

Notice: TDPB-001-2017

2017 09 18

To: Mr. Michael Wernick,  
Clerk of the Privy Council and Secretary to the Cabinet,  
Office of the Prime Minister and the Privy Council,  
80 Wellington Street,  
Ottawa, Ontario  
K1A 0A3

Via email: [info@pco-bcp.gc.ca](mailto:info@pco-bcp.gc.ca)

Subject: **Canada Gazette Part 1 Application – Petition to the Governor in Council Concerning Telecom Regulatory Policy CRTC 2017-91, Implementation of the National Public Alerting System by wireless service providers to protect Canadians (TDPB-001-2017)**

Dear Mr. Wernick,

1. We are one of Canada's world-leading LTE network wireless companies.
2. We have been active in the forefront of wireless public alerting with internal testing and development activities for well over a decade.
3. It should be noted, that we actively participated in the development of the Canadian Wireless Telecommunications Associations submission on this matter and agree with the position therein.
4. We believe that there is no merit to Avis de Recherche's (ADR) assertions as presented in their petition.

**Participation in Wireless Public Alerting (WPA) Proceedings**

5. We are of the view, that interested parties have had ample opportunity to provide input and become actively involved in various processes related to WPA.

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6. Public Safety Canada began collaborating on a pilot project to examine the various capabilities of WPA technologies back in 2014. In 2016, two major tests were conducted by interested parties using two different technologies, namely cell broadcast (CB) and location-based short message service.

7. In 2016, the Commission issued consultation Telecom Notice of Consultation 2016-115, *Participation by wireless service providers in the National Public Alerting System* (TNC 2016-115). This was a general call for comments from interested parties to provide input at to whether to require wireless service providers to participate in Canada's National Public Alerting System.

8. In response to the TNC 2016-115, the Commission received input from a wide ranging number of individuals, cities, manufacturers, provincial emergency organization and wireless carriers from across the country. To our knowledge, none of these entities were specifically invited to participate in the process.

9. Based on the input received on the TNC 2016-115, the Commission released the Telecom Regulatory Policy CRTC 2017-91, *Implementation of the National Public Alerting System by wireless service providers to protect Canadians* (TNC 2017-91).

10. Since release of the decision, we along with many other stakeholders and industry groups have been actively involved in preparations for the April 2018 launch of WPA services. The preparations are well underway and given the amount of time and effort that has been expended on this initiative, it does not appear reasonable to suddenly stop this work and further delay the introduction of WPA services to Canadians.

### Cell Broadcast Technology

11. It was clear from the submissions to the TNC 2016-155 that CB was the best technology option for wireless public alerting in Canada. This is because the cell broadcast technology includes a number of key advantages over other technologies. These include:

- Use of a control channel of wireless networks for the immediate release of Broadcast Immediate alert messages irrespective of network traffic;
- High probability of immediate alert delivery (subject to network coverage and device readiness); and
- CB is able to target a specific area with high accuracy and only handsets in the broadcast area will receive alerts.

12. We are of the view that the system proposed by ADR cannot produce the same results as CB.

### Conclusion

13. Upon the TRP 2017-91, we along with the entire wireless industry and various partners/stakeholders committed to implementing a cell broadcast-based WPA system on Canada's leading LTE networks by 18 April 2018. This has led to a considerable amount of time and effort in making the required preparations to have the service in place and launched as required by the Commission.

14. We respectfully submit that the TRP 2017-91 must stand and that the Governor in Council deny ADR's request.

Yours truly,

*[ Original signed by S. Bertuzzo ]*

**Serge Bertuzzo**  
Director, Regulatory Affairs

c.c.: Pamela Miller, ISED

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