



September 18, 2017

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

Dear Mr. Wernick,

Re: Canada Gazette Part 1 (published on August 19, 2017): Notice No. TDPB-001-2017 – Petition to the Governor in Council Concerning Telecom Regulatory Policy CRTC 2017-91 (TDPB-001-2017).

1. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents wireless service providers (WSPs) as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators, and business-to-business service providers.
2. The wireless industry is committed to enabling and facilitating the development of Wireless Public Alerting (WPA) in Canada. The ubiquity and quality of wireless services over Canada's world-leading LTE networks transforms a wireless device to an incomparable public safety tool for consumers, Federal and Provincial agencies, and first responders.
3. CWTA believes there is no merit to Avis de Recherche's (ADR) assertions as presented in their petition.

Participation in various proceedings

4. There have been numerous opportunities for interested and impacted parties to provide input and involve themselves in the various processes starting as early as 2014 when Public Safety Canada began collaborating on a pilot project to examine wireless public alerting.
5. In 2015 Bruce Power filed a Part 1 Application in which it asked that WSPs be ordered to immediately implement WPA using existing technology and solutions. This proceeding allowed for interested and impacted parties to provide interventions.
6. In Telecom Decision CRTC 2015-482, in which the Commission denied the application, the Commission noted "the general expression of support by interveners in the present proceeding regarding the implementation of a WPA service. Given the issues raised in this proceeding, a more fulsome public process on the need for a WPA service that makes use of mobile wireless networks and includes all WSPs is appropriate. Accordingly, the Commission intends to launch a broad public consultation before the end of fiscal year 2015-2016, accelerating the timelines indicated in the *CRTC Three-Year Plan 2015-2018*."

7. In March of 2016, Telecom Notice of Consultation 2016-115 was issued and the Commission called for comments regarding participation by WSPs in the National Public Alerting System. Public consultations are announced via many different mechanisms, including press releases, and by posting the notices on the CRTC website and RSS feed. Service providers, technology developers, and public safety agencies active in the telecommunications sector are each responsible for their own monitoring of these notices, and their participation in proceedings of interest. In total, 219 interested parties and individuals participated in this important proceeding.
8. In addition, in the same year, tests of two different technologies (Cell Broadcast, and location-based SMS) occurred in Ontario. Both of these informed the discussion concerning WPA.
9. Since the release of Telecom Regulatory Policy CRTC 2017-91, a substantial amount of work has taken place within multiple stakeholder and industry groups in order to ensure a successful launch of WPA. The work occurs on calls open to organizations active in the WPA field, and documents are publicly available. Moreover, a significant amount of resources have also been committed to ensure WSPs meet all required specifications.
10. This activity is underway with a view to implementing WPA service within the tight timeframe established by the CRTC, so that Canadians can begin benefiting from these services in the near future. So, taking into account these efforts and the ongoing commitment of all involved stakeholders, CWTA does not believe it would be reasonable to expect this work to stop.

Use of Cell Broadcast

11. Reopening the proceeding that resulted in Telecom Regulatory Policy CRTC 2017-91 is unnecessary as the CRTC would inevitably reach the same determinations as those set out in the decision.
12. Specifically, Cell Broadcast is the best option for WPA in Canada because a Cell Broadcast-based system facilitates a high probability of immediate alert delivery (subject to network coverage and device readiness). Cell Broadcast uses a little-used control channel of wireless networks that will not be inundated with additional traffic during an emergency and, therefore, safeguards that Broadcast Immediate (BI) alert messages are not delayed due to network traffic. In addition, Cell Broadcast is the technology most reliably able to reach all devices within a relevant geographic area, and to ensure the message satisfies the necessary look and feel standards so that Canadians can immediately identify alerts as valid and respond accordingly.
13. The system proposed by ADR simply cannot produce the same results. Reopening the proceeding to consider ADR'S specific solution would result in the same determinations already set out in Telecom Regulatory Policy 2017-91, but the implementation would be delayed.

In closing

14. The wireless industry, and impacted partners and stakeholders, are aligned and committed to implementing a Cell Broadcast-based WPA system on Canada's world-leading LTE networks.

15. CWTA respectfully submits that Telecom Regulatory Policy CRTC 2017-91 need stand, and that the Governor in Council deny ADR's request on the basis of there being no merit in their assertions, and no benefit to Canadians.

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- c.c. Pamela Miller, Director General, Telecommunications and Digital Policy Branch, Innovation, Science and Economic Development Canada (ic.telecomsubmission-soumissiontelecom.ic@canada.ca)