

February 7, 2019

Filed electronically

Mr. Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa Ontario K1A 0N2

Subject: Comments regarding Part 1 Application requesting that the Commission amend Telecom Regulatory Policy CRTC 2017-91 to allow for the establishment of a harmonized emergency alerting Public Awareness Test Schedule for the National Public Alerting System

Dear Mr. Doucet:

Introduction

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.
2. CWTA and its wireless service provider (WSP) members¹ support the Part 1 Application as filed by Senior Officials Responsible for Emergency Management (SOREM). The Application seeks to harmonize the number of visible public tests issued by the Alert Ready system across all distributors by increasing the number of wireless public alerting (WPA) visible public tests from one to two per year, and decreasing the number of visible public tests issued by radio, TV broadcast and BDU to two (from the current 5).
3. CWTA is pleased to provide these additional comments on behalf of its WSP members.

Two visible public tests per year

4. Testing and evaluating systems and processes across the entire system helps to ensure that in times of an emergency or disaster, distributors are prepared to deliver urgent and lifesaving warnings to the public. Canadians should feel confident that the system is working as designed.

¹ Bell, Eastlink, Freedom Mobile, Rogers, SaskTel, Tbaytel, Videotron

5. CWTA notes that WSPs have at their disposal “invisible” WPA test capabilities which are used on an ad-hoc basis for WSP system testing; this testing generally occurs without the public being aware. The visible public tests, on the other hand, are intended for consumer awareness and alert originator exercises.
6. It is the view of CWTA and its WSP members that a maximum of two visible public tests per year is sufficient to meet the goals of testing, and to minimize any unintended consequences related to over-testing. Due to the size of the handset population and scope of the geographic areas that will receive the visible public tests, any quantity over the proposed two per year is excessive and will lead to “Alert Fatigue”.

Requirement for all jurisdictions to participate where appropriate

7. It is also our view that visible public tests are beneficial only when each federal, provincial and territorial jurisdiction participates. However, there should be a provision in the Commission determination to permit, in advance, the cancellation of a visible public test alert on a regional basis in the event that a recent real-life event occurred such as a wild fire, flood, or tsunami. In these instances, the public test of the system would be redundant, and could leave recipients traumatized.

Benefits of harmonizing visible public tests

8. CWTA and its WSP members believe that harmonizing the wireless, TV, Radio, and BDU tests will avoid public confusion and will create synergies for public awareness. In fact, harmonizing the visible public tests and concentrating awareness efforts around the system as a whole will ensure the public regards the National Public Alert System (NPAS) as a single entity with multiple message technology mediums, as is the intent of the system. It would build public confidence in the integrated system and in the national and provincial alerting initiatives, which must be trusted during an emergency.
9. Harmonization also allows the various federal, provincial and territorial (FPT) emergency management partners to leverage their respective activities, including awareness initiatives directed at residents in their jurisdictions. Having a unified visible public test schedule facilitates a more defined message that focuses on the intent of testing rather than the exclusions.

Scheduling of secondary visible public test

10. Ensuring that the visible public test schedule timing is identified well in advance, and that the timing of these tests remains consistent, will be important for all alerting partners. WSPs will require predictability in the scheduling to facilitate numerous operational activities including the preparation and dissemination of any customer notifications and internal resources, such as call centre staff education, and staffing.

11. Determining the specific timing of both visible public tests should be done collaboratively with all alerting partners, including WSPs, and should take in to consideration identified requirements and concerns.

WPA public awareness and education

12. Educating consumers concerning upcoming visible public tests will continue to be an important activity, and one best shared amongst all partners. The collaborative approach used in for the November 2018 visible public test facilitated the development of common messaging which allowed all partners to speak with a common voice, but also allowed each to tailor messaging to the needs of their respective audiences.
13. Mandating specific awareness activities should be discouraged. Allowing each partner to determine which mechanisms to use to communicate with their audiences ensures that the most effective means are used, and that the approach can evolve over time.

Other - SOREM Response (filed on February 4th) to CRTC's RFI (Part 1 Application Requesting that the Commission Amend Telecom Regulatory Policy CRTC 2017-91 – Request for Information from SOREM)

14. Within its response, SOREM identified two new reporting requirements that it believes should be imposed on WSPs. They involve notification of the NAAD System Governance Council and subscribers in the event that visible public test are not successfully distributed.
15. CWTA and its members strongly believe that neither requirement should be mandated because they are either unnecessary or impossible to undertake, and go unnecessarily beyond the determinations in Telecom Regulatory Policy CRTC 2017-91 and Telecom Decision 2018-108.
16. WSPs have already implemented the practice of sharing information with the Governance Council and have done so with both visible public tests, to the degree that is possible:
 - for the May 2018 visible public test, WSPs participated in live conference calls with Pelmorex during the tests and this information was shared with the Governance Council; and
 - for the November 2018 visible public test, all alerting partners participated in live conference calls with Pelmorex and WSPs, to share information in real-time as the alerts were distributed.
17. Live conference calls during visible public tests are the most expeditious way to share information. WSPs fully support this best practice.
18. On the subject of sharing failed live test information with mobile subscribers, CWTA notes that cell broadcast technology does not capture specific subscriber information. Cell broadcast is one-way communication that does not have the ability to identify how many mobile subscribers might be in an area, or who the individual subscribers are. Given this, it is

impossible for a WSP to know how many subscribers are impacted by an identified failure, or to identify specific subscribers that should be notified. Further, to provide a network and province wide notification would cause confusion, and undermine the effectiveness of successful visible public tests.

19. If a network outage occurs, the top priority for all WSPs is to resolve the issue expeditiously. As an industry, we fully understand the importance of providing these services to Canadians.

Conclusion

20. CWTA and its WSP members fully support the SOREM proposal to harmonize visible public tests across all channels, including wireless.
21. Building a reliable public alerting system in Canada is a responsibility we all share. All levels of government and industry partners must work collaboratively to ensure public alerting serves its intended purpose as a public safety tool.
22. CWTA appreciates the opportunity to comment on this application.

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