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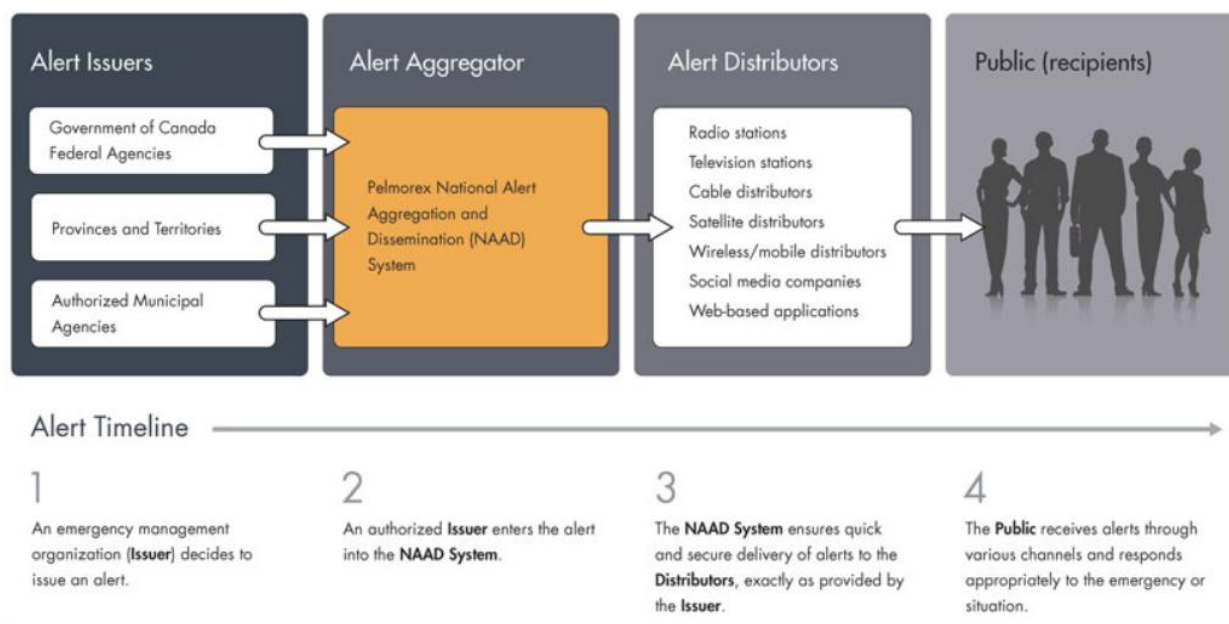
Marc Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Gatineau, Quebec
K1A 0N2

**Re: Reply 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. As the national voice of small, medium and large Canadian privately-owned and controlled radio and TV broadcasters, the Canadian Association of Broadcasters (CAB) is pleased to provide these reply comments with respect to the Commission's call for comments on improving the public alerting system.
2. We read with a great deal of interest the interventions of various stakeholder groups, particularly those filed by groups that represent people with disabilities, as well as the Neil Squire study, added to the public record by the Commission. These parties have raised important considerations about the accessibility of the public alerting system, and their submissions are informative, eye-opening, and educational. We will be adding these documents to our reference materials for our members who wish to improve their understanding of the issues that face people with disabilities as they access the Canadian communications ecosystem.
3. Indeed, the CRTC is to be congratulated for creating a space for people to bring their concerns forward. These parties have raised important and valuable aspirational goals for improvements to the National Public Alerting System (NPAS). We urge the Federal/Provincial/Territorial Senior Officials Responsible for Emergency Management (SOREM) to take these matters into consideration as they consider upgrades to the system in the future.

4. Which brings us to a very important point that bears repeating. The NPAS is a collaborative initiative of many partners, with the CRTC playing a supporting role as the regulator of cellphone providers, cable and satellite television providers, and radio and television stations – key distributors of emergency alerts (also known as “last mile distributors” (LMDs)).
5. We found the image shared by CBC/Radio-Canada to be quite illuminating:¹



6. This image serves as a reminder that there are many parts to the public alerting system, and that each has a role to play in considering the sorts of issues raised by the Commission in its call for comments and in the responses of key intervenors. The Commission’s role in making the changes recommended by some parties may only be one of making recommendations to alert issuers, to SOREM and its working groups, or to the National Alert Aggregation and Dissemination (NAAD) System Governance Council rather than through any direct action the Commission may take.
7. In this context, we also wish to remind the Commission that over-the-air radio and television stations are only one small part of the broader system, with unique characteristics and challenges.
8. In considering some of the aspirational appeals of various stakeholders, we urge the Commission to take a practical and realistic approach when considering the obligations it may impose on radio and television providers in Canada. For example, with respect to the proposals to address accessibility, Indigenous languages and third languages, it is clear that the present NAAD system does not currently have the technical capability to relay such enhanced content.

¹ For a description of this image, please see Public Safety Canada’s page on the National Public Alerting system: <https://www.publicsafety.gc.ca/cnt/mrgnc-mngmnt/mrgnc-prprdnss/ntnl-pblc-lrtng-sstm-en.aspx>

9. In addition, as noted by several broadcasters in the present proceeding, rules regarding the provision of alerts on radio and television stations must take into consideration the unique characteristics of the medium in question. As stated by CBC/Radio Canada, for example:

*radio is the only LMD which relays the alerts to the public without text, **only in an audio format**, which interrupts and completely supersedes the programming of a radio station that is licensed to provide services in one of the official languages and that a listener chooses to tune in.*

10. Harvard Media and Golden West Broadcasting both highlighted that providing alerts in both languages can actually be harmful, rather than beneficial:

On English-language stations, this challenge is compounded when alerts are repeated in French. In an emergency, time and clarity are paramount; hearing a second-language repeat can dilute the urgency of the message and reduce its effectiveness for the overwhelming majority of listeners. [Harvard Media]

Being forced to air alerts in English and French would only serve to clutter up the on-air sound and further frustrate, alienate our audience(s), providing yet another reason for our listeners to seek out an alternate platform. [Golden West Broadcasting]

11. Like the CAB, Cogeco and other broadcasting companies recommended that when an alert is issued in both English and French through the NAAD system, LMDs should only be required to distribute alert messages in the language for which they are licensed – to avoid listener confusion, incomprehension and disinterest – especially on radio.
12. 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. Just a few weeks ago, every Toronto media signal was interrupted multiple times about a boil water advisory for Collingwood, over two hours away from Toronto.
13. Therefore, as the Commission considers ways to improve the public alerting system, we urge it to keep the following key considerations in mind:
- First, radio and television stations are but one part of the larger alerting system. They can also support emergencies situations in other ways, including through their news and information programming.
 - Second, viewers and listeners see alerts as a disruption to their radio and television programming. With the increasing volume of alerts, we must be sensitive to viewer/listener fatigue and tune-out. Therefore, alerts must remain concise and of limited duration. Adding languages in radio and television alerts could exacerbate viewer/listener frustration, fatigue and tune out, and increase complaints.

- Third, 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.

14. Given these considerations, the Commission should consider flexible and adaptable approaches to public alerting requirements that align with the unique business models of specific types of LMDs – i.e. radio and television stations need not be treated the same as cell-phone providers and BDUs.

15. Finally, keeping in mind that they are only one cog in the broader NPAS and that alerts are also provided by other types of providers (e.g. BDUs and mobile providers), when alerts are issued through the NAAD system in both English and French, over the air television and radio stations should have the option of relaying only the version of the alert in the language for which they are licensed. In this way, alerts will be provided in the language chosen by the viewer/listener. This is a more audience-friendly approach and aligns with obligations under the *Official Languages Act*. We believe the Commission should provide this specificity when it sets out its policy determinations on this consultation process.

16. All of which is respectfully submitted.

Yours sincerely,

[Original signed by]

Kevin Desjardins
President | Canadian Association of Broadcasters

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