



Submitted via email

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Re: Proposed Revisions to National Public Alerting System Common Look and Feel Guidance

As the national voice of Canada's private radio and television broadcasters, the Canadian Association of Broadcasters (CAB) is pleased to provide its comments to the Federal/Provincial/Territorial Senior Officials Responsible for Emergency Management (SOREM) Public Alerting Working Group (PAWG) in regard to proposed modifications of the National Public Alerting System (NPAS) Common Look and Feel (CLF) Guidance.

Our members take their responsibility as last mile distributors (LMDs) very seriously as part of their commitment to contribute to the ongoing safety of Canadians. The CAB supports the efforts of SOREM to improve the effectiveness of emergency alert messages and agree that modification of the CLF Guidance is the most efficient means to do so. That said, the CAB wishes to bring certain important operational considerations forward for your attention. We also have two specific recommendations to improve upon the proposed changes to the CLF Guidance, as elaborated on below.

Background

The CAB participated in the development of the CLF Guidance when first introduced in 2015, and again in 2018 when the Guidance was updated to incorporate wireless alerting. Great effort was put into balancing the operational, technical and implementation considerations with the goal of maximizing the effectiveness of alert messages as well as acceptance by the public.

This effort included achieving consensus of all stakeholders and arriving at agreed upon terms regarding message length, maximum number of characters, duration of audio messages, and, for television displays, text crawl speed. For radio and television broadcasters, this resulted in a maximum message length of 1800 characters. The manufacturers of alerting equipment for LMDs have used this maximum message length in their engineering designs. As such, modification of the message length may have larger implications.

One of the strategies to maximize the effectiveness of alert messages and acceptance by radio listeners and television viewers was the provision of paragraph 8.2.6 in the CLF Guidance:

When a [Common Alerting Protocol] alert message includes two or more languages, the LMD should present the audience alert message in the language(s) best suited to the community they serve in accordance with any applicable regulatory or legislative requirements, e.g. bilingual community.

In the majority of cases, this has meant that radio and television stations relay emergency alert messages in the language in which they are licensed by the CRTC, either English or French.

Further, paragraph 8.2.7 reads; *“When presenting audience alert messages in more than one language, the first language transmitted should be the principal language of the distribution medium.”* Paragraph 8.2.5 provides; *“LMDs are not expected to translate audience alert messages.”*

Discussion

The Consultation has been issued as a result of concerns raised by the Commissioner of Official Languages. The issue has been defined as follows: *“Emergency alert messages are not always being broadcast in both official languages, when those messages are issued in both official languages.”*

It should be noted that not all Federal, Provincial and Territorial (FTP) issuers of emergency alerts currently issue alert messages in both official languages. Further, the urgency of issuing an alert message should not be delayed if a translated version is not immediately available. Hence, the proposal in the Consultation document that emergency alert messages should be broadcast in both official languages when issued in both official languages will not eliminate the problem of the issuance and distribution of alerts by FTP issuers in only one language.

We also note that it is not clear how many of the 85 complaints received by the Commissioner of Official Languages in 2018 and 2019 related to emergency alert messages that were in fact issued in both official languages, or whether the issue was that they had been issued in only one language.

Operational Considerations

Any change to the CLF Guidance affecting how emergency alert messages are distributed by radio and television LMDs should be careful to not cause listener/viewer fatigue, “tune out” or disregard of the alert message. This would diminish the great benefit that the introduction of NPAS has had on the safety and wellbeing of Canadians.

As noted above, the current maximum message length is 1800 characters which generates an audio message of about two (2) minutes in length when processed through the NAADS¹ text-to-speech software. Paragraph 8.14.2 of the CLF Guidance reads, “*Audio content that is to be distributed over TV and radio should not exceed 120 seconds in duration per language.*” This is already a considerable length of time to interrupt programming. Radio and television stations get telephone complaints from listeners and viewers about what is perceived as a disruption, particularly if the alert does not affect them directly. A solution would be to limit the total duration of any bilingual audio alert to 2 minutes, or effectively 900 characters per language.

In comparison, emergency alert messages for wireless LMDs have a technical constraint of a total maximum of 600 characters for both official languages. The message length does not have to be equal for English and French, but cannot exceed 600 in total.

There is another provision of the CLF that would require review to fully support the delivery of bilingual alert messages. Paragraphs 8.15.1.2 and 8.15.2.2 provide, “*Automated broadcast interruption need not be used if a person can immediately present the text of an audience alert message verbally and visually mindful of the other guidance found in this document. The Canadian Alerting Attention Signal should be played just prior to presenting the text.*” This feature is especially important if the emergency incident is already being broadcast live by a radio or television newsroom. Equally, ethnic and multicultural stations can benefit from this capability. It may not be practical, in some cases, to present the text of bilingual messages if/when an automated message is not desired or available.

The CAB is of the view that emergency alert messages which are relayed over radio and television are more impactful to the Canadian public when less than 2 minutes in length (total 1800 characters) and broadcast in the language of CRTC licence, either English or French.

Technical and Implementation Considerations

Some broadcasters are using emergency alerting equipment that can support bilingual emergency alert messages, while others use equipment that cannot do so. The extent of this technical constraint is not fully understood at this time.

¹ The National Alert Aggregation and Dissemination (NAAD) System operated by Pelmorex Communications Inc., Canada’s designated aggregator and disseminator of emergency public alert messages.

One manufacturer has informed us that one of its models is not currently capable of supporting bilingual messages and would require a software upgrade that does not currently exist. This manufacturer has suggested that three to four months would be needed to write and test the software upgrade. It would be impractical for the manufacturer to develop the software upgrade until after a revised CLF Guidance document is approved so that all required changes are taken into account.

Another manufacturer has advised that its equipment can be upgraded with an existing bilingual software module at a cost of US\$550 per device.

An additional and yet undetermined amount of time would be needed by broadcasters to install, upgrade and field-test emergency alerting equipment at their studios. Note that one emergency alerting device is required per broadcast station as they must be individually programmed to broadcast only the alerts which are intended within their licensed coverage area.

The total costs to make all the changes that may be needed are not yet known. Broadcasters have been under pressure for many years from declining revenues, and not in a good position to support incremental financial and human resources at this time.

Recommendations

In principle, the CAB supports the broadcast of bilingual emergency alert messages when those messages are issued in both official languages. However, the information presented in this submission illustrates that there are important considerations, including technical and implementation concerns, as well as issues regarding disruption to listeners and viewers. As a result, we believe that simply removing paragraph 8.2.6 of the CLF Guidance would be inappropriate.

Therefore, the CAB recommends:

- When emergency alert messages are issued in both official languages, it should be mandatory for radio and television station LMDs to broadcast in the language of their CRTC licence, and voluntary to broadcast bilingual alerts. If bilingual messages are distributed, the broadcaster should endeavour to broadcast the emergency alert first in their licensed language, either English or French.
- Emergency alert messages should be restricted to 1800 characters (approximately 2 minutes) in total length. Therefore, for bilingual messages, the message length in English and French would have to be shorter while conveying the same message content in both official languages.

The Consultation notes, *“a revised guideline will also need to take into account the ability to support delivery of audience messages in languages other than French and/or English.”* The CAB suggests that the introduction of third language emergency alert messages may uncover constraints or challenges that are not yet understood. The CAB would be pleased to participate in a separate review of the possibilities for third language emergency alerts.

The CAB strongly recommends that the current CLF Guidance should not be modified until proposed changes are fully vetted by the Alerting Technical Working Group (ATWG), which reports to PAWG. In this way, the needs of all stakeholders will be taken into account with the same spirit of collaboration that resulted in the current CLF Guidance document.

Finally, we note that CAB members will need a suitable amount of time to implement upgrades once changes to the CLF Guidance are agreed upon.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Desjardins', with a stylized flourish at the end.

Kevin Desjardins
President
Canadian Association of Broadcasters