

July 21, 2022

The Honourable Marc Garneau
M.P., Notre-Dame-de-Grâce—Westmount
House of Commons
Ottawa ON K1A 0A6

Mr. Garneau,

Re: Background on the management of National Alert Aggregation and Dissemination (NAAD) System accounts by Pelmorex; and the possibility of managing accounts directly for Indigenous communities.

Pelmorex Weather Networks (Television) Inc. is the broadcasting licensee of The Weather Network and MétéoMédia, which are authorized by the Canadian Radio-television and Telecommunications Commission (“CRTC”) to provide weather and environmental news and information programming. As part of its licensed undertaking Pelmorex built and operates the National Alert Aggregation and Dissemination (“NAAD”) System which authenticates emergency alerts issued by public officials and disseminates these messages to broadcasters (radio and television), cable and satellite television distributors, wireless service providers, and other parties for dissemination to the public.

The NAAD System

The NAAD System has been the technical backbone, and is the foundational component, of Canada's national public alerting system, also branded as Alert Ready, since it was built and launched by Pelmorex in 2010. Alert Ready consists of: the authorized government issuers (e.g. Emergency Management Organizations (EMOs); Police; Environment and Climate Change Canada (“ECCC”), etc.) who craft and send emergency alerts; the NAAD System, which validates and authenticates alerts in a matter of seconds; and last mile distributors such as TV, radio and wireless service providers that distribute alerts to Canadians in the prescribed area. All three components combine to make Alert Ready a powerful and much-used life saving tool.

The NAAD System was uniquely developed in direct collaboration with Canada’s EMOs to provide them with the ability to notify Canadians of, most importantly, imminent threats to life or property. It also allows alert issuers to disseminate advisories, watches or warnings for important but non-life-threatening events. Such alerts do not automatically activate on a wireless device or intrude on a radio or television broadcast, but are made available through a variety of means including third-party apps, the media and RSS feeds.

In total, Canadian alert issuers used Alert Ready to issue 194 broadcast immediate (BI) messages in 2021 – 19 of which were for public awareness tests and 175 to warn Canadians of an immediate threat to life. An additional 65,630 non-BI messages were validated by the NAAD System in 2021 – nearly 180 per day. The vast majority of these messages were weather watches, warnings and advisories issued by ECCC, but the non-BI functionality was also used by EMOs to send important information such as boil water advisories, 9-1-1 service outages and flood watches.

Pelmorex's Role

Pelmorex's official roles within Alert Ready are:

1. The technical vendor providing and operating the NAAD System, which includes the user interface used by authorized alert issuers to craft and send public alerts; and
2. The NAAD System account access administrator.

As the technical operator of the NAAD System, Pelmorex undertakes the technical development and evolution of the system primarily at the direction of Canada's emergency management officials, and with advice from Canada's broadcasters and wireless service providers.

More relevant to this brief, Pelmorex also manages NAAD System master access agreements. In this role, Pelmorex will conclude a NAAD System access agreement with any agency that has clear and direct jurisdiction over a public safety or emergency management function and requests access. Presently, all provincial and territorial (PT) EMOs, and ECCC have NAAD System access agreements. PT EMOs are responsible for how they each run their public alerting program, including whether they provide access to agencies (police, fire, municipalities, etc.) within their jurisdiction, if they centralize alert issuance through the EMO, or if they take a hybrid approach, whereby some agencies have direct access and others issue alerts via the EMO.

It is important to clarify that "direct access" simply means an agency has an account, or multiple user accounts, to log in to the NAAD System and issue an alert using the alert interface, and is trained to do so. System use can be restricted by an administrator in terms of:

- **What events a user can issue an alert for** – for example, police agencies are typically restricted to issuing AMBER alerts or alerts for a dangerous person/active shooter or policing situation. As well, users could be limited to issuing non-BI alerts only as a means to provide important, but no imminently-needed, information to the public; and
- **What geographic area a user can alert** – provinces and territories are restricted to alerting within their own boundaries and may, when adding an access account for a municipality, restrict alerting to the municipal boundaries. By comparison, ECCC is authorized to issue a tornado or severe thunderstorm alert anywhere in Canada.

Training is also the responsibility of the agency that has an access agreement with Pelmorex. However, Pelmorex does provide technical training on request.

The reason behind the access model is straightforward. Public safety is largely a provincial and territorial jurisdiction within Canada, including policing, where the majority of police forces are contracted by provinces, or by municipalities which also fall under provincial jurisdiction. Pelmorex simply cannot supersede a provincial or territorial jurisdiction and grant NAAD System access to any agency under the authority of a province or territory. This is also for good reason. Provinces, territories and the agencies they represent are best aware of their own specific circumstances and can best determine which user model works for them.

Currently, there are 540 NAAD System user accounts representing 78 different agencies, including 11 police forces. Alberta additionally provides access to eight police forces, which issue alerts using the Alberta Emergency Alert user interface, which are then distributed to wireless service providers through the NAAD System. Alberta has announced it will be transitioning to the NAAD System in 2023 and these agencies will at that time also use the NAAD System user interface to craft and issue alerts.

NAAD System Access for Indigenous Communities

Presently, Indigenous communities would need to access the NAAD System through the Emergency Management Organization of the province or territory where their community is located. Pelmorex, however, has recently discussed whether Indigenous communities could, or should be authorized, to access the NAAD System directly through Pelmorex.

As a first step, Pelmorex is prepared to provide access accounts to Indigenous communities if we were to receive the appropriate direction or authorization to do so. As a rule, Pelmorex strongly supports the use of Alert Ready. Within our role we can seek to improve technical function to increase use and effectiveness of the system, and in this instance we believe that we could take on additional administrative responsibilities that may eliminate an administrative burden on our provincial and territorial partners and thereby allow more Indigenous communities to be able to use Alert Ready to warn citizens of immediate or less severe threats. This is also consistent with our broader commitment to improve and increase our service to Indigenous people and communities and to find ways within our power to contribute to reconciliation.

We are also aware that some Indigenous communities have contracted with third parties and are paying to be able to provide opt-in or app-based alerting services. Use of Alert Ready is free and does not require citizens to download an app or opt in to receive alerts. The alerts are therefore more powerful and more effective. Having all alerts issued through the single, national system also reduces confusion that can be caused by having multiple alerting services operating at the same time.

Pelmorex is uncertain about what type of level of authorization would be needed to enable it to provide NAAD System access to Indigenous communities, which is why we are looking to explore this possibility further with appropriate authorities. It is important that jurisdictions be respected and that any effort to further this opportunity is completely transparent to all stakeholders. It is also important to note that currently many public safety agencies prefer to issue emergency alerts via their Provincial or Territorial EMO due to their own capabilities or resources. It is possible that this may also be the case for many

Indigenous Communities and that no one-size-fits-all solution should be expected. Pelmorex is fully prepared to support whatever model, or models, that may be adopted in whatever way we can.

Under the appropriate authority Pelmorex could provide direct NAAD System access to Indigenous communities and manage user accounts. We could also provide technical training on how issue an emergency alert and share some materials that we have developed collaboratively with our Federal, Provincial and Territorial partners on what content is typically included in an emergency alert (e.g. name of alerting authority, description of event, recommended action, etc.). However, Pelmorex is not a public safety or emergency management agency and therefore current authorized alert issuers would be better placed to provide additional instruction and guidelines to new users on when and how to use Alert Ready for certain situations.

Conclusion

Pelmorex developed the NAAD System 12 years ago to ensure that Canadians could be warned of imminent threats to life. Ongoing technical development, regulation and cooperation have ensured that today millions of people can, and are, warned immediately of life threatening situations, and we continue to pursue, within our role, technical and administrative opportunities to enable the delivery of more life saving alerts. We believe that there is a jurisdictional and public safety case for better enabling Indigenous communities to directly access the NAAD System and be able to issue alerts to their own citizens through Alert Ready. Pelmorex is prepared to provide NAAD System access to Indigenous communities and manage user accounts if we were to receive the appropriate direction and authorization to do so.

We appreciate the opportunity to provide this information and look forward to discussing this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kurt Eby', with a stylized flourish at the end.

Kurt Eby
Director, Regulatory, Government and Affiliate Relations
Pelmorex Weather Networks