

July 2, 2015

John Traversy
Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Québec J8X 4B1

Re: CWTA comments on the Part 1 Application by Bruce Power requesting the CRTC order respondent wireless service providers to implement wireless public alerting forthwith

1. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents wireless service providers as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators and business-to-business service providers. CWTA is pleased to comment on Bruce Power's application to immediately implement mobile public alerting in Canada.
2. Of all the social and economic benefits enabled by Canada's world-leading wireless networks, public safety and the security of Canadians is the most important. The ubiquity and functionality of wireless devices make them an irreplaceable public safety tool for consumers and first responders. This fact presents a responsibility that CWTA and the entire wireless industry take very seriously.
3. The wireless industry is fully committed to enabling and facilitating any services that can leverage the capabilities of the wireless network to help keep Canadians safe. A collaborative process involving the wireless industry, alerting authorities and other interested stakeholders, and under the purview of the Commission, is currently underway to implement a national wireless public alerting service (WPAS). And the WPAS messages will be distributed over the most current network technology used by wireless service providers for the benefit of all Canadians.
4. In light of the above, CWTA respectfully submits that the Commission deny the application. We are pleased to provide more detail below.

The wireless industry is committed to enabling mobile services that can help keep Canadians safe

5. The wireless industry takes the health and safety of all Canadians very seriously. Wireless devices have transformed society in the most beneficial ways, the most important of which are the ways it has helped improve the safety of Canadians. The availability and mobility of wireless service alone have greatly increased

access to emergency services, which is evidenced by the fact that approximately 70% of 9-1-1 emergency calls are made from wireless devices.¹

6. Wireless services are also used to improve the deployment and coordination of first responders, provide Canadians with critical information and enable access to new emergency services. The wireless industry has therefore consistently and proactively enabled and promoted the use of wireless technology to enhance the safety of Canadians. Such efforts have included:
 - Launching and administering the Wireless AMBER Alerts program to assist law enforcement agencies in providing the public with immediate and up-to-date information about a child's abduction, and to solicit the public's help in the safe and swift return of the child (Wirelessamber.ca);
 - Undertaking all required technical upgrades to enable Text with 9-1-1 service for Canada's deaf, deafened, hard of hearing or speech impaired community and managing all communications efforts for the service through the Textwith911.ca web site; and
 - Providing ongoing support to the Canadian Centre for Child Protection to further their efforts with Missingkids.ca and TextEd.ca.
7. Indeed, every time there has been an opportunity to enhance public safety using wireless technology, the industry has responded, including the opportunity to provide wireless public alerting nationally.

An open and collaborative process to implement national mobile public alerting is currently underway

8. The wireless industry recognizes that the reach and use of wireless devices make them the ideal platform to disseminate emergency alert messages affecting life and property to Canadians. That is why all service providers have been actively participating in the CRTC Interconnection Steering Committee (CISC)'s Network Working Group dedicated to developing the standards needed to test and implement a national wireless public alerting system based on the latest and most effective mobile technologies.
9. As the Commission noted in its news release of June 2, 2015 "The working group is an open forum that fosters collaboration among wireless service providers, federal, provincial and territorial alerting authorities, representatives from the national public alerting system and wireless equipment providers."² The working group has developed the specifications necessary to deliver emergency alert messages, which will be tested in the coming months and subject to a public pilot project in 2016.
10. The wireless industry appreciates the Commission's support, both during the CISC process and in its new release, regarding its progress on WPAS. The industry is also well aware of the Commission's intention to ensure a timely rollout of the system – including a possible public proceeding if needed in 2016-17 as outlined in the *CRTC Three-Year Plan 2015-2018*. The wireless industry respects the Commission's timelines and is also

¹ CRTC: *A Report on Matters Related to Emergency 9-1-1 Services*.

² CRTC encouraged by the wireless industry's progress on mobile public alerting, <http://news.gc.ca/web/article-en.do?nid=982919>.

driven by the goal of enhancing the safety of Canadians as soon as possible while maintaining a high quality of service for subscribers.

The WPAS system is being designed to leverage the most current network technology for the benefit of all Canadians

11. The CISC WPAS work concluded to date has examined a proposed cell broadcast system with alert messages delivered over Long-term Evolution (LTE) networks, the most advanced network technology available. While LTE service remains an aspirational goal in many other countries, it is the current network technology in Canada. Canada has the second most LTE networks in the world and according to the Commission’s research more than 80% of Canadians had access to LTE service at the end of 2013.³ Current LTE coverage is that much more extensive.
12. Indeed, virtually all devices sold in Canada today are LTE enabled. Canadians do not have to pay higher fees to wireless service providers to “access” an LTE network. Rather, Canadian consumers will be using LTE networks as they replace their previous devices, which is happening at a rapid pace.
13. Cell broadcast public alerts can also be implemented on other GSM-based networks, such as HSPA. However, the wireless industry is committed to implementing WPAS on the leading-edge network technology that Canada is a world leader in deploying. As such, the system will be sustainable and more capable of incorporating new technological advances in the future.

Conclusion

14. The wireless industry has always embraced its responsibility to enable and facilitate any applications that can benefit the health and safety of Canadians by leveraging the reach and use of the wireless network and wireless devices. Indeed, of all the social and economic benefits enabled by Canada’s world-leading wireless networks, public safety and the security of Canadians is the most important. As such:
 - The wireless industry is committed to enabling mobile services that can help keep Canadians safe;
 - An open and collaborative process to implement national mobile public alerting is currently underway;
 - The mobile alerting system being designed will leverage the most current network technology for the benefit of all Canadians.
15. For the above reasons, CWTA respectfully submits that the Commission deny Bruce Power’s Part 1 Application related to implementing mobile public alerting. We appreciate the opportunity to participate in this process.

³ CRTC: *Communications Monitoring Report 2014: Telecommunications Sector*.

Yours truly,

A handwritten signature in blue ink, appearing to be 'K Eby', with a long horizontal flourish extending to the right.

Kurt Eby
Director, Regulatory Affairs and Government Relations

cc.:

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