

January 23, 2026

Public Safety Canada
Contracting Authority: Matthew Young

Sent via E-mail Address: matthew.young@tpsgc-pwgsc.gc.ca

Dear Mr. Young,

Re: Public Safety Canada's request for feedback in relation to the **2025 National Public Alerting System Request For Information**

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 access life saving services, including receiving public alerts, 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 member WSPs, and are not inclusive of all elements contained within the *2025 National Public Alerting System Request For Information* ("RFI"). It should be noted that absence of a response to any elements identified in the RFI 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 a CTA member in this process, the submission of such member shall prevail with respect to its position on the relevant matter. Further, CTA and its members welcome other opportunities for engagement with Public Safety Canada ("PSC") as it gathers information and determines next steps for this important service.

Introduction

5. As PSC is well aware, a significant amount of time and resources have gone into the development of a public alerting system in Canada. This investment has occurred across a

broad range of stakeholders, including WSPs (one of the many types of last mile distributors (“LMDs”), alert issuers, and Pelmorex.

6. Pelmorex was granted approval in 2009, by the Canadian Radio-television and Telecommunications Commission (“CRTC”), to build *National Alert Aggregation and Dissemination System* (“NAAD”). The system was launched in 2010 and has served as the technical infrastructure for Canada’s public alerting system since then.
7. With the inclusion of broadcasters in 2014 and WSPs in 2018, alert issuers were provided with tools to help ensure Canadians had access to information at times when it mattered most to their safety.
8. This continued evolution and the inclusion of new modes of distribution have provided a broader suite of mechanisms for alert distribution and an increase in the reach of the alerting system. The system itself has seen increased use, and the number of Broadcast Immediate (“BI”) alerts that are distributed has increased exponentially over the years from 130 alerts in 2019,¹ to 911 as of December 31, 2025.²
9. As noted within the RFI, PSC is soliciting information that will “support overall work towards implementing a renewed model” for public alerting. The RFI identifies the core components “expected in a renewed capability” but does not define the shortcomings of the current model, nor does it identify how the model does not meet requirements.
10. Further, based on CTA’s involvement in numerous forums such as the NAAD System Governance Council and the Alerting Technical Working Group, it is not aware of any systemic issues or challenges with the current system that would require addressing via a potential move to a new vendor. In fact, emergency management officials and PSC participate within both forums and have not raised items within those forums for review or action.
11. CTA respectfully submits that for stakeholders, like LMDs, it is difficult to provide meaningful and reasoned feedback via an RFI process without a clearer understanding of PSC’s objectives and areas of concern. The identified core components (message creation, authentication and access control, aggregation services, and user support and references³) are already in place,

¹ Pelmorex, “[Alert Count](#)”, Alert Ready Emergency System (Dec 31, 2019).

² Pelmorex, “[Alert Count](#)”, Alert Ready Emergency System (Dec 31, 2025).

³ RFI, in “**1.3 Operational Context**” section:

“Message Creation: Minimum one certified tool for use by authorized government users to author compliant alert messages

Authentication and Access Control: Mechanism to ensure only authorized individuals, organizations or systems can send alerts

albeit they may require additional augmentation which can only come with the development of a governance model that has authority over alert issuers and secure funding.

12. Undeniably, based on practical experience, the current Alert Ready system is functioning well, and is being used to inform and warn Canadians of a broad range of hazards as intended.
13. In this context, CTA is concerned that pursuing the development and implementation of an entirely new public alerting system, absent a clear articulation of deficiencies in the existing one, introduces unnecessary operational, technical, and public safety risks. Replacing a system that is demonstrably functional, widely adopted, and relied upon during emergencies carries inherent risks of service disruption, transitional failures, increased complexity, and the unnecessary expenditure of taxpayer dollars and additional costs being imposed on other stakeholders, with no assurance that a replacement would deliver superior outcomes.
14. These risks are particularly acute in the public alerting context, where system reliability, predictability, and continuity are paramount. Any degradation in performance, delays in alert dissemination, or confusion among alert issuers or last-mile distributors during a transition could have real-world consequences for public safety.
15. If there are specific concerns with the current Alert Ready system, we submit that these should be clearly identified and assessed in collaboration with stakeholders, with consideration given first to targeted enhancements, governance reforms, or incremental improvements to the existing model. Such an approach would better leverage the substantial investments already made, preserve system stability, and reduce the risk of unintended consequences associated with wholesale replacement.
16. Absent a demonstrated need for replacement, and without clarity on the problems a new system is intended to solve, CTA respectfully questions whether a full vendor transition represents the most prudent, efficient, or risk-managed path forward for Canada's public alerting capability.

CTA responses to ANNEX A - 1.2. Last Mile Distributor Implementation Considerations

The Government of Canada is seeking perspectives of Last Mile Distributors (wireless service providers, and television and radio broadcasters) who are required by the CRTC to carry alerts. It

Aggregation Service: Capable of connecting to alert originators (including directly with early warning and forecasting systems) and distributors, rapidly processing alerts, and making them available to distribution channels

- o Georedundant data centres and redundant network connections for high availability
- o Real-time system monitoring, performance analysis and health checks

User Support and Resources: Comprehensive guides, manuals and a support desk"

seeks to ensure a renewed model considers the perspectives of Last Mile Distributors and supports them in meeting their CRTC obligations.

a. What operational, technical, or regulatory considerations should be taken into account from your perspective as a last-mile distributor when implementing a new public alerting service delivery model? Please identify any potential challenges and recommended mitigations.

Current System

17. Today's Alert Ready system is a joint federal-provincial-territorial and industry effort that delivers life-saving information efficiently. In fact, the current system is the direct result of years of evolution and collaboration, built on the notion of incorporating new technology into an expanding toolbox.
18. The system utilizes more than 2,800 LMDs to deliver alerts that are issued by over 195 organizations and 1,500 authorized individuals⁴ and disseminated via the NAAD System across Canada.
19. This, in and of itself, speaks to the complexity that is in place and points to the success of what has been collectively built.
20. From the WSP perspective, the current system meets all of the identified core components and provides a solid foundation where additional upgrades might be required.
21. Alert Ready already provides a proven, trusted, and nationwide way to warn people quickly during emergencies:
 - **Proven reliability in emergencies:** The system is currently being used for a variety of alert types including severe weather, AMBER alerts, evacuations, and is known to work under pressure. The hard lessons have already been learned. Replacing it with a new and untested system introduces risk during critical moments.
 - **Public recognition and trust:** People recognize Alert Ready, and how messages are sent. Familiarity reduces confusion and increases the likelihood that people take action quickly.
 - **Speed and consistency of messaging:** A known system allows authorities to send clear, consistent, and authoritative messages without delays caused by new and unfamiliar technology.
 - **Interoperability with emergency agencies:** Alert issuers are already trained on the current system and it is integrated within existing response protocols and infrastructure.
 - **Cost-effectiveness:** Maintaining and improving an existing system is typically far less expensive than designing, deploying, and training for a completely new one. This is

⁴ RFI, in "1.3 Operational Context" section, PSC identifies the number of LMDs and authorized users.

especially relevant when the number of LMDs and alert issuers is factored into the discussion.

- **Ability to evolve without replacement:** The current system can be upgraded to meet any newly identified needs without discarding the entire framework. The current system is a testament to this very type of evolution.
- **Made-in-Canada solution:** Pelmorex is a Canadian company that has operated the NAAD System since the implementation of the alert system.
- **Regulatory framework:** an established regulatory framework that obligates LMDs to participate in Alert Ready is already in place.

22. Maintaining the current Alert Ready system preserves a trusted, reliable, and widely accessible public safety tool while allowing for incremental improvements rather than a risky and costly replacement.

Place Focus on Areas of Greatest Impact

23. CTA notes the two elements that would have the greatest impact on the long-term stability, reliability and growth of an alerting system are: governance and funding.

Governance

24. The lack of an overarching governance model/structure has been a detriment to the overall public alerting environment. Without a clearly identified governance structure, there is no mechanism in place that articulates how decisions are made, nor who is responsible for ensuring their implementation as it relates to public safety organizations. That leads to unnecessary confusion among stakeholders, and an inability to ensure that decisions are universally applied.
25. To be clear, LMDs are federally regulated by the CRTC and are required to participate in the alerting system as a condition of service. In their role, they are “dumb pipes” in the transmission of the message, however, how they participate is clearly identified, as are operational requirements such as reporting. Any changes that are required to how LMDs participate are initiated by the CRTC via a public consultation process that weighs the cost/benefits of potential changes. The consultation process also solicits input from a broad and diverse group of Canadians. No such obligations exist for governments or alert issuers.
26. To date, Pelmorex has managed governance issues within its structure, however, it has always been clear that many of the issues or items that are raised fall outside of what could reasonably be considered Pelmorex’s scope or areas of influence.
27. Pelmorex has put in place a governance model for the operation of Alert Ready itself (i.e. the infrastructure, and the policies to support it), that includes members of the alerting chain but

much of the processes and procedures for key parts of the system fall within Federal, Provincial and Territorial (FPT) government structures that are not transparent. Additional work groups have also been implemented with the intent of including all stakeholders in discussions that are relevant to them (for example, the ATWG as well as the communications group for public testing).

28. A key undertaking of PSC should be the development of an inclusive governance framework for alerting.
29. LMDs understand that the alerting system is intended for use by government, however, given their significant role in providing the infrastructure, they are also critical partners and need to be included where decisions impact them. For example, changes made to how messages are to be distributed, or changes to messages themselves, may impact the equipment that is used. LMDs should have an opportunity to provide feedback in advance of actual decisions being made.
30. All stakeholders need to be included to ensure decisions are informed by diverse perspectives, expertise, and lived realities that directly affect outcomes. When key stakeholders are represented, governance processes are more transparent, credible, and accountable, reducing the risk of blind spots, resistance, or misaligned priorities. Inclusive governance also fosters trust, which strengthens commitment to decisions and improves coordination during implementation. Ultimately, inclusion leads to more balanced, resilient, and effective decision-making, as policies and actions are shaped by those who both influence and are impacted by them.
31. Further, having a clear governance mechanism in place will be necessary to address many of the items that have been raised in the current CRTC consultation process⁵ in relation to accessibility, languages, and alert reach.

Funding

32. Alert Ready has historically been funded via mandatory carriage and wholesale fees of Pelmorex's licensed broadcasting service The Weather Network/MétéoMédia by Canadian broadcasting distribution undertakings (BDUs). Given the rapidly declining revenues of BDUs, this model of funding is unsustainable and unreliable.⁶ With the *Canada Strong Budget 2025* allocation of \$55.4 million over four years (starting in 2026-27) and an annual \$13.4 million thereafter, funding is now more reliable and consistent.

⁵ Telecom and Broadcasting Notice of Consultation CRTC 2025-180, Call for comments – Improving the public alerting system.

⁶ Broadcasting Decision CRTC 2018-342, The Weather Network/MétéoMédia – Licence renewal and renewal of mandatory distribution order, at paragraphs 97-100.

33. Decisions that may have previously been driven by uncertainty or budget constraints are no longer facing similar challenges. This will more easily allow PSC to work with Pelmorex to ensure any outstanding requirements are met without unnecessarily burdening LMDs with costs and risks.

34. Maintaining government funding for the system is essential.

b. What factors would influence your ability to adopt and integrate a new public alerting service delivery model within your systems and processes? Please outline any dependencies, resource requirements, or constraints that could impact implementation timelines.

New System

35. As CTA has noted, it is difficult to reasonably identify factors that would influence the adoption and integration of a “*new public alerting service delivery model*” without understanding what that model included and how it differed from the current NAAD System.

36. Implementing any **new** system requires significant resourcing, from human to financial. It will also require substantial time to ensure that the system is working fully as intended.

37. Service providers and networks are not homogeneous and how each will approach implementation from a practical point of view will be different. In addition to the development and implementation of the NAAD-type system itself, LMDs would each be required to identify impacts to their operations and networks. Testing would also be required.

38. The process to identify how WSPs would be included in the current system began in May 2016,⁷ and included work within the CRTC Interconnection Steering Committee (CISC) to identify standards and timing. It wasn’t until April 2018, a full year after the CRTC issued its decision, that the system was implemented. While this can provide some insight into timing, it is a high level “guess” and dependent on multiple factors including other implementation work underway,⁸ the requirement to develop standards, and vendor-related abilities. The cost of implementing a new system, especially in the current economic environment, will also be higher.

39. Enabling WPA nationally required the wireless industry to invest an estimated \$18-\$25 million. This does not include any annual costs associated with maintenance or network investment.

⁷ Telecom Notice of Consultation CRTC 2016-115 - *Call for comments - Participation by wireless service providers in the National Public Alerting System.*

⁸ WSPs are currently investing significant resources to multiple other public safety related initiatives including the migration to NG9-1-1, and changes to 9-8-8 call routing.

While a budget has been identified by the Government of Canada to support alerting, it is not clear whether any of this budget would be used to support LMDs, including WSPs, in system/network changes or deployment activities.

40. CTA expects that additional discussion will be required to determine specific impacts to LMDs

c. What challenges might you have previously faced in implementing changes to the NPAS, and fulfilling your CRTC obligations? How might these be addressed in a renewed model? Are there best practices that would be considered?

Implementing NPAS Changes

41. Any changes that have been required of LMDs to this point have required alert issuers to engage within CRTC processes. For example, the move to two public facing test alerts required the filing of a Part 1 Application, which allowed for all impacted stakeholders to provide comments which aided the CRTC in reaching a suitable decision.

42. It is imperative that LMDs continue to be consulted for changes that are being considered to the NAAD System to mitigate any unintended impacts.

CRTC Obligations

43. A significant amount of information has been placed on the public record via multiple CRTC proceedings. The information clearly identifies the reasoning for how the current system operates:

- *Broadcasting Regulatory Policy CRTC 2014-444 and Broadcasting Orders CRTC 2014-445, 2014-446, 2014-447 and 2014-448, Amendments to various regulations, the standard conditions of licence for video-on-demand undertakings and certain exemption orders – Provisions requiring the mandatory distribution of emergency alert message*
- *Telecom Regulatory Policy CRTC 2017-91, Implementation of the National Public Alerting System by wireless service providers to protect Canadians*
- *Telecom and Broadcasting Notice of Consultation CRTC 2025-180, Call for comments – Improving the public alerting system.*⁹

44. WSPs are provided with specific direction from the CRTC as to the nature of their involvement within alerting. CTA expects that the CRTC would continue to provide regulatory oversight and authority within any new model. In effect, CTA would expect that no additional obligations or requirements would be necessary or warranted.

⁹ The CRTC is currently consulting Canadians on upgrades to the existing system, and this may have further impacts on LMDs.

CTA Response to ANNEX B – Requirements

45. Any discussion concerning business and functional requirements for a new system should be rooted in meeting specific identified needs, and based on an understanding of what the current system can and cannot deliver.

Terminology

46. Within the RFI, PSC uses the terminology “SMS messages”, “SMS” and “SMS text message service”. For clarity, CTA notes that alert messages are currently disseminated by wireless service providers via cell broadcast. To that end, while they may look similar to an SMS, they are not SMS messages in the commonly referred to sense.
47. Significant time and discussion occurred in order to determine that cell broadcast provided the optimal message delivery mechanism for wireless public alerting. Public alerting must continue to use cell broadcast rather than SMS, due to these key differences:
- **Network Usage:** Cell broadcast uses a separate, less congested part of a WSP’s network, whereas SMS uses the primary messaging channel.
 - **One-to-Many:** Cell broadcast sends messages to all devices in a cell tower’s range without needing telephone numbers, while SMS sends messages to individual subscriber telephone numbers.
 - **Delivery:** Cell broadcast delivers messages simultaneously, like a radio broadcast, to everyone in an area.
 - **No Reply/Tracking:** A message recipient cannot reply to a cell broadcast message, and individual delivery is not tracked.
48. CTA expects that cell broadcast over LTE networks will be maintained as the mechanism for WSP message distribution, and suggests that proper terminology is used to avoid confusion.

Conclusion

49. In closing, CTA reiterates its support for maintaining the current NAAD System and recommends that it serves as the basis for the “renewed model” being contemplated by PSC. Focus should be placed on elements related to governance and funding in order to ensure that the alerting system has a solid footing on which to build any new capabilities.
50. A significant amount of time and resources have already been collectively put into the development of the current system, and it continues to provide alert issuers with a mechanism that effectively provides alerts to Canadians.

51. CTA would welcome the opportunity to provide additional feedback on WSP-impacting items as PSC develops a clearer understanding of its needs, and identifies relevant next steps.
52. We appreciate the opportunity to participate in this important consultation and look forward to the ongoing collaborative efforts with all stakeholders and partners.

Kind regards,



Ursula Grant,
VP Industry and Consumer Affairs

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