28 January 2026

Marc Morin   Filed online
Secretary General
CRTC
Ottawa, ON K1A 0N2

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) – Final submissions by FRPC**

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. The Forum supports a strong Canadian communications system that serves the public interest.

2   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.

3   The Forum submitted its comments regarding the TBNoC 2025-180 notice of consultation on 21 November 2025 ("No promises are better than empty promises: Canada Needs a 21st Century National Public Alerting System Before the 22nd Century"), and its initial reply on 19 December 2025 ("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").

4   In its final submissions 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. The CRTC must not only supervise broadcasters to ensure that they broadcast emergency alerts, but must determine whether all alerts distributed by wireless are being broadcast: while the decision as to which communications media should be used to disseminate alerts rests with the emergency management officials, the CRTC is able to and should report on the times when the broadcasting and wireless communications systems do not distribute the same

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warnings, to the same communities, at the same times. Without such reports, how will anyone know?

5	At the same time, the Forum recognizes that the CRTC is at least to some extent, caught between the rocks of legitimate concerns about the emergency alerts system, and the hard place of diffuse legal responsibility for Canada's approach to emergencies. Nothing prevents the CRTC from reporting the times each year when Canada's wireless and broadcast systems do not carry the same alerts – so that decision-makers responsible for these alerts are held to account. Failing to make such reports, when nothing prevents the reports from being made, betrays the trust that Parliament has placed in the CRTC to implement its *Broadcasting Policy for Canada* and its *Telecommunications Policy for Canada*.

6	The Forum's final reply to other interveners is brief, being limited due to lack of time caused by overlapping CRTC consultations to the issues of coverage, languages and funding. The conclusions and recommendations made in our initial intervention and reply have not changed.

Gaps in coverage

7	Rogers has argued that the main concern that should be addressed is the matter of gaps in coverage. It says the solution is to increase funding to ensure complete wireless coverage. Yet FRPC's previous research identified times when emergency alerts were distributed by mobile, but were not broadcast.

8	Therefore, while the Forum agrees that broadband coverage should be ubiquitous, ubiquitous broadband coverage is, without CRTC intervention, likely to continue to deprive people who cannot afford or do not want a mobile phone of needed emergency alerts to protect lives and/or property. The CRTC's emergency alerts policy therefore cannot rest solely on an as-yet unachieved goal of complete broadband coverage: it must ensure that all other communications systems (radio, television and BDUs) also distribute these alerts. This is especially true in the case of radio because of all the communications media available, it is the only one that can be accessed free of charge by radio sets, by battery-operated radio sets, by radio sets in automobiles and by mobile telephones.

9	FRPC agrees with Rogers' position that the Commission lacks jurisdiction over emergency management officials (paragraph 4). Yet the CRTC could and in our view should publish annual reports (other than its maps) showing which communities cannot obtain the radio signals of the CBC/R-C, to bring this matter to the attention of those responsible for funding the public broadcaster. As the Ministers to whom the CRTC reports noted in February 2023,

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> [a]ctive market monitoring and international benchmarking can help Canadians understand the context for regulation and so better equip them to participate in its formation.[1]

10   FRPC also agrees with other interveners that Pelmorex and its partners should "publish transparent audits of infrastructure reliability, including power and fuel redundancy for aggregator nodes." This is because a "system that cannot survive its own outage cannot guarantee public safety."[2]

Languages other than spoken or written English and French

11   The Forum also supports in principle the proposal by the Association canadienne-française de l'Alberta that the Commission require Pelmorex to provide English- and French-language translations of emergency alert messages, and translations from English and French into Indigenous and signing languages (ACFA, page 2).

12   Broadcasters that argue that technology limits the distribution of alerts to Canada's official languages are contradicted by the evidence offered by parties such the First Mile Connectivity Consortium (paragraphs 6 to 8) as well as Indigenous communities such as those in James Bay (paragraphs 64 to 66):

> 64. When power failed and national systems delivered no alerts into the community, accessibility became a local responsibility. In Mistissini, JBCCS and CINI-FM translated each Emergency Operations Centre update into two concise scripts—one in Cree and one in English—voiced by broadcasters familiar to local listeners and mirrored on livestream. In contrast to the confusion that spread across social media, structured broadcasting provided clarity and calm. Messages were repeated throughout the day, recognizing that in a crisis, comprehension depends as much on repetition and reassurance as on technology.
>
> 65. For Jules Quachegan in Chisasibi, translation itself was a form of emergency service: his EOC briefings arrived in English, but residents needed Cree. He translated on the spot, drafted concise bilingual scripts, and cycled through "translate, record, post, go live again," ensuring Elders, unilingual speakers, and residents with hearing or vision limitations received the same information as others.
>
> 66. In Wemindji, Edward Georgekish faced similar demands under even tighter constraints. With a small staff and frequent technical failures, he kept the local station on air throughout the fire season, broadcasting in Cree and English to listeners across the region. Local officials came directly to the studio to announce evacuation details or public-safety messages.

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[1]   Canadian Heritage, *New CRTC Chair's Leadership Will Help Shape the Futureof Canada's Communication System*, News Release (Gatineau, 6 February 2023).

[2]   James Bay Cree Communications Society (JBCCS) (Revised), Intervention, (Mistissini, 28 November 2025), at paragraph 31.

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Georgekish described radio as "the key" to community safety—trusted, immediate, and understood. His broadcasts also reached Cree families far beyond the coast, connecting patients in Montreal and family in Saskatoon who relied on familiar voices to know what was happening at home. For him, accessibility meant continuity: having the power, the people, and resources to keep when every other system went silent.[3]

13   The James Bay Cree Communications Society noted that a text-to-speech system was already being developed in fall 2025 "for Eeyou Istchee, with successful model tests completed and full Southern and Northern East Cree dialect datasets now in production".[4] The Society noted that Indigenous-language text-to-speech "poses no barriers to NAAD/EAS integration", as "[s]tandard WAV/MP3 audio files can be generated in seconds and ingested by existing encoder-decoder units without modification."[5] It pointed out that what is limiting linguistic equity in emergency alerting "is not technology but the absence of a mandate, interface and funding to integrate Indigenous-language audio into the national workflow."[6]

14   FRPC therefore disagrees with Rogers (paragraph 4) that "[t]o ensure a practical and inclusive approach, this matter should be examined collaboratively by the Pelmorex Governance Council and the ATWG". While collaborative approaches are often necessary, such as when the Commission seeks to improve its data-collection practices, actual changes rather than collaborative studies and further research are needed now, to save lives and to limit major financial losses related to property damage. What is known now is that despite the continual changes in technology described by JBCCS very few changes have been made to the National Alert Aggregation and Dissemination System that would ensure that emergency alert messages are delivered in their entirety rather than being abbreviated,[7] that emergency alerts are fully accessible and that the emergency alert messages are delivered in languages other than English or French.

15   As the CRTC lacks any legal authority over the Pelmorex Governance Council, the Commission should issues orders to fund test-to-speech solutions to disseminate alerts in spoken languages other than English and French. The Forum sets out tentative scenarios for the CRTC to use its existing authority under the current *Act* to proceed.

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[3]   JBCCS (Revised), Intervention, (Mistissini, 28 November 2025).
[4]   *Ibid*., at paragraph 67; see also paragraph 69.
[5]   *Ibid*., at paragraph 74.
[6]   *Ibid*., at paragraph 78.
[7]   Marc Nonni, Intervention, paragraph 8.

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Funding adaptation to 21st century requirements

16   Adapting Canada's broadcast emergency alerting system to the 21st century needs and requirements of its people will require funding.

17   No single participant in the system can or should fund the changes required to ensure that the system is resilient, available free of charge, accessible to those who are Deaf or Blind, and available from coast to coast to coast.

18   Pelmorex, while it can and should ensure that the alerts it broadcasts are made in both official languages and in other languages – in their entirety – should not, without clearer evidence than is now on the public record, be expected to fund changes for which the responsibility lies with other jurisdictions (provincial or territorial emergency alerting officials, for instance). For one thing, the structure of the NPAS appears to be carefully separated from the operation of the Pelmorex licences for the Weather Channel/Météo Média. (In FRPC's view, this structural complexity suffices to explain why the federal government rather than a private company should be required to design, operate and maintain the National Alert Aggregation and Dissemination and the National Public Alerting Systems.)

19   The current *Broadcasting Act* – that may or may not change, depending on the *CUSMA* negotiations now under way – empowers the CRTC to issue orders to broadcasting undertakings to implement the *Broadcasting Policy for Canada*. Section 9.1(1)(k) permits the Commission to make orders imposing conditions of service on the Pelmorex undertaking so as to remove barriers to the access by persons with disabilities to programming – which presumably includes programming consisting of emergency alerts – by providing alerts signed and provided in their entirety in English and in French:

> 9.1 (1) The Commission may, in furtherance of its objects, <u>make orders imposing conditions on the carrying on of broadcasting undertakings</u> that the Commission considers appropriate for the implementation of the broadcasting policy set out in subsection 3(1), including conditions respecting
> …
> (k) access by persons with disabilities to programming, including the identification, prevention and removal of barriers to such access;
> (l) the carriage of emergency messages;

20   Section 9(1)(1)(o) also empowers the CRTC to obtain any information required about the operation, costs or profits of Pelmorex regarding the National Alert Aggregation and Dissemination and National Public Alerting Systems:

> …

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(o) the provision to the Commission, by persons carrying on broadcasting undertakings, of any other information that the Commission considers necessary for the administration of this Act, including

(i) financial or commercial information,

…

(iii) information related to expenditures made under section 11.1,

….

21   Finally, section 11.1 of the current *Act* enable the CRTC to require all those carrying on broadcasting undertakings or all those of a class of broadcasting undertaking such as BDUs (11.1(4)) " to finance Canadian audio or audiovisual programming" such as emergency alerts (11.1(1)(a)) and to support *other* broadcasters undertakings (11.1(5)) that offer exceptionally important programming services such as emergency alerts (section 11.1(1)(b.1)), as well as the tools (11.1(1)(d)) needed to implement the *Broadcasting Policy for Canada* and its objective of ensuring that the public is exposed to views (including differing views) on matters of public concern including emergency alerts (3(1)(i)(iv)):

> 11.1 (1) The Commission may make regulations respecting expenditures to be made by persons carrying on broadcasting undertakings for the purposes of
> (a) developing, financing, producing … Canadian audio or audio-visual programs, … for broadcasting by broadcasting undertakings;
> …
> (b.1) supporting broadcasting undertakings offering programming services that, in the Commission's opinion, are of exceptional importance to the achievement of the objectives of the broadcasting policy set out in subsection 3(1);
> …
> (d) supporting the development of initiatives — including tools — that, in the Commission's opinion, are efficient and necessary for the achievement of the objectives of the broadcasting policy set out in subsection 3(1).
> …
> Order — particular broadcasting undertaking
> 11.1(2) The Commission may make an order respecting expenditures to be made by a particular person carrying on a broadcasting undertaking for any of the purposes set out in paragraphs (1)(a) to (d).
> …
> Application of regulations
> (4) A regulation made under this section may be made applicable to all persons carrying on broadcasting undertakings or to all persons carrying on broadcasting undertakings of any class established by the Commission in the regulation.
> Recipients

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(5) Regulations and orders made under this section may provide that an expenditure is to be paid to any person or organization, other than the Commission, or into any fund, other than a fund administered by the Commission.

The Forum looks forward to the opportunity to review other parties' final submissions in this proceeding.

Sincerely yours,

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