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November 11, 2017

Mr. Chris Seidl
Secretary General
Canadian Radio-television and Telecommunications Commission

Dear Mr. Seidl,

Alberta is pleased to be able to support the Pelmorex Weather Networks application (2017-0586-5) for the license renewal of The Weather Network/MétéoMédia's as per Broadcast Notice of Consultation CRTC 2017-365, "Application for the renewal of services with mandatory distribution of the basic service pursuant to Section 9(1)(h) of the *Broadcast Act*". It is recognized that mandatory carriage is a significant financial boon to Pelmorex but that is balanced against the substantial public benefit that that is provided by this license renewal.

Alberta is very interested in this application as it directly impacts public safety for all Canadians. Pelmorex has been responsible for the national public alerting system (National Alert Aggregation and Dissemination (NAAD) System) since its inception. During the previous licensing term, the NAAD System has proven to be a reliable and vital component of the national emergency management strategy. In this respect, the NAAD System meets the test of being a service in the public interest as per the Commission's "Criteria for assessing applications for mandatory distribution of a digital basic service", Broadcast Regulatory Policy CRTC 2010-629.

The Alberta Emergency Alert (AEA) system is finalizing its connection into the NAAD System as a trusted feed partner in order to ensure the widest possible distribution of alert messages and to leverage the NAAD System wireless public alerting (WPA) capabilities. The integration of AEA and the NAAD System further extends the reach of alert messages while minimizing costs to distributors, broadcasters and public inconvenience. This unity of public safety effort improves emergency management organizations and all other alerting stakeholders' ability to assist Canadians.

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42 The key efforts made by Pelmorex to enhance the NAAD system are listed in Appendix 1:
43 Supplementary Brief (paragraph 72 - 84) and Alberta has been pleased to participate in many of
44 those accomplishments through the Pelmorex NAAD System Governance Council and working
45 group/committee membership. The introduction of text-to-speech and the training
46 environment mark the maturity of the NAAD System as a modern alerting service. In coming
47 months, the transition to a cloud computing environment, user interface improvements, an
48 exercise environment, centralized message storage and WPA make the NAAD System a highly
49 available, trusted part of the overall national public alerting system.
50

51 The current Governance Council structure is not without its challenges as the Council role is act
52 as “advisor” to Pelmorex on NAAD System development. This is a reality of the national alerting
53 system being the responsibility of a for-profit organization. Alberta would therefore
54 recommend that there be increased financial transparency into NAAD System operations so the
55 Governance Council can be better advisors. At present there is no visibility on funds generated
56 by Pelmorex’s 9(1)(h) status and the cost to operate the NAAD System. Having that accounting
57 would enable the Governance Council to better understand the cost and effort associated with
58 its system change requests. This in turn will enable the Council to prioritize these requests.
59

60 Alberta recognizes that Pelmorex is a private company and financial scrutiny is not within its
61 purview; therefore, this request is specifically limited to revenue generated by the mandatory
62 carriage provisions of the Pelmorex license and costs associated with NAAD System operation.
63

64 The NAAD System is a mission-critical component of the Canadian emergency management
65 system. Pelmorex is currently a Canadian controlled company. However, its recent transition to
66 focusing on data services may raise its profile as an acquisition target. Putting Canada’s national
67 alerting system under the control of an American or international corporation may not be in the
68 public’s best interests. Similarly, Pelmorex could create other companies and transition
69 telecommunications services as part of their business strategy. Therefore, the license renewal
70 should contain provisions so that this service will continue should Pelmorex decide to no longer
71 support or operate the NAAD System. To preserve public safety, the license conditions should
72 also include a transition period to ensure continuity of the NAAD System if Pelmorex chooses to
73 move to another business model.
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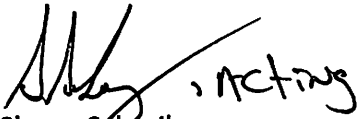
75 The Pelmorex application is for seven years, which is excessive given the rate of technological
76 change and the license renewal’s revenue guarantees. It is suggested that the license
77 application should include a four-year term with a review provision and a subsequent option for
78 another three years. This would balance the needs of Pelmorex to have a longer-term business
79 opportunity with the benefits of having a pre-scheduled service review, during which public
80 alerting stakeholders can provide feedback to the Commission.

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Thank you for opportunity to comment on Pelmorex's license application. I do not want to appear at the public hearing.

Sincerely,

A handwritten signature in black ink, appearing to read "Shane Schreiber", with a long horizontal stroke extending to the right. The word "Acting" is written in cursive to the right of the signature.

Shane Schreiber
Managing Director