

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).**

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1. Pelmorex Weather Networks (Television) Inc., is the broadcasting licensee of the programming services The Weather Network and MétéoMédia, Canada's leading weather information services in both official languages.
2. Pelmorex has also operated and funded the National Alerting Aggregation and Dissemination System since 2010. The NAAD System is the backbone infrastructure that validates and distributes emergency alert messages to TV and radio broadcasters as well as cable and satellite distributors across Canada within seconds of being issued by emergency management officials. As per Telecom Regulatory Policy CRTC 2017-91, the NAAD System will also support the seamless delivery of threat-to-life messages directly to smartphones by April 2018.
3. Pelmorex is pleased to comment on the above-noted petition to the Governor in Council. We have carefully reviewed the comments filed by the Canadian Wireless Telecommunications Association (CWTA) and we support its conclusions that:
  - There has been sufficient opportunity over the past three years (including multiple CRTC proceedings) for impacted and interested parties to involve themselves in the process to regulate the implementation of a national public alerting system by wireless service providers; and
  - The record of past proceedings clearly supports the Commission's determination to mandate a Cell Broadcast-based system for Wireless Public Alerting (WPA) over all other technical options.
4. Since the Commission issued Telecom Regulatory Policy CRTC 2017-91, Pelmorex towards connecting wireless service providers to the NAAD System as well as identifying final technical amendments that need to occur to ensure WPA is successfully enabled by April 2018. As such, and in light of the above conclusions, we also support the CWTA's

recommendation that Telecom Regulatory Policy CRTC 2017-91 stand and that the Governor in Council deny the petition in its entirety.

5. We appreciate the opportunity to comment on this proceeding.

Yours truly,

A handwritten signature in black ink, appearing to be 'Kurt Eby', written in a cursive style.

Kurt Eby  
Director, Regulatory & Government Relations  
Pelmorex Weather Networks (Television) Inc.

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

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