



19 December 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 2025-180-1 (Gatineau, 10 October 2025) – Reply 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 welcomed the CRTC's decision 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.

The CRTC has not explained its decision not to hold an appearing public hearing in this matter. FRPC notes that three of the 33 individuals who submitted comments through the CRTC's HTML system expressed their willingness to appear at a public hearing to provide further information to the Commission. We also note that intervener 68 had attempted to use the CRTC's 'online survey' system – the Conversations page? – but that it was not working "at certain points in time".

We continue to call on the Commission to reconsider holding a public hearing about this critical issue. It is clear that many people would like to be informed about emergent situations, but that alert fatigue brought about by the lack of tiered alerts and poor geographic targeting is driving them away from the very system established to protect their interests. Canadians should have the chance to express their concerns and proposals directly to the Commissioners making decisions about these issues.

Sincerely yours,

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Ottawa, Ontario



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

Replies to other interveners

Monica Auer
Executive Director
Forum for Research and Policy in Communications (FRPC)
19 December 2025

Contents

I	INTRODUCTION	1
II	CONCERNS REGARDING EXCEPTIONALLY NARROW SCOPE OF 2025-180 PROCEEDING	1
III	THE NPAS SYSTEM	3
A	Unaccountable	3
B	Role of National Alert Aggregation and Dissemination System Governance Council is Unclear	4
C	Opacity of National Alert Aggregation and Dissemination System Governance Council	5
D	Financial issues	8
 Appendix 1: Individuals' comments – summary		10
Appendix 2: Intervention 68		31

I Introduction

- 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. FRPC submitted its comments regarding the TBNoC 2025-180 notice of consultation on 21 November 2025.
- 2 In this reply to other parties the Forum reiterates its position that 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 FRPC is therefore gravely concerned by the Commission's resolute determination to consider changes to Canada's National Public Alerting System (NPAS) within the extremely narrow focus of the seven (7) questions set out in 2025-180.
- 4 The Forum's reply to other parties in this proceeding begins in Part II by noting the concerns raised by other parties about this proceeding's exceptionally narrow scope and paper-only focus. Parts III, IV and V address major issues raised by interveners concerning regarding the control, accountability and governance of Canada's National Public Alerting System, the availability of and Canadians' access to emergency alerts.

II Concerns regarding exceptionally narrow scope of 2025-180 proceeding

- 5 Mr. Marc Nanni submitted three procedural requests to the CRTC about this proceeding, on 7 October 2025, 8 October 2025 and 12 November 2025. Mr. Nanni strongly recommended that the CRTC hold a public hearing in this matter, and also asked that
 - the CRTC "place its own testing data, performance monitoring, and studies on the public record" (DM# 4931962, 12 November 2025, ¶¶11)
 - the CRTC obtain and add the following information to the 2025-180 public record:
 - the most recent independent, third-party security audit of Pelmorex for the National Alert Aggregation and Dissemination (NAAD) system, conducted within the last 24 months; and,
 - detailed annual financial statements for the NAAD system, since 2010, itemizing revenue from the television subscriber fee and detailing expenses related to system operations, maintenance, modernization, and security.
- 6 The CRTC responded to Mr. Nanni's requests on 21 November 2025, the deadline for interventions in this proceeding.

7 Parliament has long required that the Commission engage with the public. It has in fact been conducting public consultations since 1968, nearly 60 years. Leaving procedural request unanswered for weeks – just over six, in Mr. Nonni’s case – shows either disregard for or disinterest in interveners or an inability to manage work within the Commission.

8 Moreover, while parties familiar with the CRTC’s *Rules of Practice and Procedure* direct their procedural requests to the Commission – through its Secretary General – many procedural requests are today signed by Commission staff. Even granting that the Commissioners themselves may delegate their answers to the CRTC’s staff, these letters do not actually state that they are being sent under the direction of the CRTC Commissioners deciding the processes about which the requests are being made.

9 It is therefore unclear not only why it is taking so long for requests to be addressed, but who is actually making these decisions.

10 The CRTC should reschedule the consultation regarding its *Rules of Practice and Procedure* – previously scheduled by the CRTC’s 6 May 2024 version of its *Regulatory Plan to modernize Canada’s Broadcasting Framework* and de-scheduled by its 15 November 2024 version of its plan. This would enable interested parties to make suggestions regarding the CRTC’s procedures and practices in its telecom and broadcasting proceedings.

FRPC Reply Recommendation 1 Reschedule the *Rules of Practice and Procedure* consultation dropped from the CRTC’s 15 November 2024 *Regulatory Plan to modernize Canada’s Broadcasting Framework*

11 The Forum notes Pelmorex’ comment that “the CRTC has initiated this opportunity to gather input from the broadest spectrum of Canadians” (¶11).

12 Apart from the interveners who often participate in these proceedings – broadcasters, telcos, public-interest organizations – just over 50 people filed interventions using the CRTC’s online-filing system (see table to right).

13 The comments came from six provinces and a single territory. This proceeding simply does not represent ‘the broadest spectrum of Canadians’ as it has not received any comments from Nunavut, the Northwest Territories, Saskatchewan, Newfoundland and Labrador, New Brunswick or Prince Edward sand.

14 It may well be that hundreds, perhaps thousands of individuals submitted comments through the American-operated CRTC *Conversations* portal – but no information from

Province or territory	Number of comments
YT	2
BC	6
AB	2
MB	1
ON	31
QC	8
NS	3
Total	53

that portal appears to be included on the CRTC's 2025-180 webpage. As of 2:28 PM ET today it listed only these documents:

Replies
ASL videos – 15 July 2025
Costs
DWCC letter to the Commission
Interventions
Neil Squire – Study on Canadian Emergency Alert Accessibility
O2025-302
Procedural requests
Reply from CRTC staff to DWCC
Staff Letter 10 September 2025
Staff Letter 12 December 2025
Staff Letter 15 December 2025
Staff Letter 18 December 2025
Staff Letter 21 November 2025 - FRPC
Staff Letter 21 November 2025 - Marc Nanni

15 Why were the *Conversations* comments not available by today's first-reply deadline?

III The NPAS system

A *Unaccountable*

16 No single party appears to be accountable for today's Canada's National Public Alerting System. Rather, many organizations and companies are involved, including ISED (telecommunications; radiocommunications), CIC (broadcasting), the CRTC (telecommunications and broadcasting), the federal department of Public Safety, the provinces and territories and Pelmorex.

17 The Canadian Telecommunications Association comments (Reply, ¶9) that the Commission's authority is limited to last-mile distributors. Though true, the Commission also has some authority regarding the operator of the National Alert Aggregation and Dissemination System: Pelmorex states in its intervention (¶1) that

Pelmorex Weather Networks (Television) Inc. ("Pelmorex") is the broadcasting licensee of the Canadian specialty services The Weather Network ("TWN") and MétéoMédia ("MM"), Canada's trusted sources for weather forecasts, news and emergency alerts, on television, the web and apps. As part of its licensed broadcasting undertaking **Pelmorex built and operates the National Alert Aggregation and Dissemination** ("NAAD") **System**, which authenticates emergency alerts issued by public officials and disseminates these messages to broadcasters (radio and television), cable and satellite television distributors, wireless service providers, and other parties for dissemination to the public.
[bold font and italics added]

18 That said, Pelmorex also states (¶13) that it “will undertake any technical change that is directed to implement” – but not if that direction comes from the CRTC. It states rather than “any technical changes to the NAAD System that may be encouraged or required by the CRTC through policy would need to be appropriately prioritized by Council to complete” (¶13). Insofar as concerns about languages – serious concerns because people who cannot understand Canada’s official languages clearly at times of stress cannot take recommended actions to protect themselves – we also note Pelmorex’ view (¶30) that “it may be premature for the Commission to take specific regulatory measures at this time to support the distribution of alerts in languages other than English and French, including Indigenous languages”

19 It is unclear, however, whether the National Alert Aggregation and Dissemination System and the Governance Council are performing today as they were expected to perform in the early 2010s, or as needed today. A second result of diffuse lines of authority is that currently no one party can be held to account for NPAS problems.

20 Pelmorex submitted in its intervention that “a more effective, long-term solution, would be to undertake technical changes to the NAAD System and NPAS overall that would enable Canadians to select a preferred alert language on their device ...” (¶27). We agree. That said, we also believe that it is unreasonable to continue to burden the private sector with a responsibility that rests properly with the federal government. We also consider that the CRTC must to some degree lead initiatives in broadcasting and telecommunications – to the extent of beginning to design a replacement for an alerting system that may no longer the needs of Canadians today or going forward.

B Role of National Alert Aggregation and Dissemination System Governance Council is Unclear

21 When the CRTC renewed Pelmorex’ licence for The Weather Network/MétéoMédia in 2011, it noted “concerns relating to governance, specifically relating to the effectiveness of the Governance Council for example, that the role and the scope of the Council are limited and ... that it has evolved into an advisory body rather than one providing direction to Pelmorex.”¹ The CRTC required Pelmorex to “take direction from the Governance Council” about certain matters including those “relating to the [Common Alerting Profile] CAP compliance of alerts and equipment and to ongoing technical enhancements of the system” and to file “the Terms of Reference for a Threat Risk Vulnerability Assessment by no later than 24 October 2011.”²

22 In 2018 the CRTC said that it had heard “concerns regarding governance, and specifically the effectiveness of the Governance Council.”³ The Commission said there should be “a comprehensive, transparent and accountable governance framework”⁴ for the Council. It required Pelmorex to submit a report about “matters pertaining to the structure and operations of the Governance Council” which the CRTC then intended “to make ... public on its website.”⁵ We remain unable to locate this report.

C *Opacity of National Alert Aggregation and Dissemination System Governance Council*

23 The governance structure of the National Alert Aggregation and Dissemination System remains opaque. Pelmorex described it in 2010 as consisting of up to 29 unidentified members, from the federal and provincial governments, broadcasters, the Canadian Association for Alerting and Notification (CAPAN) (that became the Canadian Public Safety Operations Organization in September 2014):

- (a) Up to four members, each of whom holds an executive-level position within a federal government department or agency (i.e. Director General or above), shall be appointed to the Council by the federal government.
- (b) Up to thirteen members, each of whom holds an executive-level position within a provincial or territorial government department or agency, shall be appointed to the Council by provincial and/or territorial governments. For greater certainty, each provincial and territorial government may appoint a maximum of one representative to be a member of the Council.
- (c) Up to four members each of whom holds an executive-level position shall be appointed, representing one English-language broadcaster and one Frenchlanguage [sic] broadcaster as well as one distributor that serves an anglophone market and one distributor that serves a francophone market.
- (d) Up to one member representing all Canadian public broadcasters (i.e. the Canadian Broadcasting Corporation and the provincial educational television programming undertakings).
- (e) Up to one representative from the Canadian Association for Public Alerting and Notification ("CAPAN") shall be appointed.
- (f) Up to four members shall be appointed by Pelmorex from among its senior officers or corporate Board.

(Pelmorex, DOCS-#1508551-v1-2010-1511-5_-Undertakings_-
_Pelmorex_Alerting_Governance_Council_Terms_of_Reference_-
_Mandat_et_Cadre_de_Reference_-_Adopted_12_nov_09.pdf)

24 "Updates" about the "NAAD System Governance Council" are posted on the alerts.pelmorex.com website in relation to meetings of the Council from 8 October 2019 to 8 October 2025.

25 Pelmorex states that the Council "includes representatives from each province and territory, Public Safety Canada, Environment and Climate Change Canada, Natural Resources Canada, the Canadian Association of Chiefs of Police, as well as many last mile distributors ("LMDs")" (¶7).

26 But are these representatives present at every meeting? The Council 'Updates' do not set out attendance information – see e.g. the most recent [Update of 8 October 2025](#) (issued on 14 October 2025). A [publicly-available access-to-information response](#)

appears to list those attending a National Alert Aggregation and Dissemination System Governance Council meeting held on 13 October 2021:¹

NAAD SYSTEM GOVERNANCE COUNCIL

MINUTES OF THE MEETING OF THE NAAD SYSTEM GOVERNANCE COUNCIL held via video conference at 10:00 am EDT on October 13, 2021.

Attendees:

Provincial/Territorial Agencies		Last Mile Distributors	
Alberta	Stephen Carr Meghan Thomas	Bell	Lenore Gibson
British Columbia	Pader Brach Brendan Ralfs Sonia Woolford	CBC	Anne-Marie Migneault
Manitoba	Ashley Keep	CCSA	
New Brunswick	Stacey Cooling Pete Lussier	Cogeco	Simon Desrochers
Newfoundland and Labrador		CWTA	Ursula Grant Tania Baillie
Northwest Territories		Golden West Radio	
Nova Scotia	Jason Mew Rodney Legge	NCRA	Barry Rooke
Nunavut		Rogers	Simon-Pierre Olivier
Ontario	Teepu Khawaja Chris Pittens	Shaw	Dean Shaikh
Prince Edward Island	Tanya Mullally	Telus	Careen Unguran
Québec	Vincent Auger-Soumis Joshua Ménard-Suarez		
Saskatchewan			
Yukon			

Federal Agencies		Pelmorex
Environment and Climate Canada	Ken Macdonald Erik de Groot	Maureen Rogers Martin Bélanger
ISED		Omar Gilani Karen Kheder
Natural Resources Canada	David McCormack	Sam Sebastian
Public Safety Canada	Stéphanie Durand Arjun Vinodrai Rob Macdonald Monique Grabowski	Alex Leslie Matt Majeski Melissa Faye

¹ Response Package EMB=2021-15252.pdf, page 460 of 487.

27 Pelmorex' intervention states (¶6) that it both chairs and co-chairs the Council. The list of those attending the Council's 13 October 2021 meeting includes eight representatives from Pelmorex and unidentified representatives from the CCSA and Golden West Radio . No one attended this meeting on behalf of the governments or agencies of Yukon, Northwest Territories, Nunavut, Saskatchewan as well as Newfoundland and Labrador, and no one attended on behalf of ISED.

28 While Pelmorex states (¶6) that it "has continued to take a leading role in the evolution of public alerting in Canada", it also states (¶12) that it "does not unilaterally determine the technical direction of the NAAD System, especially when it pertains to new features and enhancements for alert issuers" but that it "receives direction and advice from Council on the technical needs and evolution of the NAAD System".

29 In reality, no evidence about the relationship between the Council and Pelmorex is available on the public record. The 'updates' of the Governance Council meetings do not show who attended, specifics of what was discussed, what matters were voted, how attendees voted or what actions were taken due to the Council meetings. It is unknown whether the National Alert Aggregation and Dissemination System Governance Council's Terms of Reference have changed, or why. The governance of the National Alert Aggregation and Dissemination System is entirely opaque, raising legitimate questions about the direction and accountability of a key component of Canada's National Public Alerting System.

30 It is impossible to dispute Pelmorex' statement that its operation of the NAAD system has given it "unparalleled insights from working directly with all public alerting partners, including Canadians who receive alerts" (¶7). Pelmorex also states that the National Alert Aggregation and Dissemination System "combines the initiative and motivation of the public and private sectors to save lives" (¶5).

31 Yet comments from those working as emergency alert providers set out serious concerns (see e.g. Appendix 2). Comments from individuals in this proceeding also raised concerns ranging from the system's use of the highest alert for all alerts leads not just to 'alert fatigue' but to serious anxiety issues, the computer-generated verbal announcements that are garbled (L. Boulet, intervention 1) or abbreviated (M. Nanni, 7 October 2025 Intervention 53, paragraph 14), or that are fully or partially inaccessible (Interventions 68, 82).

32 Moreover, times have changed since the National Alert Aggregation and Dissemination System began to be established a decade and a half ago. For one thing, Canadian law has changed.

33 The *Accessible Canada Act* requires that people be able to participate equally within Canadian society – and that must mean that their concerns are taken into account in the NPAS and in the National Alert Aggregation and Dissemination System:

accessibility organizations should have a voting seat (or more than one) at the Council's table. Canada's approach to official-language minority communities has also changed, as has the relationship between the Crown and Indigenous communities. The public interest – in general, with respect to languages used, accessibility and Indigenous concerns – must be recognized by including representatives of these organizations as voting members of the National Alert Aggregation and Dissemination System.

D *Financial issues*

34 The public updates for the Alerting Governance Council do not address the NAAD System's funding. The Agenda for the 13 October 2021 meeting includes, however, a "Financial Update" (Item 4a):

Agenda:

Morning Session (10:00 am EDT)

1. Introductions
 - a. Welcome, Attendance and Agenda
 - b. Review of Minutes and Action Items from Last Meeting
2. Update from SOREM
3. Governance Updates
 - a. Terms of Reference
 - b. s.13; s.16
4. NAAD System Program Update and Alert Ready Mobile Application
 - a. Financial Update
 - b. New Alert Interface Status Update and Next Steps
 - c. Wireless Public Alerting
 - d. Alert Ready Mobile Application
 - e. 2021-2022 NAADS Program Priorities and Roadmap

Afternoon Session (1:00 pm EDT)

5. Future Evolution of the NAAD System
6. Update on Alert Ready Communications Activities
7. Roundtable: Members Status Update and Q&A
8. Review Action Items, Next Meeting(s) and Adjourn

35 Pelmorex states in its intervention (¶¶12-13) that it receives its direction from the Council, and considers direct expenditures in terms of its most recent licence renewal. It adds, though, that the Council would have to address “any technical changes to the NAAD System that may be ... required by the CRTC ... would need to be prioritized by the Council to complete” and would change other priorities that it had directed Pelmorex to complete:

Pelmorex does not unilaterally determine the technical direction of the NAAD System, especially when it pertains to new features and enhancements for alert issuers. Rather, Pelmorex receives direction and advice from Council on the technical needs and evolution of the NAAD System. NAAD System direct operational and capital expenditures are subject to a NAAD System incremental cost budget committed to by Pelmorex during its most recent licence renewal. System upgrades and enhancements in particular are undertaken by Pelmorex within that stated fixed budget and are prioritized mainly by federal, provincial and territorial (“FPT”) users of the NAAD System. The order of priority for technical work is typically agreed on by FPT NAAD System users in separate meetings before being presented to Pelmorex and to Council for approval. Relevant to this proceeding, Pelmorex will undertake any technical change that is directed to implement. However, any technical changes to the NAAD System that may be encouraged or required by the CRTC through policy would need to be appropriately prioritized by Council to complete, and would subsequently alter the current order of priority upgrades that Pelmorex has been directed to complete. Timelines for undertaking and completing any new technical changes would be subject to Pelmorex's existing resources. Pelmorex is able to comment on potential specific timelines if requested.

36 The Forum is concerned that it would be unreasonable to continue to burden the private sector – Pelmorex - with the responsibility to upgrade the National Alert Aggregation and Dissemination System to meet performance standards not just for 2026, but planning ahead, to (say), 2040 – which, after all, is just fifteen years away. As Pelmorex comments at ¶34, “[a]ddressing alert accessibility is the responsibility of all NPAS stakeholders.” The federal government should take the lead role in this endeavour and allow Pelmorex to devote its time to its broadcast services.

Appendix 1 Individuals' comments

Name	Municipality	Int. #	Comments	Recommendations
Audette, K	North Bay	ON 35	System's geotargeting system does not work and causes stress	Weather apps provide "better alerts than your alerts do"
Boulet L	Lac-Beauport	QC 1	[Original in French] Improve the quality of speech in the messages; the computerized voice is often incomprehensible and is unable to pronounce words in English (in a French message)	Improve the comprehensibility of messages
Chase, D	Abbotsford	BC 11	People should be able to opt out of receiving urgent alerts	Or have the ability to silence the alerts without affect the device' other functions
Corrado, N	Beaconsfield	QC 61 PH	The alert sounds cause panic attacks and could make people drop their phones	Please remove the alarm sounds
Coutu, M	London	ON 33	[original in French] Some regions continue to lack good cellular coverage and cannot receive emergency alerts	Please consider those who lack good cellular coverage

Name	Municipality	Int. #	Comments	Recommendations
Croteau, C	London	ON 28	Does not reach streaming service users	Do social media accounts distribute alerts?
Creery, C	Ottawa	ON 92	Alert messages startle people while driving and create anxiety	Permit alerts to be disabled
Dnes, W	Vaughan	ON 51	<p>*Extensive comment*</p> <p>As NPAS uses highest alert level (not Amber), it has lost Canadians' trust, leading to many to turn off their mobile phones at night</p> <p>Notes re Q4 that disabilities also include sleep disorders; draws parallels to increased accidents following daylight savings-time changes</p> <p>Re Q5(c) and WSPs: "Q5(c) The fact that this question is even being asked raises doubts about the competency of the Commission. The WSPs are banging the drums about 3G going away by the end of this year. You guys regulate the WSPs. How can you possibly NOT know of the upcoming demise of 3G?"</p>	<p>CRTC should commission independent analysis to determine whether unblockable alerts are related to traffic accidents</p> <p>Permit opt-in</p> <p>Proposes direct satellite-to-mobile phone to improve coverage in unserved areas</p> <p>Notes that fed govt "sat on the initial Starlink ISP application and did nothing for *MONTHS*. It got so bad that an MP had to submit a petition to the House of Commons"; says CRTC should approve (telecom distribution) applications quickly</p> <p>Perfection must not be the enemy of the good</p>

Name	Municipality	Int. #	Comments	Recommendations
Forder, S	Orillia	ON 119	Requires more geographic specificity	Strengthen geofencing to increase confidence in system
Fortin, L	Montréal	QC 126	[Original in French] Announcements incomprehensible	Close NPAS or Permit opting out Stop radio/TV & mobile issuing warnings simultaneously
Fung, K	Whitby	ON 42	“ ... I immunize students for work, if my phone were to sound an alarm mid-injection, I could injure my client or myself due to jumping from the noise, for example. ...”	“Alerts should still be mandatory (cannot turn off notification), but there should be an option to mute the alarm/sound or switch it to vibrate only.”
Hammerl, P	Hamilton	ON 89	Excessive messages at ‘top tier’ create alert fatigue	Permit different levels of alert
Hayward, G	Fall River	NS 85	“Cellular notification does not work unless you have a data plan. Many people use a cellular phone for voice calls and no data plan.”	
Hollinger, G	Wasaga Beach	ON 82	The alert sounds are overwhelming	Permit volume to be reduced or muted; enable message to be replayed (or require

Name	Municipality	Int. #	Comments	Recommendations
Hopkins, R	Tagish	YT 127	<p>Messages lost by accident (exiting the alert system before reading the message)</p> <p>* extensive submission *</p> <p>1. Standards Compliance – inconsistent data quality in CAP messages</p> <p>2. Continuous Dedicated Test SGC Resource - Current system lacks continuous, practical tests; all end points and stations cannot reliably verify compliance</p> <p>3. Reporting Transparency and Privacy - Reception/reporting relies on scattered non-Canadian forms and offers poor feedback and privacy assurance</p> <p>4. Security and Vulnerability Disclosure - Stakeholders lack proactive notification of security issues; communication hygiene is lacking</p>	<p>acknowledged messages to close the system)</p> <ol style="list-style-type: none">1. Implement a dedicated test SGC signal and continuous CAP test feed.2. Enforce CAP X.1303 profile conformance with published validation, test suites, and annual checks.3. Establish a Canadian-hosted reporting portal with transparent privacy/data residency and feedback tools.4. Create a national coordinated vulnerability disclosure program and improve communications with established standard business practices.5. Ensure full Unicode and multi-language support end-to-end, including Indigenous languages.

Name	Municipality	Int. #	Comments	Recommendations
			<p>5. Indigenous Languages & Accessibility - Multi-language support is inconsistent and not fully realized</p> <p>6. Attachments, Storage, and Bandwidth - large/embedded CAP attachments strain bandwidth and device storage</p> <p>7. End-User Experience and Alert Fatigue - Alert fatigue and late-night notifications drive users to disable systems</p> <p>8. Remote Indigenous Community Resilience (LPFM and 91.1 MHz) - Many indigenous and remote communities lack cellular coverage (when available, it is, very expensive) excluding seniors and those on fixed incomes left relying solely on FM radio if there is anything at all.</p> <p>9. Maintenance, Updates and Station Accountability - Station-side responsibility is often unclear</p>	<p>6. Update attachment size/type/retention guidelines to prevent endpoint overload.</p> <p>7. Coordinate with ISED and CRTC on streamlined LPFM emergency radio for remote indigenous communities (utilizing 91.1 MHz).</p> <p>8. Maintain a registry of responsible technical contacts for stations.</p> <p>9. Require issuing authorities to use CAP validators, standardized templates and provide targeted operator training.</p> <p>10. Ensure correct alert taxonomy and labeling on Canadian devices (with carriers and manufacturers).</p>

Name	Municipality	Int. #	Comments	Recommendations
			10. Operational Quality Assurance - Persistently malformed CAP messages continue from some authorities.	
Johnson, A	Camrose	AB	50 Cell phone coverage in rural areas is limited; regularly drives in area 45 minutes outside Edmonton without coverage	Regulate basic coverage in all areas to ensure people in those areas can be warned
			Reduced radio and increased streaming use, meaning warnings not received	
Lacelle, F	Oshawa	ON	75 Alerts for issues hundreds of miles away wake people for no reason and create problems for people with autism or auditory sensitivity	Provide opt-out option Enable pop-ups on phone screens
Laforest, E	Toronto	ON	93 Alert level option omitted	Implement all alert levels
Langdon, M	St. Clements	ON	91 Loud, annoying and disruptive sound	Permit vibration and text-only notifications
Lauzon, B	Sherbrooke	QC	95 [Original in French] Intrusive; beyond government's mandate; should be voluntary	

Name	Municipality	Int. #	Comments	Recommendations
Lefebvre, S	Ottawa	ON 15	Alert sound volume is dangerous and could cause accidents	"It would be better that someone say Alert! Alert! To prepare people for the disturbing sound. You should place safety first and NOT catch people by complete surprise and then cause an accident."
Legg, D	Fort Frances	ON 36	Supports public-alerting system but lives in remote area between Thunder Bay and Winnipeg; receives alerts from southern Ontario or Manitoba	Use cell phone towers, not regions, to alert cell phone users in those areas about alerts
McDonell, C	Winnipeg	MB 128	Requires more geographic specificity; Lacks accountability	Should be owned by Govt of Canada;
Moore, S	Barrie	ON 101	Device override limits users' ability to control their devices' behaviour during work, transportation, overnight settings System prevents opting out, reducing alert volume, disabling non-critical categories, distinguishing between alerts and information	Use a system proven to work Clarify whether the mandatory audio override is a regulatory requirement or industry implementation choice. Introduce tiered user controls that allow disabling non-critical alerts (tests,

Name	Municipality	Int. #	Comments	Recommendations
Moreau, S	Montréal	QC 34	<p>No clear, accessible documentation explaining why system works as it now does, leaving system non-transparent</p> <p>Accessibility principles require change regarding sound volume, as do certain professional environments</p> <p>[Original in French]</p>	<p>informational notices) while preserving imminent-threat alerts.</p> <p>Require that WPA respect device volume settings except for the highest-severity alerts.</p> <p>Improve transparency by publishing a clear explanation of technical and policy constraints governing WPA behaviour.</p> <p>Evaluate accessibility implications and consult with disability-advocacy groups on acceptable alert formats.</p> <p>Consider a public education component about WPA categories and future system refinements.</p> <p>Ensure geospatial targeting by NPAS when alerts distributed by SMCS</p>

Name	Municipality	Int. #	Comments	Recommendations
Murphy, G	Sudbury	ON 84 PH	<p>ISED SMSE-006-24 invited comments on how supplemental satellite coverage could deliver alerts to mobile devices</p> <p><u>SMSE-001-25</u> (Feb/25) said:</p> <p>¶110: “the CRTC could undertake the work necessary to ensure SMCS's ability to support the distribution of emergency alerts”</p> <p>¶113: “ISED expects that the CRTC will undertake a review of its existing emergency services framework in a timely manner to consider how SMCS ability can support 9-1-1 access and WPA”</p> <p>“The approval criteria in the process to issue a warning is too restrictive. Second to that, the fear of public ... outcry for issuing alerts that they deem not appropriate weighs heavily on those making the decision. “</p>	<p>“Alerts need to be seen more as a public potential [sic] warning service and not just a means to warn of an imminent threat to life.”</p>
Nanni, M	Gatineau	QC 53	* Extensive submission *	<p>37 Among reply comments,</p>

Name	Municipality	Int. #	Comments	Recommendations
			<p>"After exhaustive research and submission of documented evidence of systemic failure, the Commission Staff has ruled the core issues—security, financial transparency, and governance—"out of scope." This proceeding, focused on "targeted improvements" to a condemned system, is therefore an exercise in bad faith. It asks stakeholders to polish the brass on a sinking ship while forbidding discussion of the hull breach. I"</p>	<ul style="list-style-type: none">• To discuss "alerting gaps" while forbidding analysis of the financial model that prices out communities is absurd.• To discuss "compliance" while forbidding examination of the security vulnerabilities that compromise the system's integrity is negligent.• To discuss "language" while forbidding scrutiny of the governance and issuance protocols that lead to the longstanding issues of alerts not being sent at all, or the longstanding language inconsistencies. is a farce."
Needemyer, D	Toronto	ON 14	Does not want to receive the messages	Provide opt out option
Picard, Y	Toronto	ON 27	<p>38 "If this system is meant to prompt public action, it needs to be timely, relevant, and non-punitive.</p>	Provide tiered alerts

Name	Municipality	Int. #	Comments	Recommendations
Plunkett, S	Ottawa	ON 6	<p>39 Otherwise, it's akin to having our TVs forcibly turned on in the middle of the night—something we'd never tolerate from broadcasters, yet is happening on our phones without recourse."</p> <p>"Waking me up in the middle of the night with an amber alert from hundreds of kilometers away is not helpful - I will not be able to have any way to help."</p>	Allow tiered alerts
Pritchard, Mr.	London	ON 40	<p>Amber alerts being sent at 'missile crisis' level</p> <p>Causes anxiety and stress</p> <p>You won't pay me for damages causes by this</p> <p>You don't care</p>	"Fix it"
Roberge, R	Brigham	QC 29	<p>[original in French]</p> <p>Loud alert signals can cause accidents or medical crises</p>	The signal should be improved so that it begins quietly and increases in volume



Name	Municipality	Int. #	Comments	Recommendations
Roberts, M	Peterborough	ON 79	System requires investment and oversight	Needed: Timely upgrades as mobile phone upgrade Federal Minister with oversight power Available beyond 4k networks, to serve the North SMS availability Quiet alerts
Rudik, P	Toronto	ON 94	Highly stressful for neurodivergent population	Offer options for notifications: vibrations, flashing display
Sargent, R	Bolton	ON 2	[none]	"Why aren't alerts provided via unique URL's by region available on the Alert Ready website? This would allow broadcasters to incorporate the URL right into their automation software, or at the transmitter site, bypassing costly SAGE boxes and

Name	Municipality	Int. #	Comments	Recommendations
Schafer, C	Kitchener	ON 81	Alert fatigue weakens system	possibly increasing the adoption rate of the program."
Schlosser, M	Edmonton	AB 37	Wireless alerts delivered solely at 'extreme threat' level Weakens public trust and engagement Not a user-centered framework	Use all tiers, not just highest priority Use all levels of alerts Let users opt out of non-critical alerts including scheduled tests Ensure "mandatory receipt of life-threatening emergencies"
Seica, M	Toronto	ON 109	[Extensive submission] 40 "all wireless alerts are pushed on to the population's mobile devices, regardless of the type, importance or criticality of the alerts."	Customize alert levels (includes evidence from other jurisdictions) More precise geospatial targeting Provide more options for devices Enable quiet hours for alerts
Simard, P	Chicoutimi	QC 88	[Original in French]	Alerts should be optional

Name	Municipality	Int. #	Comments	Recommendations
Smith, G	Upper Hammonds Plains	NS 49 PH	<p>Alerts should not be imposed</p> <p>(Extensive submission)</p> <p>Did not receive emergency alerts re wildfires issued in Aug/25 because it was on vibrate/silent (Google Pixel 8 Pro, Android 6, MSP = Rogers; purchased from Rogers in Spring 2024)</p> <p>Has BA & MA in computer science but cannot configure the settings to receive the alerts</p> <p>Notes users can opt-out of receiving wireless alerts "in just THREE CLICKS"</p> <p>Since approx. 40% of Canadian market uses Android device, creates significant risk of danger</p> <p>Also, as does not have cable or radio, highlights importance of mobile alerts being attention setting</p>	<p>Standardization required across telephones</p> <p>Should be mechanism to enable cell phone users to receive test alert to ensure NPAS working properly for them</p> <p>Do not allow opting out</p>

Name	Municipality	Int. #	Comments	Recommendations
Smith, J	Woodbridge	ON 3	[none]	"Stop sending amber alerts with the highest presidential-level alert on cellphones. Implement alerting tiers similar to the US."
Snook, A	Kingston	ON 20	Alerts should not be imposed - freedom of choice - non-custodial-parent abductions hours away irrelevant to them	Allow users to turn off alerts
Stroeder, N	Kelowna	BC 13	"Canada has open borders, ... does not fund the military in a meaningful way, it does not allow citizens to protect themselves, ... no bomb shelters, ... no civil defense programs"	"...I'm not interested in the Governments self made crisis's and would like the ability to opt out of all unsolicited communications."
Tam, V	Langley	BC 12	"Amber alert should not included in the alert system."	[none]
Thow, A	Ottawa	ON 73	People wearing Bluetook-connected hearing aids receive louder than normal alerts, which can be startling and create health issues	Provide information for those who are blind, hard of hearing, deaf on how to change alerts' volume

Name	Municipality	Int. #	Comments	Recommendations
Tsang, A	Ottawa	ON 41	Amber alerts being distributed at 'national alert' ("presidential alert") level	Wireless Emergency Alert system has a category for Amber Alerts that should be used for NPAS
Tsui, J	Mississauga	ON 86	"The cellphone alert system technology that the provider is built on top of the American Wireless Emergency Alerts standard, which supports four different types of alerts based on severity. The current provider in Canada only uses the highest tiered alert for all alerts regardless of content. For most phone models, this level of alert triggers an audible warning that does not respect do not disturb or silent modes."	"We need to change the system to have more flexibility with separate alert tones for each type of alert. The highest tiered alerts that force an audible warning regardless settings should be reserved for potentially dangerous situations where people need to immediately seek safety. ... these alerts should only issue an audible alert if a phone's do not disturb function is off."
Tutty, D	Faro	YT 83	"Here in the Yukon, cell service is only available in communities, not on the highway in-between (generally one tower in each community except Whitehorse), and only when both electricity and internet are working. The same applies to broadcast radio. Driving time from one community to the next can range from 1-3 hours."	"An alert system should use multiple means of communication: email (able to subscribe, for example, based on postal codes), text (sent out based on geographical area via however many towers cover the area) and broadcast radio. There should also be a RSS alert for web browsers (Environment Canada has this). Here in the Yukon,

Name	Municipality	Int. #	Comments	Recommendations
Ubhi, A	Vancouver	BC 32	"...Would it be possible for people who will be out of coverage to purchase an inexpensive receiver of perhaps a satellite signal (a satellite version of the WeatherAlert system)? Is there any existing capability in the GPS system to piggy-back an alert to receivers? Some people go out on the land with a satellite phone: the alert system needs to work with them (if they're turned on, or if the alert is still active when they're turned on)."	communities usually have a "fire" siren. Not everyone has a cell phone nor listens to the radio all the time. The system should activate the siren every 5 minutes while active so that people will check the radio for the message. The message needs to repeat every 5 minutes or so"
Whitehead, J	Thunder Bay	ON 4	"...Insisting on loud alerts 24/7 could in fact be harming some citizens that should not be negatively affected by your public alerting system. I cannot put my phone on airplane mode in case my 90 year old mother has an emergency. ..."	"... the challenge increase the farther north you go. There's a lot of Canada north of 60 where GPS starts to degrade. Signals from satellites in Tundra Orbits would solve this." [None]

Name	Municipality	Int. #	Comments	Recommendations
Wiebe, D	Burnaby	BC PH	Supports opt-in but not mandatory alerts in non-official languages	
Wilson, A	Halifax	NS	78 Addresses single-tier alert sound	Separate sounds for different alerts (AMBER vs shelter in place)
Wong, G	Vancouver	BC	68 * Extensive comment * “feedback from a group of public alert issuers in a local municipal government context” Provinces and territories offer inconsistent access to NPAS alerts: “Current basic training and knowledge on public alerting is self-sought and only acquired between peers, if available.” Uneven access to NPAS across Canada means government public issuers are buying their own, different systems => has led to disjointed emergency information environment	<ul style="list-style-type: none">1 Ensure consistency of NPAS system across jurisdictions2 Disallow opting-out; rather, ensure technological accessibility, readability, reliability and standardization across public-alert issuers3 Ensure availability of alerts over 3G4 Permit local alert issuers to issue alerts to their community based on threats to life, not type of hazard

Name	Municipality	Int. #	Comments	Recommendations
			<p>“Currently, the public has different expectations of when NPAS will be used depending on where they live in Canada.”</p> <p>Limiting mobile alerts to LTE/5G devices excludes those served by 3G</p> <p>Policy non-compliance because governments require alerts to be issued in specified languages that NPAS character incompatibility prevents and public-alert issuers are translating <i>ad hoc</i></p> <p>Third-language communities should have reliable information</p> <p>Absence of consultation with persons with disabilities</p> <p>“Without evaluation of compliance and consequences of non-compliance, the tool is not a strong tool and is vulnerable to failure.</p> <p>Technological issues have happened recently in the United States during wildfires and have been</p>	<ul style="list-style-type: none">5 Establish formalized training curriculum about NPAS and public alerting6 Internet apps such as Alertable are being used by [an unknown number of] municipal governments; some provide visual mapping capabilities and clickable links to other sources of information7 NPAS messages should be retrievable for review8 Guardians or carers who do not live with the people they care for should be able to subscribe to alerts that might the latter9 NPAS system should support non-Roman characters to communicate in multiple languages

Name	Municipality	Int. #	Comments	Recommendations
			<p>the source of public confusion that can be life threatening.”</p> <p>“the public survey after the May 2025 public alert test did not appear to work or was not working at certain points in time. Further, it may be better received by the public if the survey was hosted on a government website.”</p>	<ul style="list-style-type: none">¹⁰ Fund creation of multi-lingual public alert templates¹¹ Establish 24/7 language translation and interpretation service to support reliable emergency information sharing¹² In short term, determine if NPAS messages can be displayed in language chosen by individual on their device¹³ Address gaps in serving people with disabilities in receiving wireless public alerts¹⁴ Implement a national internet-based application used across Canada to serve people better with added capabilities



Name	Municipality	Int. #	Comments	Recommendations
				<p>¹⁵ Retain NPAS testing system & use for education</p> <p>¹⁶ (a) Determine whether LMDs are connected to NPAS</p> <p>(b) Determine that public alerts were broadcast</p> <p>(c) Evaluate alerts' content</p> <p>(d) solicit public feedback regularly</p> <p>¹⁷ Permit local governments and First Nations to distribute public alerts, using national guidelines, criteria and formal training</p>

Appendix 2 Intervention 68

Thank you for the opportunity to provide comments on how to improve the NPAS. The following is feedback from the perspective of a group of public alert issuers in a local municipal government context. Additional information is provided by category below.

>Key points:

- Enable the NPAS system to support characters from other languages so that public alert issuers can comply with language policies and communicate in multiple non-English and non-French languages that are prominent in their communities.
- Support and fund the creation of multi-lingual public alert templates.
- Stand up a 24/7 language translation and interpretation service to support reliable emergency information sharing.
- Explore capability for NPAS messages to be displayed in the language of an individual's device, as an interim solution.
- Report back to public alert issuers on the current experiences of people with disabilities in receiving wireless public alerts, especially existing gaps, so that they can be addressed.
- Implement a national internet-based application used across the country that can introduce added capabilities that serve the public better.
- Keep the NPAS testing schedule as-is and use the opportunities for regular public education.
- Establish processes for evaluating LMD compliance and for soliciting public feedback regularly. The absence of evaluation is risky.
- Allow access to local governments and First Nations to distribute public alerts, using national guidelines, criteria and formal training.

> Availability of alerts in Indigenous and other languages

Currently, NPAS does not support characters from other languages prominently spoken by many people in Canada. For this reason, public alert issuers are unable to communicate in these languages using NPAS. At a basic level, public alert issuers are not able to include simple template messaging in-language, such as “Translations available” or “Visit [website] for more information” as this is not supported. This creates a two-tiered system where community members who have low or no English/French proficiency must receive or seek information through alternative and

likely less effective channels of communications instead of directly as English/French speakers would receive life safety information.

In addition, where policies exist, there is a tension between existing language access policies in government, which require public alert issuers to disseminate emergency information in pre-identified languages and not being able to through NPAS due to the character incompatibility. This results in policy non-compliance.

While multi-lingual public alerts would improve and increase the reach of life saving information, there is also currently no existing overarching investment in multi-lingual translation of public alerts. Currently, public alert issuers are translating ad hoc and with minimal to no budget. Government organizations and agencies are collaborating and sharing resources, however the inevitable outcome is that there will be inconsistencies across jurisdictions in terms of whether translated information is provided/available or, even more basic, whether the translated terms being used align. Similarly to English and French speakers, non-English and non-French speakers should expect reliable information that uses understandable and consistent terminology. A suite of translated public alert templates would greatly improve the ability for public alert issuers to provide lifesaving information quickly.

Related to the above, there are significant challenges in accessing just-in-time translation. A central 24/7 service that facilitates this would enhance the turnaround time of complex emergency communications, including public alert issuance. Alternatively, exploring whether NPAS messages can be displayed in the language of an individual's device would provide an interim solution, although inferior due to the possible errors involved in machine translation.

> Accessibility of the NPAS

The commentors for this submission do not have lived experience with disability and can only provide second-hand information relayed through community engagement. Notably, feedback from persons with disabilities have indicated that both sound volume and sound type may need to be modulated for different types of disabilities. Some pitches may be more easily distinguished or heard than others for people hard of hearing, while neurodivergent people may be particularly sensitive to loud, abrasive sounds. The goal of alerting is to notify and trigger an appropriate, safety-promoting action. Overly aggressive sounds may have unintended or opposite effects on some members of the disabled community with sensory issues.

Based on feedback, it is clear that more consultation with persons with disabilities is needed and is an essential undertaking. Ultimately, public alert issuers seek clarity on how well the NPAS currently serves persons with disabilities and how to make adjustments to public alerting practices. Of interest:

- Do broadcast intrusive alerts trigger a flashing light when a user has selected this notification type in their settings for text messages? If there is a specific functionality that needs to be manually selected by a device user, how would that user be made aware and know to set up this functionality?
- Are broadcast intrusive alerts compatible with screen readers and are they compatible with voice commands a user may use to repeat the message or find more information? How is the message announced and is it clear that the message is a broadcast intrusive alert?
- Can the alert sound be modulated (volume up or down) based on assistive technology being used by the user, such as bluetooth connection through hearing aids?

> Technology gaps in wireless public alerting availability in Canada

As identified, there are opportunities to increase the reach of public alerts, especially for people who are missed using current broadcast intrusive channels (LTE, radio, television, etc.). Municipal governments are using internet-based applications, such as Alertable, to meet gaps in alerting. In addition to giving people more opportunities to be reached by public alerts, some applications include machine translation capabilities that match the language of an owner's device and allow people to review/view notifications again if they missed the original message – a challenge for NPAS alerts which can be hard to find after initial delivery for some users.

Applications also provide visual mapping capabilities and clickable links to sources of additional information, such as webpages, ultimately providing a more well-rounded and comprehensive suite of information for the public to understand an emergency.

Lastly, an application supports people who are guardians or carers for others who live in other locations and allows them to receive public alerts for locations that are important for them, even when they are outside of the alert zone. For example, a person who lives in another jurisdiction than their elderly parent can subscribe or view alerts that impact their loved one.

A national app would clarify the current confusion and frustration felt by the public who are required to download or subscribe to various public alert systems offered by different levels of government. Due to uneven access to NPAS across the country, government public alert issuers are required to purchase their own public alerting solution and are choosing different systems. The result is a disjointed emergency information environment with people not understanding the utility of different (often opt-in) systems and, when a public alert is issued, not understanding the source of a public alert.

Simultaneously, CRTC should explore the capability of delivering broadcast intrusive alerts to more types of devices, such as over 3G networks. From a socio-economic perspective, the general public should expect to be alerted of an emergency even if they do not possess an LTE or 5G capable device. A similar argument can be made for those who are not connected to a LTE or 5G network for other reasons, such as unavailable infrastructure or because someone is visiting from other countries with an incompatible device.

> Schedule for visible public test alerts

The current schedule of testing public alerts twice a year is sufficient and are two natural points in the year where public alert issuers can do public education on public alerting. In addition, it would be beneficial to have public education shared from multiple levels of government which would address questions and common misunderstandings from the public. For example, the public may misunderstand why Amber Alerts are sent to broad geographic areas and will perceive them as wasteful or as over alerting. This has consequences on the overall perception of public alerts and may decrease subscriptions or inhibit attempts by local governments to promote opt-in systems. Beyond educating about types of alerts and their efficacy, there is opportunity to provide additional guidance to the public about public alert systems in Canada, technology being used and what options are available to them to adjust notification settings, particularly for accessibility reasons.

The above suggestions can be enhanced by including information on what to do when an individual receives a public alert, such as actions to take, sources of information to check, etc. This would be particularly beneficial for communities in Canada that may not be aware of public alerts as a service or have had negative experiences with public alerts in the past that may benefit from future changes to NPAS generated by feedback from this CRTC call for comments.

As an additional note on soliciting public feedback, the public survey after the May 2025 public alert test did not appear to work or was not working at certain points in time. Further, it may be better received by the public if the survey was hosted on a government website.

> Actively monitoring the status of the NPAS

It is important that LMDs are evaluated on 1.) their connection to the NPAS; and 2.) that public alerts were broadcast. Public alert issuers need to have confidence that public alerts are being broadcast in an emergency and the public expects to receive notification. Without evaluation of compliance and consequences of non-compliance, the tool is not a strong tool and is vulnerable to failure. Technological issues have happened recently in the United States during wildfires and have been the source of public confusion that can be life threatening.

Once a process for confirming compliance is established, the test alerts each year can be used as regular checkpoints. Supplementary to this, the public survey following test alerts could be expanded and designed to solicit feedback on broadcasting.

Another suggestion for evaluation is reviewing public alerts themselves, including whether criteria for issuance was met by public alert issuers and the content of the alert.

> Additional comments:

Beyond the questions asked by the CRTC, please note the following additional comments.

> Varying access to NPAS across provinces and territories

Access to issue alerts via NPAS is governed differently amongst provinces and territories, with some provinces/territories distributing access to local governments and First Nations more leniently and others more restrictive. More restrictive levels of access have resulted in third party, opt-in public alert systems being used by local government and First Nations instead of the NPAS system. Third party public alert systems come with costs and administration born by local governments and First Nations, which is not only fiscally costly in its summation, but also costly in terms of the effort needed to build consistency and alignment across jurisdictions, sometimes navigating cohesion across different third-party systems.

Whereas the NPAS can accommodate public alerts for various hazards, public alert issuers at a local level should, firstly, be permitted to issue alerts to their community, and secondly, issue alerts based on a criteria of life safety risk and not by hazard type. The general public would be better served by consistent national guidelines for public alerting that local governments and First Nations can employ. Currently, the public has different expectations of when NPAS will be used depending on where they live in Canada.

To supplement the above recommendations, public alert issuers would benefit from and would likely welcome a formalized training curriculum about NPAS and public alerting, which currently does not exist. Current basic training and knowledge on public alerting is self-sought and only acquired between peers, if available.

> Perspectives on opt-out functionalities

In other countries that use IPAWS, mobile device users can opt-out of public alerts. Whether or not this functionality is being reviewed by CRTC, opt-out functionality is not advised and instead, CRTC should continue to improve on aspects that would increase the public's acceptance of NPAS, such as technological

accessibility, readability, reliability, and standardization of use across public alert issuers.

¹ *The Weather Network/Météomédia – Licence renewal and extension of the mandatory distribution of the service*, [Broadcasting Decision CRTC 2011-438](#) (Ottawa, 22 July 2011) at paragraphs 37-38.

² *Ibid.*, at paragraphs 44-47.

³ *Ibid.* at paragraph 76.

⁴ *Ibid.*, at paragraph 83.

⁵ *Ibid.*, at paragraph 85.