

November 21, 2025

Mr. Marc Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
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Gatineau, QC  
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By: Intervention Comment Form

**Subject: Telecom and Broadcasting Notice of Consultation CRTC 2025-180, Call for comments – Improving the public alerting system**

1. The Canadian Telecommunications Association (“CTA”) is an industry association dedicated to building a better future for Canadians through connectivity. Our members include service providers, equipment manufacturers, and other organizations in the telecommunications ecosystem, that invest in, build, maintain and operate Canada’s world-class telecommunications and broadcasting networks.
2. Through our advocacy initiatives, research, and events, we work to promote the importance of telecommunications to Canada’s economic growth and social development, and advocate for policies that foster investment, innovation, and positive outcomes for Canadians who rely on telecommunications and related services.
3. Canadians’ ability to receive life saving services, including those provided via the public alerting systems, are made possible by the work done by wireless service providers (“WSPs”) in providing the necessary infrastructure and support.
4. CTA comments are being submitted on behalf of our Members and will be limited to the **wireless public alerting system and their role as wireless service providers**. It should be noted that absence of a response to any other elements identified in the Consultation should not be interpreted as agreement or disagreement with such proposals. To the extent that there is any inconsistency between our submission and that of an Association Member in this consultation, the submission of such member shall prevail with respect to its position on the relevant matter.

## **Distribution of alerts in both official languages**

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

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

### **Q1 CTA Response:**

5. No additional regulatory measures are required as WSPs will relay alerts exactly as they are provided by the alert issuer. For clarity, where alerts are provided in English-only, French-only or bilingually (English & French included in one message), WSPs relay the alert in the same manner.
6. Participation in NPAS, including the relaying of alerts, is already a condition of service as identified in ***Telecom Regulatory Policy CRTC 2017-91, Implementation of the National Public Alerting System by wireless service providers to protect Canadians.***<sup>1</sup>

## **Availability of alerts in Indigenous and other languages**

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

*Specifically:*

- a. Have EMOs considered whether, and how, to distribute public alerts in languages other than English and French using the NPAS? If not, why not – what challenges were identified to doing so?*
- b. What is the feasibility, both technically and operationally, of the NPAS supporting additional languages? What technical barriers exist to supporting additional languages (e.g., language-specific character sets for alerting decoder devices,*

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<sup>1</sup> Paragraph 13: Accordingly, the Commission determines that, as a condition of service under sections 24 and 24.1 of the Act, all Canadian WSPs (i.e. both carriers and non-carriers) are required to participate in the NPAS.

*language-specific character sets for handsets, technical limitations of the NAAD System, Wireless Public Alerting [WPA] technical specifications, etc.)?*

**Q2 CTA Response:**

13. CTA retains the right to provide additional feedback in relation to this question during subsequent phases of this proceeding.
14. At present, CTA is not aware of any technical issues concerning the support of additional languages. However, it will be necessary to understand what additional languages are being contemplated to ensure that the appropriate character sets and/or standards are available for both Broadcast Message Centre (“BMCs”) and devices<sup>2</sup>, and that both are appropriately tested.
15. In addition, a fuller discussion will be necessary within other bodies (i.e., Senior Officials Responsible for Emergency Management Federal/Provincial/Territorial Public Alerting Working Group (SOREM), and the Pelmorex Governance Council, etc.) to better understand the operational impacts related to a broadened suite of languages. For example, if multiple languages are to be relayed within a geographical area does a single alert contain this information or are multiple alerts sent. It is important that the impact on the end-user be factored into any decisions being made.

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

**Q3 CTA Response:**

16. CTA retains the right to provide additional feedback in relation to this question during subsequent phases of this proceeding.

***Accessibility of the NPAS***

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

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<sup>2</sup> This refers only to devices that are certified by WSPs.

**Q4 CTA Response:**

17. CTA retains the right to provide additional feedback in relation to this question during subsequent phases of this proceeding.

**Technology gaps in wireless public alerting availability in Canada**

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

- a. Where are the current gaps in accessing WPA in rural, remote, and Indigenous communities in Canada and how can such gaps be efficiently tracked?*
- b. What is the feasibility, technically or otherwise, of creating and operating a national mobile application available for download across Canada, as a possible solution for reducing gaps in WPA?*
- c. Should WSPs be required to provide alerting over 3G networks? What technical or economic challenges exist to doing so?*
- d. How can the Commission improve the current reach of WPA to rural, remote, and Indigenous communities in Canada through regulatory measures? What other means should the Commission consider to support the distribution of public alerts to Canadians that are not currently served by WPA?*

**Q5a CTA Response:**

18. The Commission collects and makes publicly available information concerning wireless coverage.<sup>3</sup> This information is already available.

**Q5b CTA Response:**

19. CTA retains the right to provide additional feedback in relation to this question during subsequent phases of this proceeding.

20. The development of a national Alert Ready app has been raised within the Pelmorex Governance Council however no decision has been made as to whether it should proceed.

21. CTA is aware of several apps that have been developed at a provincial basis by provincial emergency management offices.<sup>4</sup>

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<sup>3</sup> <https://crtc.gc.ca/eng/publications/reports/PolicyMonitoring/mob.htm> and <https://crtc.gc.ca/eng/television/services/geo.htm>

<sup>4</sup> This includes Alberta, Saskatchewan, Nova Scotia and Northwest Territories.

**Q5c CTA Response:**

22. WSPs should not be required to provide alerting over 3G networks. As the Commission is aware<sup>5</sup>, 3G networks are actively being decommissioned. This is not a Canada-specific phenomenon with WSPs in other countries also doing the same.
23. CTA has also communicated this via its website: *“Canada’s mobile wireless carriers continually invest in enhancing their networks and deploying the latest technologies. In some cases, this requires the shutdown of older services, like 3G, so that spectrum and infrastructure used to provide the older services can be re-purposed for the provision and enhancement of more advanced technologies, like 4G LTE and 5G.”*<sup>6</sup>
24. Given that some carriers have decommissioned, and others are in the process of decommissioning, the resources in question have already been diverted or redeployed. It would be unreasonable to expect that this work would now be undone.
25. It is also important to remember that the discussion concerning the use of 3G networks formed part of discussion leading to **Telecom Regulatory Policy CRTC 2017-91, Implementation of the National Public Alerting System by wireless service providers to protect Canadians**. At paragraph 13:

*“All WSPs that submitted interventions in the proceeding stated that implementing WPA on their pre-long-term-evolution (LTE) networks would add considerable time and cost. WIND Mobile Corp., now known as Freedom Mobile Inc. (Freedom Mobile), referred to its third-generation (3G) / evolved high-speed packet access (HSPA+) network as “legacy,” while Rogers Communications Canada Inc. (RCCI) indicated that its second-generation (2G) and 3G networks are nearing the end of their operational lives.”*

26. Further at paragraphs 18 and 20:

*“The Commission stated in Telecom Regulatory Policy 2016-496 that “the latest generally deployed mobile wireless technology [LTE technology] should be available in Canada not only in premises, but on as many major transportation roads as possible” and announced a fund to help support the continued rollout of these technologies in underserved areas. The Commission is of the view that exempting pre-LTE networks from WPA requirements will have minimal impact on the coverage of emergency alerting. Conversely, requiring WPA on pre-LTE networks*

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<sup>5</sup> <https://crtc.gc.ca/eng/phone/mobile/3g.htm>

<sup>6</sup> [https://canadatelecoms.ca/consumer\\_resource/faq-3g-hspa-network-discontinuation-in-canada/](https://canadatelecoms.ca/consumer_resource/faq-3g-hspa-network-discontinuation-in-canada/)

*would increase deployment costs and delay the deployment of emergency alerts over wireless networks.”*

*“In light of the above, the Commission will not require the implementation of WPA on pre-LTE networks or mobile satellite services.”*

**Q5d CTA Response:**

27. The Commission has already undertaken steps via its consultation processes and the development of funding models to help alleviate gaps in WPA by extending the build of cellular networks.

28. For example, ***Telecom Regulatory Policy CRTC 2024-328, Broadband Fund policy review – New policy for funding capital projects*** notes at paragraph 5, 6 and 76:

*“In March 2023, the Commission launched a public consultation to review the policy governing the Broadband Fund. The intent of the consultation was to explore how to improve the Broadband Fund and its processes, including making the application and evaluation processes faster and easier. In addition, the consultation presented an opportunity for the Commission to increase its focus on the role it must play in helping to advance reconciliation with Indigenous peoples. The Commission received comments from 44 organizations and 31 individuals (hereafter, the parties).”*

*“The Broadband Fund policy review, based on the public consultation, has three objectives:*

- improving the speed and efficiency of the funding process;*
- helping to advance reconciliation with Indigenous peoples; and*
- increasing Canadians’ access to high-speed Internet and cellphone services.”*

*“This policy replaces the original Broadband Fund policy issued in Telecom Regulatory Policy 2018-377. With this new Broadband Fund policy for capital projects, the Commission is (i) making its funding process faster and more efficient, (ii) helping to advance reconciliation with Indigenous peoples, and (iii) increasing Canadians’ access to high-speed Internet and cellphone services.”*

29. It is also important to remember that public alerting is a set of complementary services, each providing a mechanism for the delivery of information. In instances

where wireless public alerting may not be fully supported, Canadians can access the information via TV or radio, or any number of apps that are already available.

### **Schedule for visible public test alerts**

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

- a. *Is the biannual visible public alert test schedule still appropriate and in the public interest? Provide supporting rationale for why or why not and, if not, what changes are needed.*
- b. *Do EMOs, LMDs, and the NAAD System operator require further flexibility with regards to the timing and frequency of visible NPAS testing? If so, what new or modified regulatory measures are appropriate to enable that flexibility?*

### **Q6 CTA Response:**

30. CTA retains the right to provide additional feedback in relation to this question during subsequent phases of this proceeding.
31. CTA expects that the current schedule of 2 public alert tests each year remains appropriate to the needs of EMOs.
32. Since the launch of public alerting, the number of alerts issued in a given year has increased from 130 in 2019, to 841 in the first eight months of 2025.<sup>7</sup> While the majority of Canadians have had some level of direct experience with alerting, there is still value in ensuring that the whole of Canadians have, at minimum, access to one test alert in a year. The current schedule allows for that while offering flexibility to EMOs in terms of their respective participation.

### **Actively monitoring the status of the NPAS**

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

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<sup>7</sup> <https://www.alertready.ca/alert-count/#2025>

- a. *What technical or other solutions could the Commission, the NAAD System, or the telecommunications and broadcasting industries implement to automatically detect and validate LMD connection to the NPAS?*
- b. *What tools (including regulatory measures) should the Commission use to streamline the verification and monitoring of LMDs' NPAS requirements? For instance, what kinds of standardized forms or evidence should LMDs provide to the Commission to demonstrate that they have established and are maintaining a connection with the NAAD System and disseminating alerts to the public in accordance with any applicable requirements?*

**Q7. CTA Response:**

33. These mechanisms already exist for wireless public alerting. For example:

On an ongoing basis: The NAAD system and each WSPs' BMC "talk" to each other on an ongoing basis, via a "link test", so that when there is an outage it is flagged to Pelmorex. In this example, the NAAD system will ping BMCs and if there is no response back, another ping is sent. If there is no response after a predetermined time or number of failed exchanges, internal alarms are activated within the NAAD System and the WSPs BMC identifying a potential problem. This allows all parties to investigate and action resolution in real time.

During public testing: Further, as part of the public alert test protocols, in a meeting that occurs while the test is underway, each part of the chain confirms successful distribution, from EMO to the NAAD to the WSP BMC to "field". This allows all parties to understand the distribution chain and identify issues within the chain in real time.

34. In addition, WSPs provide information to the Commission via multiple mechanisms including that identified in the ***Telecom - Staff Letter addressed to All Canadian Telecommunications Service Providers, Subject: Service Outage Notification and Reporting Requirements*** where the Commission identified:

*"Today, the Commission issued Telecom Decision 2025-225 (the decision), establishing, on a final basis, major service outage notification and reporting requirements. This decision requires all Canadian telecommunications service providers (TSPs) to report major service outages to the Commission, Innovation, Science and Economic Development Canada (ISED), and other government authorities. Please refer to the decision for the complete requirements. For your*

*convenience, the requirements are summarized in Attachment 1 to this letter. Most of these requirements will take effect on 4 November 2025.”*

35. WSPs have also implemented a number of resiliency measures that further ensure the ongoing reliability of the public alerting network. Most recently, ***Telecom Decision CRTC 2025-65, CISC Emergency Services Working Group and Network Working Group – Consensus report NTRE081 on measures to improve the resiliency of 9-1-1 and public alerting services and reduce the impacts of outages*** identified within the Appendix at paragraph 2:

*“Direct all WSPs to implement an adequate combination of best practices for interconnection to the wireless public alerting environment, including the following:*

- (a) Redundancy: Deploy, at a minimum, one Broadcast Message Controller (BMC) pair and interconnect each BMC to the National Alert Aggregation and Dissemination (NAAD) System points of interconnection.*
- (b) Diversity:*
  - (i) Ensure the BMCs are geo-redundant.*
  - (ii) If technically feasible, use more than one vendor for the four links providing interconnection to the public alerting system to provide enhanced interconnection redundancy, resiliency, and diversity.*
  - (iii) Deploy two BMC pairs, each serving different regions of the country and each being able to communicate with all the cellphone towers of the WSP nationally in the event of failure.*
- (c) Testing: As per the Commission [letter](#) dated 3 October 2018, WSPs shall participate in the biannual national test days.*
- (d) Monitoring: Implement robust monitoring systems to help detect outages and other network issues early, allowing quicker response times and minimizing the impact on mobile wireless service end-users.*
- (e) Training: Ensure that WSPs’ technical staff are properly trained on the wireless public alerting system ecosystem to help minimize the impact of outages. This training can include regular training on disaster recovery procedures, communication protocols, and other relevant topics.*
- (f) Cybersecurity: Implement robust cybersecurity measures to help prevent outages caused by cyber attacks. The measures can include implementing firewalls, intrusion detection systems, and other security measures.”*

36. In addition, on an annual basis, WSPs are further required to provide to the Commission a WPA Survey whereby they must confirm numerous elements including

*“... network implementation of alert distribution capability and interoperability with the NAAD System on all LTE mobile cellular networks...” and identify “issues with the distribution of actual or test alerts”.*

## **Conclusion**

37. Many of the items identified within this proceeding already exist as it relates to wireless public alerts and the activities undertaken by WSPs. Others will require additional feedback from impacted stakeholders before fuller responses can be provided.
38. CTA appreciates being able to share its preliminary comments and looks forward to reviewing the interventions that will be filed as part of this proceeding.

Kind regards,



Ursula Grant,  
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