



T & BNC 2025-180

Improving the Public Alerting System

CCSA Submission

Final Submission- Building Forward.

January 27, 2026

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

Dear Mr Morin:

**Re: Telecommunications and Broadcasting Notice of Consultation 2025-180:
Improving the public alerting system.**

1. The CCSA is a national organization representing more than 100 small independent broadcasting distribution companies and ISPs that provide TV, internet, and telecommunications services to more than half a million Canadian residents and businesses in urban and rural communities, from coast to coast to coast.

Summary

2. After review of the Notice of Consultation and submissions from other intervenors, CCSA submits four key positions in its final submission in support of submissions made by other parties.
 - The system would benefit from modernization.
 - A national app is the best way forward.
 - 5G/LTE and not 3G should be mandated.
 - Additional support for First Nations radio services should be strongly considered.
3. CCSA agrees with many of the points put forward by Rogers in its last submission to this process.¹ While CCSA does not agree with all of the points expressed (as discussed more below), the arguments were strongly reasoned and compelling.

Building Forward

4. CCSA recognizes comments from many groups including ARCC, DHHC, DWCC, FMCC, etc., that commonly agree the system is not working for all Canadians in an optimal manner. These arguments were summarized well by DWCC in its December 19 submission in its E2:

“The evidence demonstrates that the National Public Alerting System (NPAS), as currently designed, **does not meet the emergency communication needs** of Deaf,

¹ December 19 submission.

DeafBlind, Hard-of-Hearing (DHH), Indigenous, Francophone, rural, senior, newcomer, and disabled Canadians.”²

5. CCSA agrees with DWCC that modernization is required. While DWCC’s December 19, 2025 submission lays out its key objectives of modernization in paragraph 311, CCSA does not uniformly agree with those measures. We support points 1, 2, 4, and 6, with other points being advantageous in the short term, but likely becoming less significant as technology advances.
6. CCSA would instead argue that simplicity, cost-effectiveness, and ease of use should ultimately be considered primary concerns. To this end, CCSA supports Rogers’ proposal for a national app.
7. FRPC’s submission correctly argues that the private sector should not be burdened with responsibilities that rest with the federal government.³ CCSA is uncertain if the Commission or another government body should directly lead such initiatives, but agree with the core point that the government should be responsible for replacing the current alerting system if it no longer meets the needs of Canadians.⁴
8. CCSA is confident wireless alerting is the best path forward for Canadians, and a new national app would offer many advantages. While television may continue to play a part in the distribution of alerts for a time, it has and will continue to have reduced efficacy compared to wireless and radio.
9. Some intervenors sought options for ‘opt-outs’. Opt-outs were not raised in the call for comments, and should be treated as an ancillary concern. CCSA only supports opt-outs if there is a national app. A national wireless app would be able to ensure such opt-outs were managed appropriately and uniformly. It could also ensure that linguistic requirements and the needs of disabled Canadians are easily and efficiently addressed. This resolves most of the concerns that the Commission has received in this process.
10. Telus argues that the private sector already addresses the app needs of Canadians. While we understand that perspective, CCSA would suggest that the current private system is not meeting the needs of Canadians sufficiently.⁵ The federal government has a department

² Deaf Wireless Canada Committee submission to 2025-180 dated December 19, 2025.

³ FRPC submission to 2025-180 dated December 19, 2025, paragraph 20.

⁴ This matter is discussed in the same paragraph as footnote 3. CCSA is aware that Public Safety currently has an RFP out to support the NPAS, so it is unsure if jurisdiction should fall under the governmental departments of public safety or heritage.

⁵ As evidenced by multiple submissions from different groups.

dedicated to public safety. It makes sense for the government to modernize the National Public Alerting System.

- 11 The current system, as outlined on the Public Safety website⁶ has four components: Alert Issuer, Alert Aggregator (and disseminator), Alert Distributor, and Public (recipients). A national app would streamline the whole process substantially while resolving many of the existing flaws.
- 12 The remaining (existing flaws) can be broken down into two categories: 3G vs 5G/LTE, and indigenous language concerns.
- 13 After reviewing submissions from other intervenors, CCSA supports industry intervenors who argue that focusing any improvements on 5G/LTE, and not 3G, is the better path forward. The Commission is trying to build a system for the future, so focusing on older technology that is already being phased out is the wrong approach. We would urge the Commission to future-proof policy as opposed to looking backwards.
- 14 Additionally, CCSA agrees with Rogers' submission that technology gaps for signal strength are not symptomatic of a public alerting gap, but a demonstration of insufficient connectivity. This is a distinct problem, and one that needs a separate (and urgent) solution.
- 15 Finally, CCSA appreciates, but respectfully disagrees with Rogers' position regarding the ARCC (et. al.) submission regarding First Nations radio services acting as a linguistic intermediary for local communities. While CCSA agrees with Rogers that more information is probably required before the Commission or government can actively implement the proposal, the core idea is good. It should be supported, refined, and then re-evaluated for implementation. If the government moves ahead with a new app, having local First Nations radio stations providing translation could be a very beneficial partnership to remedy regional linguistic barriers.
- 16 CCSA thanks the Commission for its consideration in this matter.

Sincerely,



John P. Roman
Director Legal & Regulatory Affairs
Canadian Communications Systems Alliance

⁶ <https://www.publicsafety.gc.ca/cnt/mrgnc-mngmnt/mrgnc-prprdss/ntnl-pblc-lrtng-sstm-en.aspx>