



**Sent via Intervention Form**

27 January 2026

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

**Re: Final 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 final comments with respect to the Commission's call for comments on improving the public alerting system.
2. We have reviewed the reply comments filed in December and acknowledge that parties have raised important considerations about desired and necessary improvements to the alerting system. For clarity, private broadcasters do not oppose the upgrades recommended by accessibility groups and those seeking alerts in Indigenous and third-languages, we simply wish the Commission to be aware that these proposed changes are beyond the capacity of over-the-air radio and television broadcasters, as well as being outside the scope of the CRTC's authority given its position in the overall alerting system as the regulator of last mile distributors (LMDs).
3. On this latter point, we agree with the Canadian Telecommunications Association (CTA), who very clearly laid out the 'chain' of stakeholders involved in the provision of alerts to Canadians, noting that: "*Content of the message, the languages used, the format of the message and the timing/destination of the alert, are solely under the purview of the alert issuer.*"
4. As also noted by TELUS and a few other parties, LMDs are effectively "dumb pipes" and simply relay alert messages as provided by designated alert issuers. LMDs cannot be required to provide additional languages, including ASL and LSQ. These sorts of improvements will require changes across the entire National Public Alerting System (NPAS) at every point in the chain identified by the CTA.

5. Importantly, we note that the federal government recently announced significant new funding in the Fall Budget for improvements to the NPAS.<sup>1</sup> A portion of this new funding should be directed to the sorts of improvements sought by accessibility organizations and those seeking additional languages.
6. As we stated in our reply comments, the CRTC is to be commended for collecting such a rich record, particularly in relation to improving the accessibility of alerts for Canadians with disabilities. We recommend that the Commission share this information with Public Safety Canada as they consider improvements to the NPAS. We also support Pelmorex's proposals for some kind of accessibility-focused consultative committee to provide recommendations and oversight of accessibility improvements to the system.
7. In conclusion, we respectfully urge the Commission to be both practical and realistic as it considers improvements to the NPAS, keeping in mind the following key points:
  - Viewers and listeners see alerts as a disruption to their radio and television programming. The risk of viewer/listener fatigue and tune-out is real. Radio and television broadcasters are already fighting an uphill battle against declining audiences and are acutely aware of any interference that could trigger further erosion. Therefore, alerts must remain short – multiple languages would be disruptive, particularly on radio.
  - Radio and television stations are but one part of a much larger alerting system – they are not the only way people receive alerts. Of particular note, alerts are also provided through mobile devices which are almost ubiquitous and are certainly more adaptable. As noted by several intervenors, people can receive and review the alerts – or not – on their mobile devices, whereas on television and radio, alerts interrupt their viewing/listening experience. Furthermore, radio and television broadcasters can also support emergencies situations in other ways, including through their news and information programming.
  - The Commission must be cognizant of the impact of any new obligations on radio and television stations that are already facing significant financial challenges. Any increase to their regulatory or administrative burden risks increased cutbacks in service to audiences, or worse, closures. Respectfully, we do not believe private broadcasting companies should assume the financial responsibility for what is a government-driven initiative.
8. Accordingly, the Commission should thus consider flexible and adaptable approaches to public alerting requirements that align with the unique business models of specific types of last-mile distributors.

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<sup>1</sup> <https://budget.canada.ca/2025/report-rapport/pdf/budget-2025.pdf>, page 194.

9. In particular, keeping in mind that alerts are provided by multiple types of 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 the alert only in the language for which they are licensed. In this way, alerts will be provided in the language chosen by viewers/listeners and disruption will be minimized. This is a more audience-friendly approach and aligns with obligations under the *Official Languages Act*.
10. We thank you for the opportunity to share these final comments.

Yours sincerely,

*[Original signed by]*

Kevin Desjardins

President | Canadian Association of Broadcasters

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