



November 6, 2017

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

Dear Mr. Seidl:

The Province of Saskatchewan supports the Pelmorex Weather Networks application (2017-0586-5) for the license renewal of The Weather Network/MeteoMedia'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". While mandatory carriage is a significant financial benefit to Pelmorex, we feel this license renewal also provides substantial public benefit overall. The Province of Saskatchewan does have some recommendations to the terms of the application.

The Province of Saskatchewan has a vested interest in this application as it directly impacts national public alerting for all Canadians. This in-turn affects overall public safety both in Saskatchewan and across the country. As the Commission is aware, Pelmorex has been responsible for the national public alerting system (i.e. National Alert Aggregation and Dissemination (NAAD) System) since its inception. The NAAD system is relied upon by all Provinces and Territories to create and disseminate alerts to the public as emergency situations occur. During the previous licensing term, the NAAD System has proven to be a reliable and vital component of the national emergency management strategy which 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.

Through the work and identification expressed through the Governance Council, Pelmorex has undertaken several enhancements to the original NAAD system (see, Appendix 1: Supplementary Brief in the Pelmorex submission). The Province of Saskatchewan is a committed user of the NAAD system and participates actively on the Pelmorex Governance Council and working group/committees, where the decisions on the recommended enhancements to the NAAD system are discussed and agreed to. The introduction of text-to-speech capability through NAAD and the training environment are highlights of recent enhancements to the public alerting system. In coming months, the transition to a cloud computing environment, user interface improvements, an exercise environment, centralized message storage, and Wireless Public Alerting will make the NAAD System a widely accessible, trusted part of the overall national public alerting system.

The current Governance Council structure is not without its challenges. F/P/T Emergency Management Organizations, approach public alerting as a required service necessary to ensure that residents and visitors to Canada receive emergency alerts when there is a threat to their safety. In our experience, Pelmorex considers the Governance council's role to be more advisory in nature, rather than that of an equal partner in decision-making. In many instances, Pelmerox appears to exercise final decision-making authority at Pelmorex's sole discretion and often, benefit. This is an unfortunate consequence of sharing control of our national alerting system with a for-profit organization. Pelmorex cannot be directed in the same manner as could a not for-profit service provider, which is compounded by Pelmorex's assertion that they are providing the NAAD system free of charge. Saskatchewan, therefore recommends increased financial transparency into NAAD System operations on visibility of funds generated by Pelmorex's 9.1h status and the cost to operate the NAAD System. Having that accounting would enable the Governance Council to better understand the cost and effort associated with its system change requests. This in turn would enable the Council to prioritize these requests, which will build strengthened working relationships. This request is only for revenue generated by the mandatory carriage provisions of the Pelmorex license and costs associated with NAAD System operation.

Ensuring service continuity of the public alerting system is another area the Province of Saskatchewan would like strengthened in the application. In the event Pelmorex chooses at any point, to no longer support or operate the NAAD system, we recommend a provision requiring Pelmorex to continue operating the NAAD System until another public alerting partner/system can be established. To ensure there is no break in providing critical public emergency alerts, Saskatchewan recommends the license conditions should include a detailed transition-out plan from Pelmorex including a defined transition period to ensure continuity of service.

Finally, the Pelmorex application spans a seven year period which may be problematic given the expected rate of technological change and the revenues guaranteed with such a lengthy renewal. It is suggested that the license application be amended to a four-year term with an option to extend the license for another three years upon review. This amendment would balance Pelmorex's preference for a long-term business commitment with an ability to assess their performance and weigh public and client satisfaction with the public alerting services being delivered.

Thank you for opportunity to comment on Pelmorex's license application. Saskatchewan does not intend to appear at the public hearing.

Sincerely,



Duane McKay
Commissioner, Emergency Management and Fire Safety

cc: Jean Longpre, Federal Provincial Programs Coordinator