations, 1986, [Public Notice CRTC 1990-66](#) (Ottawa, 5 July 1990).
- 55 *MeteoMedia Inc.*, [Decision CRTC 87-899](#) (Ottawa, 1 December 1987)
- 56 “Optional-to-basic” – see *INTRODUCTORY STATEMENT TO DECISIONS CRTC 87-895 TO 87-906:*
CANADIAN SPECIALTY AND PAY TELEVISION SERVICES, [Public Notice CRTC 1987-260](#) (Ottawa, 30
November 1987), (II (ii) “Optional-to-basic”).
- 57 *MeteoMedia Inc.*, [Decision CRTC 87-899](#) (Ottawa, 1 December 1987).
- 58 1991 *Broadcasting Act*, subsections 9(1)(b), 3(1)(p), 3(1)(t) and 9(4), respectively.
- 59 *Ibid.*, subsection 18(3).
- 60 *PROPOSED EXEMPTIONS FROM LICENSING REQUIREMENTS*, [Public Notice CRTC 1992-5](#) (Ottawa,
17 January 1992).
- 61 *Ibid.*
- 62 *POLICIES FOR LOCAL PROGRAMMING ON COMMERCIAL RADIO STATIONS AND ADVERTISING ON*
CAMPUS STATIONS, [Public Notice CRTC 1993-38](#) (Ottawa, 19 April 1993).
- 63 The Commission may have raised these matters in its written exchanges with Pelmorex or at the
public hearing it held in Moncton following which it granted Pelmorex’ licence – these materials are not
available from the CRTC’s public website. (Public hearing transcripts from before 1998 are not available
on the [CRTC’s website](#).)
- 64 *Review of the Commission’s Policies for Commercial Radio*, [Public Notice CRTC 1997-104](#) (Ottawa,
1 August 1997).
- 65 *Commercial Radio Policy 1998*, [Public Notice CRTC 1998-41](#) (Ottawa, 30 April 1998), paragraphs
199 to 203.
- 66 *BROADCASTING DISTRIBUTION REGULATIONS*, [Public Notice CRTC 1997-150](#) (Ottawa, 22
December 1997), s. 1 (“Interpretation”).
- 67 *Ibid.*
- 68 *Ibid.*
- 69 *Commercial Radio Policy 1998*, [Public Notice CRTC 1998-41](#) (Ottawa, 30 April 1998), paragraph
203.
- 70 *Exemption order respecting public emergency radio undertakings*, [Public Notice CRTC 2000-11](#)
(Ottawa, 24 January 2000), paragraph 6.
- 71 *Proposal for an “All Channel Alert” system - Denied*, Decision CRTC [2001-123](#), 23 February 2001
(Decision [2001-123](#)) [Public Notice CRTC 2000-71](#) (Ottawa, 31 May 2000), at paragraph 2.
- 72 *Ibid.* at paragraph 2.
- 73 *Ibid.*, at paragraph 16.
- 74 *Ibid.*, at paragraph 17.
- 75 *Ibid.*, at paragraphs 6 and 20.
- 76 *Ibid.*, at paragraphs 10-13.
- 77 *Ibid.*, at paragraph 7.
- 78 *Ibid.*, at paragraph 21.
- 79 *Ibid.*, at paragraph 8.
- 80 Joint Federal/Provincial Commission into the April 2020 Nova Scotia Mass Casualty, Turning the
Tide Together: [Final Report of the Mass Casualty Commission, Volume 4, Community](#), Chapter 5 (“Public
Warning Systems”), page 167.
- 81 [Broadcasting Notice of Public Hearing CRTC 2006-3](#), (Ottawa, 2 March 2006), Item 1, Pelmorex
Communications Inc., Application No. 2004-1260-2. Pelmorex proposed to “broadcast alerts and
messages related to imminent or unexpected threats to life or property caused by severe weather
disturbances, natural disasters or other emergencies in local, regional and national areas of Canada for
distribution on the licensee’s services and on the other channels offered by BDUs that distribute the
licensee’s services.”

- 82 *Emergency alert services*, [Broadcasting Public Notice CRTC 2007-20](#) (Ottawa, 28 February 2007)
Paragraphs 2 and 3.
- 83 *Call for applications to provide an all channel alert (ACA) service*, Broadcasting Public Notice
CRTC [2005-38](#), (Ottawa, 22 April 2005).
- 84 [Broadcasting Notice of Public Hearing CRTC 2006-3](#), (Ottawa, 2 March 2006), Items 1 (Pelmorex
Communications Inc.), 2 (CBC) and 3 (Bell ExpressVu Inc. (the general partner), and BCE Inc. and 4119649
Canada Inc. (partners in BCE Holdings G.P., a general partnership that is the limited partner), carrying on
business as Bell ExpressVu Limited Partnership (ExpressVu).
- 85 CRTC, *TRANSCRIPT OF PROCEEDINGS BEFORE THE CANADIAN RADIO-TELEVISION AND*
TELECOMMUNICATIONS COMMISSION, Vol. 2 ([Gatineau, 2 May 2006](#)) at paragraphs 12200-12205.
- 86 *Ibid.*, paragraphs 12211-12214.
- 87 *Ibid.*, paragraphs 12215-12220.
- 88 *Ibid.*, paragraph 12219.
- 89 CRTC, *TRANSCRIPT OF PROCEEDINGS BEFORE THE CANADIAN RADIO-TELEVISION AND*
TELECOMMUNICATIONS COMMISSION, Vol. 2 ([Gatineau, 2 May 2006](#)) at paragraphs 12174 -12176.
- 90 *Ibid.*, paragraph 12237.
- 91 *Ibid.*, paragraphs 12344.
- 92 *Ibid.*, paragraph 12353.
- 93 *Ibid.*, paragraph 12181.
- 94 *Emergency alert services*, [Broadcasting Public Notice CRTC 2007-20](#) (Ottawa, 28 February 2007).
- 95 *Ibid.*, paragraph 17.
- 96 Chairperson, CRTC, *Transcript of Proceeding*, ([Gatineau, 31 March 2009](#)), at paragraphs 12-13:
...
9 We will also examine an application by Pelmorex Communications, under paragraph
9(1)(h) of the Broadcasting Act, requesting:
10 (a) the mandatory distribution of The Weather Network and MétéoMédia as part of
digital basic service; and
11 (b) to be approved as the national aggregator and backbone network distributor of
emergency alerts using the Common Alerting Protocol-Canadian Profile.
12 In February 2007, the Commission challenged the broadcasting industry to work
together to build and operate an emergency alert system, and come up with a solution
by February 2009.
13 Unfortunately, no such solution was found and, therefore, the Commission
commenced the current proceedings.
...
97 *Emergency alert services*, [Broadcasting Decision CRTC 2007-20](#) (Ottawa, 28 February 2007), at
paragraph 91.
- 98 *Pelmorex emergency alert service*, [Broadcasting Decision CRTC 2007-72](#), paragraph 14.
- 99 *Amendments to the Broadcasting Distribution Regulations-Emergency Alert Messages*, [Public](#)
[Notice CRTC 2007-83](#) (Ottawa, 17 July 2007, paragraphs 13-14.
- 100 *ExpressVu emergency alert service*, [Broadcasting Decision CRTC 2007-74](#), paragraph 2.
- 101 [Broadcasting Notice of Public Hearing CRTC 2006-3](#), (Ottawa, 2 March 2006).
- 102 *Emergency Alert Services*, [Broadcasting Decision CRTC 2007-73](#) (Ottawa, 28 February 2007),
paragraph 2.
- 103 [CBC National Alarm Centre Warehouse Addition](#), Phase 3, Drawing No. A-00 (23/09/2020).
- 104 *Pelmorex emergency alert service*, [Broadcasting Decision CRTC 2007-72](#), paragraph 16.
- 105 *Ibid.*, paragraph 19.
- 106 *Various cable broadcasting distribution undertakings in western Canada -Short-term licence*
renewals and licence amendments, [Broadcasting Decision CRTC 2008-234](#) (Ottawa, 28 August 2008), at
paragraphs 10-11. During the renewal of Shaw's cable BDUs an intervener set out concerns that these

had failed to carry extreme weather warnings in Manitoba; Shaw sent the intervener a copy of its response that the CRTC later described as not responding directly to the concerns the intervener raised: “[a]lthough Shaw copied the intervener in its reply, it did not address this issue specifically.”

¹⁰⁷ *Mandatory distribution order for The Weather Network and Météomédia*, [Broadcasting Order CRTC 2009-340](#) (Ottawa, 11 June 2009), paragraph 11.

Vice-Chairperson Katz dissented; among other things, he wrote that “the evidence indicated that during the five-year mandatory carriage period, TWN/MM would be guaranteed greater than \$260 million in revenue while the cost of developing and maintaining AADS over the same period is under \$12 million.”

¹⁰⁸ *Ibid.*

¹⁰⁹ *Ibid.*, paragraph 14 and Appendix.

¹¹⁰ CRTC, *Transcript*, ([Gatineau, 2 April 2009](#)), at paragraph 2670 (hearing secretary).

¹¹¹ *Ibid.*, paragraph 2964 (Mr. Temple).

¹¹² *Ibid.* paragraph 2968 (Mr. Temple).

¹¹³ *Ibid.*, paragraphs 2969-2979:

2969 THE CHAIRPERSON: Okay.

2970 What about the alternate scenario, the public service, for reasons of their own whatever they are, says “No, we actually wanted to -- we will proceed and we will do a total system including broadcasting, et cetera, and we designate you, but we designate you only as long and until such time as the Public Safety system is up and running”, which may be three years, maybe 10 years, maybe never, I have no idea what they are -- I'm just trying to ensure maximum flexibility.

2971 Is it necessary to designate you permanently or can we do it on a conditionality? Obviously we would have to put a sufficient time period in, until let's say the Public Safety system is up and running and has been there for one year, et cetera, before your designation ends.

Interim or temporary or “ten years”

2972 [Pelmorex] MR. TEMPLE: I guess we have concerns with that. I mean I think everyone understands that nothing is forever. Having said that, if this system is viewed as some kind of interim measure or temporary measure, first of all the risk to us then is significantly increased.

2973 Now, I can let Alysia talk about bankers and things of that nature, but just the whole message that that sends out to everyone who is going to be involved, because this does involve a lot of people, I think it's just the wrong message. It's almost ensuring that it will -- that there will be problems.

2974 THE CHAIRPERSON: Okay. Rather than a temporary system -- rather than a provisional system which I can see what you are saying in terms of giving you financing costs, would it be possible to do it for a fixed timeframe and say “We will review it then in light of developments which are taking place?”

2975 I mean as you point out in your own submissions national alert has been on the table for 20 years and nothing has happened. It's within our power to do this one piece, it doesn't cover everything but at least this one we can get up and running and will cover 90 percent of Canadians who have cable or satellite access.

2976 And we would say “Well, okay, we will do this, we will do it for a period of, let's say 5 years, 10 years and we will review it then in light of what the situation is at that point in time.”

2977 MR. TEMPLE: Ten years is certainly a lot more interesting than five years.

2978 THE CHAIRPERSON: Than five, yes, I think so.

--- Laughter

2979 MR. TEMPLE: The point -- I mean, as I said, nothing is forever and we understand that. We don't, as I think Pierre far more eloquently than I did, explained that we think the merits of the order do not rest solely on our provisioning of an alerting service, that we warrant distribution on basic regardless. We are quite happy to do this and, you know,

if -- but just making it -- having a sunset type of provision or review because of something else happening just adds significantly to our risk.

¹¹⁴ *Mandatory distribution order for The Weather Network and Météomédia*, [Broadcasting Order CRTC 2009-340](#) (Ottawa, 11 June 2009) at paragraphs 16-17.

¹¹⁵ Consisting of CRTC Chairperson von Finckenstein, Commissioner Peter Menzies and Commissioner Michel Moring: CRTC, *Transcript* ([Gatineau, 8 February 2011](#)).

¹¹⁶ *Mandatory distribution order for The Weather Network and Météomédia*, [Broadcasting Order 2009-340](#) (Ottawa, 11 June 2009), dissenting opinion by Commissioner Leonard Katz. Among other things, Commissioner Katz was concerned that subscribers to The Weather Network/MétéoMédia would be funding Pelmorex' Alert Aggregation and Distribution System (AADS):

...
I base this on a comparison of its own submissions in this application relative to the previous application filed by Pelmorex in Broadcasting Notice of Public Hearing 2007-1-1, where in return for mandatory carriage, Pelmorex was prepared to reduce the monthly rate for the service from \$0.23 to \$0.20 by 2010. This \$0.03 monthly reduction translates into \$3.8 million annually when one considers there are 10.7 million subscribers today paying for this service and \$19 million over the five-year mandatory carriage period granted in today's decision. In comparison, the record of this proceeding indicates that the capital costs to develop AADS by TWN/MM is approximately \$2 million over the first two years and \$2 million annually in operating costs for a total of \$12 million over the same five-year period. As a result, Pelmorex seems to benefit from a further \$7.0M in revenues – all coming from the additional \$0.03 per month per subscriber that Pelmorex proposed to retain under this application rather than reducing the rate as was proposed under the previous application, where Pelmorex did not offer to construct and maintain a NPAS. The only conclusion I can reach therefore is that Pelmorex has chosen to fund the enhancement from the \$0.03 that it had proposed to decrease in return for a mandatory distribution order in 2007.

....
¹¹⁷ *The Weather Network/Météomédia – Licence renewal and extension of the mandatory distribution of the service*, Broadcasting Decision CRTC 2011-438 (Ottawa, 22 July 2011), paragraph 34.

¹¹⁸ *Ibid.*, at paragraph 36.

¹¹⁹ *Ibid.*, at paragraph 38.

¹²⁰ *Ibid.*, at paragraph 40.

¹²¹ *Call for comments on proposed amendments to various regulations, to the standard conditions of licence for video-on-demand undertakings, and to certain exemption orders – Provisions requiring the mandatory distribution of emergency alert messages*, [Broadcasting Notice of Consultation CRTC 2014-85](#) (Ottawa, 27 February 2014), at paragraph 8.

¹²² *Ibid.*, at paragraph 14.

¹²³ *Ibid.*, at paragraph 9.

¹²⁴ *Ibid.*, at paragraph 14.

¹²⁵ BRP 2014-444 at paragraph 9: "Given that holding a broadcasting licence is a privilege, broadcasters and BDUs have a duty to inform the public of imminent perils." It is unclear why the Commission distinguished between broadcasters and BDUs as subsection 2(1) in the 1991 *Broadcasting Act* defined broadcasting undertakings to include distribution undertakings: "'broadcasting undertaking' includes a distribution undertaking, a programming undertaking and a network;"

¹²⁶ *Call for comments on proposed amendments to various regulations, to the standard conditions of licence for video-on-demand undertakings, and to certain exemption orders – Provisions requiring the mandatory distribution of emergency alert messages*, [Broadcasting Notice of Consultation CRTC 2014-85](#) (Ottawa, 27 February 2014), italics in original.

¹²⁷ *Amendments to various regulations, the standard conditions of licence for video-on-demand undertakings and certain exemption orders - Provisions requiring the mandatory distribution of emergency*

alert messages policy, [Broadcasting Regulatory Policy CRTC 2014-444](#) (Ottawa, 29 August 2014), paragraph 9.

¹²⁸ *Ibid.*, at paragraph 14.

¹²⁹ *Ibid.*, at paragraphs 15-16 and 23.

¹³⁰ *Ibid.*, at paragraph 24.

¹³¹ *Ibid.*, at paragraph 101.

¹³² *Ibid.*, at paragraph 4, italics in the original text.

¹³³ *Ibid.*, at paragraph 2.

¹³⁴ *Ibid.*

¹³⁵ *Ibid.*, at paragraph 81.

¹³⁶ *Ibid.*

¹³⁷ DM#2966519 Pelmorex, *Response to the Commission's Request for additional information in regard to the application filed by Pelmorex to renew the licence of The Weather Network/MétéoMédia – Application # 2017-0586-5* (11 September 2017), at page 13:

[CRTC question] a) Please indicate which BDUs, if any, does not currently offer both of your services.

Pelmorex Response:

More correctly, BDUs serving the vast majority of subscribers, carry both our services. Specifically, BDUs operating approximately 287 systems serving 8.6M subscribers do carry both our services. However, BDUs operating 725 systems serving 2.25M households do not carry both our services, even though there is no extra fee to carry the second service. The predicament arises not in the carriage of either or both services, but in communities with significant Official Language Minority Communities (“OLMC”) populations not having access to both TWN and MM or having to pay extra to receive our service in the official language of their choice. As far as Pelmorex is aware, there is no official Commission list of markets with significant OLMC populations, so one option explored was to require all BDUs to carry both services on the basic service.

Pelmorex recognizes this solution might be difficult or place an onerous obligation on every BDU, regardless of the OLMC population in the communities they serve. TWN/MM are open to any practical solution that would ensure there are clear rules governing the carriage of both TWN and MM so that OLMCs have access to both our services on the same terms and conditions.

¹³⁸ *The Weather Network/MétéoMédia – Licence renewal and renewal of mandatory distribution order*, [Broadcasting Decision CRTC 2018-342](#) (Ottawa, 31 August 2018).

¹³⁹ “Federal gov’t looking to expand emergency alerts to online platforms, devices” *The Wire Report* ([25 November 2020 10:42 AM EST](#)).

¹⁴⁰ *The Weather Network/MétéoMédia – Licence renewal and renewal of mandatory distribution order*, [Broadcasting Decision CRTC 2018-342](#) (Ottawa, 31 August 2018), at paragraph 3.