



Sent via Intervention Form

21 November 2025

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Secretary General
Canadian Radio-television and
Telecommunications Commission
Gatineau, Quebec
K1A 0N2

**Re: Comments of the Canadian Association of Broadcasters with respect to
Broadcasting Notice of Consultation CRTC [2025-180](#)**

Call for comments – Improving the public alerting system

1. The Canadian Association of Broadcasters (CAB) is the national voice of Canadian privately-owned and operated broadcasters. Representing small, medium and large radio and television stations across the country, and national discretionary services, the CAB advocates for a vibrant, diverse, and competitive broadcasting system that serves all Canadians.
2. Since its founding in 1926, the CAB has been a trusted leader in policy development, regulatory affairs, and public dialogue, working closely with government, regulators, and industry stakeholders. Our members are committed to delivering high-quality Canadian content, supporting local news and journalism, and reflecting the voices and stories of communities from coast to coast to coast.
3. As the broadcasting landscape evolves, the CAB advocates for fair and forward-looking policies that ensure Canadian broadcasters can thrive in a digital age, protecting the sustainability of local media, promoting innovation, and strengthening Canadian identity and culture.
4. With these broad objectives in mind, the CAB is pleased to provide its comments on the above noted call for comments.

5. As Commission considers ways to improve the public alerting system, the CAB urges the Commission to prioritize the following key considerations:
- First, radio and television stations are but one part of the larger National Public Alerting System (NPAS) that also includes cellphone service providers and cable and satellite television providers. Television stations, in particular, are a very small part of the system – for the vast majority of their audiences, alerts are provided by the broadcast distribution undertakings (BDUs) that carry them (only on the order of 6% of the population receives their signals over-the-air¹). And radio stations are a unique and discrete part of the alerting system, since they only provide emergency alerts as audio content.
 - Second, in any consideration of possible new regulatory obligations, the Commission must be cognizant of the impact of such obligations, and any associated administrative burden, on radio and television stations that are already facing significant financial challenges. With significantly declining revenues, and all-time-low profitability levels of 3% and negative 29% respectively, radio and over-the-air television stations are already having to make tough decisions in order to stay on air. Any increase to their regulatory or administrative burden risks increased cutbacks in service to audiences, or worse, closures. Given point one above, the Commission should consider flexible and adaptable approaches to public alerting requirements that align with the unique business models of specific types of last-mile distributors – i.e. radio and television stations need not be treated the same as cell-phone providers and BDUs.
 - Third, the needs and interests of Canadians must be at the forefront in any consideration of possible changes to the NPAS. Viewers and listeners see alerts as a disruption to their radio and television programming – radio and television stations often receive complaints. With the increasing volume of alerts, we must be sensitive to viewer/listener fatigue and tune-out. Therefore, alerts must remain short and of limited duration. Adding languages in radio and television alerts could exacerbate viewer/listener frustration, fatigue and tune out, and increase complaints. First, alerts on TV and radio are already typically longer in duration (up to 1800 characters per language) compared to wireless alert messages (maximum 600 characters combined for both official languages). Second, a person can glance at a wireless alert on their mobile device and look away at their choosing. But TV and radio audiences are subject to the full duration of the alert message before they can resume programming.
6. With these three important points to set the context, the CAB now turns to answering the Commission's questions.

¹ As reported, for example, in thinktv's [tv basics](#), September 2025

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?

7. With respect to broadcasters, we do not believe that the CRTC need take any additional measures, given the following:

- the *Radio Regulations* (at section 16(6)) and the *Television Broadcasting Regulations* (at section 18(6)) (the Regulations) already include an obligation to take all reasonable efforts to broadcast alerts in conformity with the *National Public Alerting System Common Look and Feel Guidance* (the CLF Guidance), as follows:

(6) The licensee shall take all reasonable measures to ensure that the alerts that it broadcasts are in conformity with the specifications and recommended practices set out in the document entitled National Public Alerting System Common Look and Feel Guidance, produced at the request of the Federal/Provincial/Territorial Public Alerting Working Group of Senior Officials Responsible for Emergency Management with the support of Defence Research and Development Canada, Centre for Security Science, Canadian Safety and Security Program, and in consultation with the public-private Common Look and Feel Working Group, as that document is amended from time to time.

- the CLF Guidance was amended just last year to require the presentation of French and English messages when an alert is issued in both languages.
8. That said, we urge the Commission to keep in mind the unique nature of radio and over-the-air television stations in the overall NPAS. In particular, issuing alerts in both official languages doubles the message length and could contribute to additional listener/viewer frustration, fatigue, confusion or tune out.
9. We believe that the Commission must distinguish between different types of last mile distributors (LMDs). In particular, we believe that while radio and television stations should be *required* to provide alerts in the language for which they are licensed, they should only be *encouraged* to provide alerts in both official languages. This is a more audience-friendly approach.

10. As described in our submission to the Federal/Provincial/Territorial Senior Officials Responsible for Emergency Management (SOREM) with respect to proposed changes to the CLF Guidance (attached as Appendix 1), a great deal of effort went into the development of the CLF Guidance to establish 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.
11. Before the CLF Guidance was amended, it supported the effectiveness of alert messages for radio and television through a provision that required LMDs to present the alert in the language best suited to the community they serve. In practice, for radio and television stations, this meant the language for which they are licensed by the CRTC.
12. We remain concerned that distributing alert messages in both English and French (and in any other languages) on radio and television stations could result in listener/viewer fatigue, tune-out or disregard of the alert message, diminishing the effectiveness and benefits of the NPAS. Radio and television stations already receive complaints about what is perceived as a disruption to their programming, particularly if the alert does not affect the listener/viewer directly.
13. Another important distinction between wireless alerts and those broadcast over television and radio is that the geographic area for wireless alerts can be extremely targeted while broadcast alerts must be carried throughout the entire coverage area of the station. This can have the effect of over-alerting to populations that are not directly affected by the emergency alert.
14. Accordingly, we urge the Commission to be liberal in its interpretation of the statement in the Regulations of “*all reasonable measures*” as radio and television station LMDs implement the CLF Guidance.
15. Given, as well, that they are only one cog in the broader NPAS, and that alerts are being made by other types of providers in both English and French (in accordance with the revised CLF Guidance), radio and television stations should be *required* to provide alerts in the language of their CRTC licence, and *encouraged* to broadcast alerts in both English and French, when they are provided to them by emergency management officials (EMOs). The Commission should specify this distinction when it sets out its policy determinations on this consultation process.

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?

16. We understand that Nunavut has been issuing alerts in two Indigenous languages by “tricking” the National Alert Aggregation and Dissemination System (NAADS) by putting Indigenous language text in the English-language field of the message. This can cause errors in the text message and also gibberish in the text-to-speech audio file. If languages other than English and French are to be added to the NPAS, a more systematic approach will be required.

17. We note that adding Indigenous or other languages will require upgrades to the NAADS, in addition to the technologies currently used by radio and television stations which may not support additional language fields.

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

18. The CAB is concerned that the introduction of languages other than English and French may raise additional cost, technical and operational considerations. We understand that the equipment manufacturers have now updated their technologies to support bilingual alerts, but adding languages other than English and French will require additional upgrades across the entire system. It will also be necessary to explore what technical upgrades might be necessary to support additional character sets at every point along the chain, including any text-to-audio requirements. Finally, the impact on listeners/viewers must also be considered if message length is increased.

19. The Commission may also wish to consider the fact that AI generated language translation is evolving quickly in all manner of consumer devices and apps. Language translation in the device or via an app, at the choice of the consumer, may be a more efficient and effective way to ensure alerts are provided in multiple languages.

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?

20. For the reasons set out above, we believe it is premature for the Commission to take any steps toward the distribution of alerts in languages other than English and French, including Indigenous languages.

21. Adding other languages should only be considered after there has been a broader discussion of the issues amongst all of the organizations involved in the NPAS, including SOREM and the NAAD System Governance Council, with a view to better understanding any operational, technical and cost considerations.
22. Also, for perfect clarity, as set out in the CLF Guidance, it is the EMOs that are responsible for providing alerts, and therefore, it is their authority and their responsibility to issue alerts and to decide if they will issue in more than one language. Broadcasters should not be responsible for any translation of alerts.

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?

23. On radio, alerts are provided only in an audio format. Although FM radio has some limited text capability and HD radio can support limited graphics, we do not believe that expanding emergency alerts in this manner on radio would be accurate or reliable. The reason is that radio receiver designs are at the discretion of (primarily) the automobile manufacturers. Receiver behaviour has a wide variance and is out of broadcasters' control. Further, the radio receivers that can display text or graphics are primarily in automobiles where driver distraction could be an issue.
24. On television, alerts are provided with both audio and video (text). They are reasonably accessible as they stand.
25. We are aware that other jurisdictions are evaluating enhanced features and capability for emergency alerts in the future evolution of television technology. For example, the US is studying enhanced features for ATSC 3.0. ATSC 3.0 is currently experimental in Canada and a long way from adoption.
26. It is also important to acknowledge that television and radio stations play an important role in the communities they serve by providing additional coverage, for example, through their news and information programming, which, on television, is provided with captions for listeners who may be blind or have vision impairment.
27. We also note that there are apps available or under development, for example, [Alertable](#), and we are aware that the development of a national Alert Ready app has been raised within the NAAD System Governance Council though we are unsure of its status. Such apps may be able to provide additional accessibility features. We would encourage the Commission to explore apps and other such solutions as possible mechanisms for improving the accessibility of the NPAS.

28. Further, there are some important technical and operational considerations as well. If there are changes to the NPAS to address the accessibility of public alerts, there will be cost and resource implications to upgrade or replace the emergency alerting equipment in all radio and television stations and across the system. We are not sure of the total cost of any such upgrades but wish to remind the Commission that broadcasters have been under financial pressure for many years and cannot support additional financial (and human resource) burden.

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?

29. We have no particular insights to provide in response to these questions at this time.

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.

30. Yes, we believe that the current biannual schedule is appropriate.

31. Even though not all EMOs participate in every test, all broadcast stations do participate. Radio and television groups often have emergency alerting equipment deployed across multiple stations across the country, sometimes in very remote locations. The tests help to uncover hardware or configuration faults not only in the emergency alerting equipment but also in the studio facilities and on-air chain of the stations.

32. Further, broadcasters are able to coordinate non-visible tests through the NAADS operator, Pelmorex. This allows broadcasters to troubleshoot specific problems.

(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?

33. We think it is appropriate to have greater flexibility in the timing of visible NPAS testing.

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:

(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?

34. We have no particular insights to provide in response to these questions at this time. However, we note that broadcasters are required to file an annual “emergency alert implementation report” which asks them (among other things) to confirm whether they have installed, maintained and tested alert message distribution equipment, whether they received and distributed the bi-annual public test alerts, and whether there have been any issues with the distribution of alert messages in the previous year. They can also submit a “public awareness test checklist” to Pelmorex on an as-needed basis.

35. In our view, such reporting is a sufficient mechanism for the Commission to ensure that broadcasters are connected to the NPAS and distributing alerts to the public. That said, the CAB believes that – in accordance with section 5(2)(g) of the *Broadcasting Act* and section 8(a) of the [*Order Issuing Directions to the CRTC \(Sustainable and Equitable Broadcasting Regulatory Framework\)*](#) – the Commission should take every opportunity to reexamine the reporting requirements that apply to Canadian broadcasting undertakings with a view to reducing unnecessary ‘red tape.’ In the case of the public alerting reports, the Commission should review its questions to require only what is actually necessary and not duplicative of information filed in previous years.

36. All of which is respectfully submitted.

Yours sincerely,

[Original signed by]

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