



Sent via GC Key

25 May 2026

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 responses to the CRTC's Request for Information regarding *Improving the public alerting system*, Telecom and Broadcasting Notice of Consultation CRTC 2025-180

1. As the national voice of small, medium and large Canadian privately-owned and controlled radio and television broadcasters, the Canadian Association of Broadcasters (CAB) is pleased to provide reply comments with respect to the responses to the requests for information issued by Commission staff on 23 April 2026 in the above-noted proceeding.
2. CAB and its members fully support the objectives of the National Public Alerting System (NPAS) and recognize the critical public safety importance of ensuring that all Canadians receive timely and effective emergency alerts.
3. CAB further acknowledges the importance of improving accessibility and inclusiveness within the public alerting ecosystem, including the objectives of enhancing support for Indigenous languages, accessibility measures, and multilingual emergency communications.
4. At the same time, CAB submits that the record of this proceeding also demonstrates that significant technical, operational, governance, and financial considerations remain unresolved. The record also demonstrates broad recognition that broadcasters and other last-mile distributors (LMDs) do not control alert origination, translation, language selection, or message composition.

5. Finally, the record confirms that meaningful modernization of multilingual and accessible alerting will require coordinated planning and action among multiple stakeholders, including:

- Public Safety Canada;
- Authorized government agencies (AGAs) including provincial and territorial emergency management organizations (EMOs);
- Pelmorex as the National Alert Aggregation and Dissemination (NAAD) system operator;
- device, operating system and equipment manufacturers;
- accessibility organizations;
- Indigenous organizations and language authorities; and
- telecommunications service providers and broadcasters.

The record demonstrates broad support for accessibility objectives, but limited consensus regarding responsibility

6. The record demonstrates broad support for improving accessibility and inclusiveness within the NPAS. Indeed, the CAB acknowledges and appreciates the important contributions made by accessibility organizations, including the Canada Deaf Grassroots Movement (CDGM), the Deaf Wireless Canada Consultative Committee (DWCC), and the Neil Squire Society, as well as other public-interest intervenors. Their submissions highlight important barriers affecting Deaf, DeafBlind, and hard-of-hearing Canadians, blind and low-vision Canadians, and other populations facing accessibility barriers during emergencies.

7. However, while many parties support enhanced accessibility outcomes, there is substantial disagreement regarding how these outcomes should be achieved and who must take responsibility. Similar questions arise with respect to Indigenous language alerting and alerting in languages other than English and French.

8. In this context, it is important to recognize, as consistently emphasized throughout the record by broadcasters, broadcast distribution undertakings and telecommunications carriers, that LMDs do not originate alerts, do not determine alert language, do not perform translations, and do not control the content or structure of emergency messages.

9. This distinction is fundamental.

10. Broadcasters function as distribution points within the NPAS ecosystem. They receive and distribute alerts created and authorized elsewhere in the system. As numerous parties noted, including Corus, Québecor, Rogers, BCE, TELUS, and CTA, LMDs cannot reasonably be expected to assume operational or legal responsibility for multilingual translation, Indigenous-language validation, accessible content generation, or emergency message composition. These responsibilities properly reside with AGAs, EMOs, Public Safety Canada and the NAAD system operator.

The record demonstrates significant technical and operational constraints

11. Multiple parties throughout the proceeding identified substantial technical limitations associated with implementing multilingual and accessibility-related changes across the NPAS ecosystem. At the broadcaster end, these constraints include character-set limitations and syllabic rendering issues, text-to-speech (TTS) limitations, and legacy encoder/decoder infrastructure and firmware limitations. Broadcasters specifically identified significant constraints involving their equipment, including character generators, text crawl systems, and audio processing infrastructure.
12. Corus and other broadcasters noted that much existing equipment was designed primarily around English and French operational assumptions and may not support Indigenous-language syllabics or advanced multilingual rendering without significant replacement or modification.
13. The record also demonstrates that vendor ecosystems are limited and certain manufacturers are no longer actively developing major feature upgrades. As a result, implementation timelines (and costs) remain highly uncertain. Accordingly, the Commission should avoid imposing obligations that exceed the actual technical capabilities of existing infrastructure or create operational uncertainty. Obligations that require widespread capital replacement must also consider the possibility of corresponding funding support.
14. Finally, as parties such as First Mile Connectivity Consortium (FMCC), Alberta Emergency Alert, Rogers, and TELUS noted, meaningful multilingual implementation requires system-wide changes to ensure end-to-end compatibility as well as thorough testing. These issues are broader, system-wide modernization questions that extend far beyond the role or operational authority of broadcasters.

Public Safety Canada would appear to be the appropriate lead for system modernization and accessibility coordination

15. The record increasingly points toward Public Safety Canada (PSC) as the appropriate lead entity for coordinating accessibility modernization and broader NPAS renewal. Multiple parties, including CTA and telecommunications providers, emphasized that PSC already leads federal emergency management coordination and administers the Common Look and Feel (“CLF”) guidance. Further, Budget 2025 earmarked dedicated federal funding for NPAS modernization. CAB agrees that Public Safety Canada is better positioned than individual LMDs to coordinate improvements with respect to accessibility and Indigenous and third-language alerting.
16. Multilingual and accessibility modernization also necessarily requires coordination among federal, provincial, territorial, and Indigenous stakeholders with emergency management expertise. These are not matters that can reasonably be addressed through broadcaster-specific obligations.

Existing governance structures should be utilized before creating new regulatory bodies

17. Several parties proposed the creation of additional governance or oversight structures to address multilingual alerting and accessibility issues.
18. CAB acknowledges the importance of ensuring meaningful stakeholder participation, transparency, and accessibility expertise. However, the record also demonstrates that multiple governance and technical coordination structures already exist, including SOREM, PAWG, ATWG and the NAAD Governance Council (as well as the possibility of CISC-related technical working groups).
19. CAB submits that these existing structures should be utilized and strengthened where appropriate before considering the creation of entirely new regulatory forums. At minimum, any future working structures examining accessibility or multilingual implementation should include broadcasters, telecommunications providers, emergency management organizations, accessibility organizations, Indigenous organizations and language authorities, Public Safety Canada, Pelmorex, and relevant technical experts, including equipment manufacturers.

Indigenous-language alerting development will require community-based engagement

20. CAB supports efforts to improve emergency communications for Indigenous-language communities. However, the record clearly demonstrates that Indigenous-language implementation is dependent on direct community engagement. FMCC and other parties emphasized, for example, that neighbouring communities may use different dialects, different writing systems may apply, and regional assumptions may not be appropriate.
21. The implementation of meaningful Indigenous-language alerting will require direct Indigenous engagement and language validation through community partnerships and region-specific implementation (and testing) approaches, led collaboratively with Indigenous communities.

Alert fatigue and message effectiveness remain important considerations

22. Multiple parties throughout the record raised concerns regarding alert fatigue and audience disengagement, particularly in the case of excessively lengthy messages or repetitive multilingual sequences. Emergency alert effectiveness depends not only on inclusiveness, but also on clarity, immediacy, comprehensibility, audience responsiveness and public confidence.
23. The Commission should therefore ensure that any future multilingual implementation preserves urgency, minimizes confusion, and avoids unnecessarily lengthy or repetitive alert structures. Layered communication approaches may provide more effective solutions in many circumstances.

24. As discussed by multiple parties, including Neil Squire Society, layered approaches may include accessible websites and apps that provide maps, multimedia content, ASL/LSQ templates/repositories and supplementary public information. Supplementary accessibility tools, websites, apps and multimedia repositories may in many cases represent more flexible and effective accessibility solutions than attempting to embed all accessibility functionality directly within primary broadcast alert messages.

Financial sustainability and proportionality must remain central considerations

25. The record demonstrates that many proposed changes could involve substantial infrastructure upgrades, firmware replacement, software development, equipment replacement, as well as operational implementation costs and resource allocation at a time when broadcasters across Canada continue to operate under significant financial pressures.
26. The City of Calgary submitted that it is actively experimenting with ATSC 3.0 digital television broadcast technology, which has features that may enhance multilingual and accessibility functionality. However, whether or not Canada may adopt the experimental ATSC 3.0 digital television standard in future is outside the scope of this proceeding. The technology is very much in its nascent stages, and non-existent in Canada other than the experimentation by City of Calgary and Humber Polytechnic. Not only would every television station need to convert its transmitters to the new technology, but also every consumer would need to purchase new TV sets and adapters. The change would also have a major impact on equipment changes for BDUs.
27. Any future obligations imposed on broadcasters must remain proportionate and technically achievable. The Commission should avoid imposing obligations that create substantial new financial burdens on broadcasters. Indeed, any modernization proposals must also consider the possibility of funding to support technical upgrades.

Conclusion

28. While the CAB fully supports the broad objectives of improving accessibility and inclusiveness within Canada's public alerting ecosystem, the record demonstrates that there are financial, technical and operational limitations, particularly at the level of LMDs. Any future regulatory approach should recognize the limited operational role of broadcasters as LMDs, and in particular, that broadcasters do not control alert origination, language selection, or accessibility content creation.
29. Further, the Commission must keep in mind that operational responsibilities are distributed across multiple entities requiring a coordinated system-wide modernization effort, likely best led by Public Safety Canada, but including participation by all affected parties.

30. Finally, CAB submits that any future regulatory approach must remain technically realistic, operationally sustainable and proportionate, and appropriately scoped to the actual role and capabilities of broadcasters within the NPAS ecosystem.

31. All of which is respectfully submitted.

Yours 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

*** End of document ***