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VIA EMAIL DISTRIBUTION and GC KEY

December 19, 2025

Mr. Marc Morin
Secretary-General
Canadian Radio-television and Telecommunications Commission (CRTC)
sec-gen@crtc.gc.ca

Public record: [1011-NOC2025-0180](#)

Re: [TBNC CRTC 2025-180](#) Public Alerting System, DWCC Reply Comments

Dear Secretary General,

1. Deaf Wireless Canada Consultative Committee (DWCC) hereby submits its **Reply Comments** in the above-noted proceeding concerning the modernization of Canada's National Public Alerting System (NPAS). These Reply Comments respond to the interventions filed by broadcasting undertakings, wireless service providers, emergency authorities, Indigenous organizations, public-interest groups, accessibility organizations, and individual Canadians.

2. DWCC's Reply addresses:

- accessibility barriers affecting Deaf, DeafBlind, Hard of Hearing (DHH), and disabled Canadians;
- the need for ASL, LSQ, and Indigenous Sign Language (ISL) alerting;
- the requirement for multilingual templates and simultaneous bilingual alerts;
- the limitations of wireless-only alerting and the necessity for redundancy across wireless, broadcasting, streaming, and app-based systems;
- technical modernization requirements, including ATSC 3.0 datacasting, haptic/tactile alert support, braille/screen-reader-accessible CAP fields, and accessible presentation standards;
- documented real-world failures experienced during recent wildfires, floods, outages, and emergency events;
- governance and accountability concerns related to public safety, accessibility, and reconciliation.

3. DWCC submits that accessibility and public safety are inseparable. NPAS must be modernized to ensure that every Canadian, including Deaf, DeafBlind, Hard of Hearing, Francophone, Indigenous, newcomer, rural, senior, and disabled populations, can **receive, perceive, understand, and act upon** emergency alerts.

4. DWCC confirms that this filing contains **no confidential information** and may be placed on the public record.

5. We appreciate the opportunity to participate in this crucial proceeding and remain available to provide any further information or clarification the Commission may require.

Respectfully submitted,

Jeff Beatty

Chair

Deaf Wireless Canada Consultative Committee (DWCC)

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SECTION 1 - EXECUTIVE SUMMARY

A Modern, Accessible, Multilingual, Redundant National Public Alerting System Is Required to Protect All Canadians

E1: Deaf Wireless Canada Consultative Committee (DWCC) submits this Reply to address the extensive public record in TBNC CRTC 2025-180, *Call for comments - Public Alerting System*.

E2: The evidence demonstrates that the National Public Alerting System (NPAS), as currently designed, **does not meet the emergency communication needs** of Deaf, DeafBlind, Hard-of-Hearing (DHH), Indigenous, Francophone, rural, senior, newcomer, and disabled Canadians.

E3: Emergency authorities, municipalities, Indigenous Nations, accessibility organizations, public-interest groups, and individual Canadians describe **systemic failures** across wireless, broadcasting, and online alerting pathways. These failures are not one-off anomalies. They recur during wildfires, floods, storms, telecom outages, and critical incidents, placing lives at risk.

E4: By contrast, a small subset of carriers and broadcasters argue for preserving the status quo, oppose multilingual and sign-language improvements, and deny accessibility barriers. Their positions lack evidence, conflict with the *Accessible Canada Act (ACA)* and TRP 2023-41, and do not reflect real-world emergency conditions documented across the country.

E5: The record overwhelmingly supports NPAS modernization that is:

1. Accessible (ASL, LSQ, Indigenous Sign Languages, multi-sensory alerts)
2. Multilingual (simultaneous French/English, Indigenous languages, plain-language templates)
3. Redundant & Resilient (wireless + broadcasting + radio + streaming + app-based)

4. Inclusive of DeafBlind Canadians (haptic, tactile, braille-compatible, screen-reader accessible)
5. Technically modernized (ATSC 3.0, accessible CAP payloads, structured templates)
6. Integrated with Indigenous governance (language access, community media)
7. Aligned with accessibility, public-safety, and reconciliation obligations

E6: DWCC's Reply sets out:

- **Section 2:** Accessibility failures in NPAS
- **Section 3:** Carrier-by-carrier rebuttals
- **Section 4:** DeafBlind Emergency Alerting Framework
- **Section 5:** Sign-language alerting (ASL/LSQ/ISL)
- **Section 6:** Technical and redundancy requirements
- **Section 7:** Broadcasting responsibilities
- **Section 8:** Multilingual requirements
- **Section 9:** Public safety and real-world alert failures
- **Section 10:** Consolidated national recommendations

E7. DWCC urges the Commission to adopt a **modern, multi-path, accessibility-first NPAS** that ensures *no one is left behind during* emergencies - including DeafBlind Canadians who currently face the greatest barriers and the highest risk.

SECTION 2 - ACCESSIBILITY FAILURES IN NPAS (DHH + DEAFBLIND + DISABILITY EVIDENCE)

The Current Alerting System Excludes Millions of Canadians with Disabilities

1. The public record provides overwhelming and consistent evidence that the current NPAS is **not accessible** to Canadians with disabilities, particularly Deaf, DeafBlind, Hard-of-Hearing (DHH), low-vision, blind, neurodivergent, cognitively disabled, and elderly populations.
2. Data from DWCC's *national DHH Survey (2025)*, *national DeafBlind Survey (2025)*, "*No One Left Behind*" *DeafBlind interview study*, CDGM's 56-page filing, DHHC, Neil Squire Society (505-respondent accessibility survey), Audition Québec, and dozens of individuals all document severe barriers in:
 - receiving alerts
 - perceiving alerts
 - understanding alerts
 - taking action on alerts
3. These are **accessibility barriers** within the meaning of the Accessible Canada Act and TRP 2023-41.

2.1 Deaf Canadians Cannot Access Audio- or Text-Only Alerts

4. The record shows that Deaf users:
 - do not hear the alert tone ✗
 - cannot rely on complex English/French text for comprehension ✗
 - often miss small or fast-scrolling text overlays ✗
 - receive *no* sign-language support under the current NPAS ✗
 - face confusion during evacuation or shelter-in-place events ✗
 - often depend on family members or social media to interpret emergency instructions during emergencies.
5. Deaf users require:
 - a. ASL/LSQ emergency alert videos ✓
 - b. LSQ-/ASL-aligned plain language text ✓
 - c. persistent visual notifications ✓
 - d. broadcaster sign-language windows ✓
 - e. streaming alert integration ✓
6. The absence of sign-language access is a clear accessibility failure.

2.2 DeafBlind Canadians Face the Greatest Harm

7. The DeafBlind community consistently reported:
 - a. Audio alerts = inaccessible ✗
 - b. Text alerts = not perceivable ✗
 - c. Vibration patterns = inconsistent or absent ✗
 - d. Braille displays = do not receive full CAP messages ✗
 - e. Screen readers = cannot read many alert overlays ✗
 - f. Wireless-only alerts = fail during outages, leaving DeafBlind users isolated ✗
8. DWCC's DeafBlind Survey and interview participants stated: "If the network goes down, I am completely cut off from danger warnings."
9. Public-safety agencies confirm that **DeafBlind Canadians currently have no reliable way to receive NPAS alerts independently.** They require:
 - a. standardized, persistent haptic alert patterns ✓
 - b. braille-compatible CAP fields ✓
 - c. high-contrast text modes ✓
 - d. screen-reader accessible formatting ✓
 - e. sign-language-linked tactile cues ✓
 - f. redundant multi-path alerting (wireless + broadcast + app) ✓

10. The current NPAS design **does not meet these needs**.

2.3 Hard-of-Hearing Canadians Face Unsafe Volume Levels

11. Evidence from Audition Québec, Alberta Emergency Alert, and individual submissions show:

- alert tones are dangerously loud for hearing-aid and cochlear implant users
- sudden tones can cause pain, device overload, or panic
- users cannot adjust the volume of intrusive alerts
- there is no “safe-volume mode” or vibration-only option

12. Hard of Hearing users require:

- a. adjustable or capped alert volume ✓
- b. vibration-first or vibration-only mode ✓
- c. clear, simple visual text ✓
- d. compatibility with assistive listening devices ✓

13. This is a **public-safety hazard**, and not simply an accessibility issue.

2.4 Cognitive, Sensory, and Mental Health Disabilities Impact Alert Comprehension

14. Data from the National Institute on Ageing and individuals demonstrate that:

- dense, jargon-heavy alerts confuse many users
- neurodivergent individuals may panic from sudden tones
- people with PTSD or anxiety may experience trauma responses
- seniors struggle with visual clutter and complex instructions
- people with cognitive disabilities require simple, structured text

15. Accessibility means **comprehension**, not mere delivery. DWCC supports a national **plain-language standard** for alerts.

2.5 Alerts Must Work for Canadians with Multiple Disabilities

16. Many Canadians have **combined disabilities**:

- a. Deaf + low-vision
- b. Deaf + cognitive
- c. Hard of Hearing + mobility impairments
- d. DeafBlind
- e. Senior + English as a Second Language
- f. Cognitive + sensory

18. The current NPAS does not provide:

- multi-sensory cues
- simplified templates
- multilingual options
- assistive technology compatibility
- redundant fallback channels

19. Accessibility must support *intersectional disability realities*.

2.6 Carriers and Broadcasters Provided No Accessibility Analysis

20. Across TELUS, Rogers, Bell, Québecor, Cogeco, CTA, and other opponents:

- a. No sign-language analysis ✘
- b. No DeafBlind analysis ✘
- c. No ASL or LSQ discussion ✘
- d. No Indigenous accessibility ✘
- e. No braille/screen-reader discussion ✘
- f. No reference to TRP 2023-41 ✘
- g. No reference to ACA barrier-prevention duties ✘
- h. No evidence supporting their claims that NPAS is “working well” ✘

21. Their filings meet **none** of the accessibility obligations expected under federal law.

22. By contrast, DWCC, CDGM, DHHC, Neil Squire Society, FCFA, Indigenous broadcasters, and emergency authorities provide extensive disability evidence.

2.7 Accessibility Failures Are Public-Safety Failures

23. Accessibility barriers lead to:

- missed evacuation orders
- delayed shelter-in-place action

- misunderstood instructions
- loss of trust in alerts
- isolation during outages
- increased injury and mortality risk

24. When NPAS excludes Deaf, DeafBlind, HoH, seniors, newcomers, or Indigenous language speakers, **public safety is compromised**.

25. Accessibility is not a “feature”. It is a **life-safety requirement**.

Section 2 Conclusion

26. NPAS currently contains multiple accessibility barriers under the ACA and TRP 2023-41.

27. Deaf, DeafBlind, Hard of Hearing, visually impaired, cognitively disabled, autistic, sensory-sensitive, senior, newcomer, and Indigenous users cannot reliably receive, perceive, or understand emergency alerts.

28. The Commission must adopt an **accessibility-first modernization framework** that:

- mandates sign-language content (ASL/LSQ/ISL) ✓
- provides multi-sensory alerts ✓
- ensures multilingual and plain-language delivery ✓
- supports braille and screen-reader formats ✓
- ensures redundancy across platforms ✓
- works during outages ✓
- reflects the communication needs of all Canadians ✓

29. Accessibility and safety are inseparable. Improving NPAS accessibility will save lives.

Section 3 Carrier-by-Carrier Rebuttals

Telecom, Wireless, and Broadcasting Distribution Undertakings (BDUs)

30. Deaf Wireless Canada Consultative Committee (DWCC) submits that the positions advanced by the national wireless carriers, broadcasting distribution undertakings (BDUs), and their national association (CTA) do not align with the public record, ignore well-documented accessibility failures, and conflict with the Commission’s obligations under the *Accessible Canada Act (ACA)*, *TRP 2023-41*, and the 2023 Policy Direction.

31. Across TELUS, Rogers, Bell, Québecor, Cogeco, Iristel, Terrestar, and the CTA, a uniform pattern emerges:

- Denial of accessibility barriers, ✗
- Resistance to multilingual and sign-language alerting, ✗
- Minimization of public-safety risks, ✗
- Attempts to shift responsibility away from carriers, ✗, and
- Opposition to necessary improvements in NPAS governance and redundancy. ✗

32. These positions are inconsistent with evidence filed by accessibility organizations, Indigenous nations, emergency authorities, governments, public-interest organizations, and individual Canadians. DWCC addresses each carrier's claims below.

3.1 TELUS Communications Inc.

33. TELUS submits that Wireless Public Alerting (WPA) operates effectively, argues that carriers function merely as “pipes,” opposes additional languages (including Indigenous languages), rejects ASL/LSQ accessibility, and dismisses 3G fallback as unnecessary. TELUS further invokes “regulatory restraint,” suggesting that accessibility and safety improvements fall outside its responsibilities.

DWCC Response to TELUS:

34. TELUS's filing is incompatible with the federal accessibility policy.

35. Under **TRP 2023-41**, carriers must proactively identify, remove, and prevent accessibility barriers. TELUS does not acknowledge Deaf, DeafBlind, or Hard of Hearing users, nor does it conduct any accessibility impact assessment. This omission contradicts ACA requirements and fails barrier-prevention duties.

36. TELUS's assertion that it is only a “pipe” is incorrect. Wireless carriers are the *sole delivery channel* for WPA; when wireless service fails, Deaf and DeafBlind Canadians receive **no alerts at all**. Emergency authorities (BC EMCR, Alberta AEA, City of Calgary) confirm repeated WPA failures during wildfires, floods, and network overload conditions. TELUS's position directly contradicts evidence from real-world public safety.

37. TELUS's opposition to 3G support ignores the reality of rural, remote, and Indigenous communities where 3G remains the only functional wireless technology. Eliminating 3G alerting jeopardizes life safety in these regions and the lives and safety of Deaf, DeafBlind, and Hard of Hearing Canadians, for whom radio-based alerts are inaccessible.

38. TELUS's rejection of ASL/LSQ and tactile/haptic accessibility has no evidentiary basis and contradicts the Commission's obligations to meet the communication needs of Canadians with disabilities.

39. TELUS does not justify excluding multilingual and Indigenous-language alerts and does not reconcile its position with reconciliation commitments and the Commission's broadcasting and telecommunications objectives under s.7 of the Act.

3.2 Rogers Communications Inc.

40. Rogers asserts that existing alerting technology meets all essential needs, opposes multilingual support and sign-language windows, rejects expanded ASL/LSQ accessibility, and resists broadcaster and carrier obligations for redundancy and multi-platform delivery.

DWCC Response to ROGERS:

41. Rogers's claims are inconsistent with the overwhelming evidence that Deaf, DeafBlind, HoH, Francophone, Indigenous, newcomer, and rural residents frequently **do not receive, cannot understand, or cannot act upon** alerts. Survey results from the Neil Squire Society (505 respondents), DWCC DHH and DeafBlind national surveys, and evidence from individual Canadians demonstrate systemic failures in readability, clarity, vibration/tactile cues, timing, geographic accuracy, and support for assistive technologies.

42. Rogers's assertion that sign-language overlays are a broadcaster's responsibility ignores the Commission's authority to impose conditions of service under s.24 applicable to both carriers and BDUs, as well as the accessibility requirements in existing broadcasting policy frameworks.

43. Rogers's opposition to 3G fallback contradicts evidence from emergency authorities that rural corridors rely on legacy technologies for life-safety communication. Rogers's position would worsen inequities in remote areas.

3.3 Bell Canada / BCE Inc.

44. Bell claims that NPAS functions adequately, opposes Indigenous-language integration, rejects ASL/LSQ windows absent EMO-generated content, and argues against expanded carrier or broadcaster obligations.

DWCC Response to Bell Canada:

45. Bell's filing disregards the Commission's responsibility to ensure *accessible communication* under the ACA and TRP 2023-41. Bell's position that ASL/LSQ content cannot be displayed without EMO-provided video fails to recognize broadcasters' obligations to ensure equitable access to emergency information, including through alternate visual presentation (e.g., sign-language windows, avatar interpretation, dynamic templates).

46. Bell's assertion that NPAS is sufficient contradicts emergency authorities (Red Cross, Calgary, BC EMCR), Indigenous organizations (JBCCS, ECN, First Mile), and consumer

evidence demonstrating alerting failures, coverage gaps, unreadable messages, audio-only barriers, and unreliable reception during wireless outages.

47. Bell provides no analysis of DeafBlind emergency accessibility needs, despite clear evidence that DeafBlind subscribers cannot rely on audio alerts and require robust multi-modal tactile and visual cues.

3.4 Québecor Media Inc. (Vidéotron, Freedom Mobile, TVA)

48. Québecor presents the most restrictive linguistic and accessibility issues. It opposes Indigenous-language alerts, opposes multilingual templates beyond French and English, rejects ASL/LSQ windows based on “screen clutter,” and seeks to limit alerting responsibilities for broadcasters and wireless providers.

DWCC Response TO Quebecor:

49. Québecor’s filing conflicts with Canada’s reconciliation commitments, the Commission’s mandate to consider Indigenous broadcasting systems, and the safety needs of Indigenous communities facing disproportionate wildfire and climate-related risks.

50. Its rejection of LSQ and ASL accessibility has no evidentiary basis and contradicts the Commission’s legal obligations under the ACA to ensure accessible communication systems.

51. Québecor provides no data supporting the proposition that additional languages create “risk.” In contrast, FCFA, ACFA, SFM, ARC Canada, Red Cross, JBCCS, and FRPC all demonstrate that *linguistic exclusion itself is a significant safety risk*.

52. DWCC submits that Québecor’s position should be given minimal weight.

3.5 Canadian Telecommunications Association (CTA)

(Representing Bell, Rogers, TELUS, SaskTel, Eastlink, Videotron, Xplore, Cogeco, etc.)

53. CTA argues that WPA already meets public needs, that carriers should not be required to support additional languages or accessibility features, and that redundancy and multi-modal alerting are outside carrier responsibility.

DWCC Response:

54. CTA’s filing is contradicted by virtually every public-safety authority on record. The Red Cross, Alberta AEA, BC EMCR, and City of Calgary all demonstrate that WPA alone is insufficient and that vulnerable populations frequently miss life-critical alerts. CTA ignores evidence from Indigenous nations, public-interest groups, and disability communities.

55. CTA's position fails to meet accessibility duties under TRP 2023-41 and does not recognize DeafBlind needs for tactile, haptic, and multi-sensory alert formats.

56. CTA also mischaracterizes telecommunications obligations: carriers are responsible for *delivering* alerts, and therefore responsible for ensuring those alerts are accessible, intelligible, and available through redundant pathways.

3.6 Cogeco Communications Inc.

Cogeco opposes ASL/LSQ windows, multilingual alerting, and increased broadcaster obligations, citing "screen clutter" and operational burden.

DWCC Response to Cogeco:

57. Cogeco's filing disregards the ACA and the broadcasting accessibility framework that already requires accessibility accommodations. The "screen clutter" argument is discriminatory and unsupported. Broadcasters routinely support captioning, multiple audio tracks, and descriptive video; adding ASL/LSQ windows is neither novel nor technically prohibitive.

58. Cogeco provides no analysis of DeafBlind users and no consideration of Indigenous-language inclusion.

3.7 Iristel Inc. (Northern WSP)

59. Iristel argues that WPA is financially burdensome for northern carriers and that app-based alerting should replace broadcast mechanisms. It acknowledges Indigenous needs "in principle" but asserts such responsibilities lie with EMOs.

DWCC Response to Iristel:

60. App-based alerting cannot replace WPA. DeafBlind users, seniors, and low-income rural residents cannot depend on app-based systems during wildfires, evacuations, or network collapse. Indigenous communities face complex layered infrastructure realities, and NPAS must work for all regions. Carriers operating in northern and Indigenous territories must not be exempt from minimum safety obligations.

3.8 Terrestar Solutions Inc. (Satellite Operator)

61. Terrestar states that satellite alerting is not yet feasible for fine geo-targeting and therefore should be voluntary only.

DWCC Response to Terrestar:

62. Terrestar’s filing reinforces the need for multi-modal redundancy. If a satellite cannot deliver NPAS geo-targeted alerts, this further proves that *wireless cannot be the only platform*. Broadcast, TV, radio, and app-based alerts must all function as coordinated layers.

63. DWCC supports technology-neutral obligations that recognize satellite limitations while still ensuring safety for remote and Indigenous regions.

Section 3 Conclusion

64. The public record demonstrates a clear divide: carriers and BDUs argue for the status quo and for limiting obligations, while public-interest organizations, accessibility groups, Indigenous nations, and emergency authorities demonstrate that the current system does not meet safety or accessibility needs. The carrier bloc offers no substantive accessibility analysis and fails to recognize the communication realities of Deaf, DeafBlind, Hard-of-Hearing, Francophone, and Indigenous communities.

65. DWCC therefore submits that the Commission must reject the carrier positions and adopt a modern, accessibility-centered, multilingual, and redundant national alerting framework.

Section 4: DeafBlind Emergency Alerting Framework

A National Standard for Multi-Sensory, Accessible Emergency Alerts

66. The public record demonstrates that DeafBlind Canadians face the **greatest barriers** to receiving, perceiving, and acting on emergency alerts. Existing NPAS delivery tools—primarily audio signals and on-screen text—are not accessible to DeafBlind individuals and, in many cases, are actively dangerous or ineffective.

67. DeafBlind participants in DWCC’s national surveys, interviews, and focus groups reported:

- **No reliable access** to Wireless Public Alerts (WPA)
- Inability to detect or interpret alerts **without assistive devices**
- Severe limitations due to **missing haptic/tactile cues**
- Alerts that are **silent, inaudible, or invisible** depending on device configuration
- Lack of system-level support for **braille displays** or **screen-reader integration**
- **Inaccessible instructions** during time-sensitive emergencies
- Complete alert failure during **power outages or network collapse**
- Dependence on human intermediaries, which is unsafe during emergencies

68. These findings are consistent with evidence from DWCC’s “No One Left Behind” interview study, DeafBlind survey data, Neil Squire Society’s disability survey (505 respondents), CDGM, DHHC, CACTUS, Red Cross, BC EMCR, and Indigenous emergency authorities.

69. DeafBlind Canadians require a **multi-modal emergency alerting framework** that ensures they receive, perceive, and understand alerts **independently and in real time**, regardless of the communication barriers that exist today.

70. DWCC submits the following **DeafBlind Emergency Alerting Framework (DB-EAF)** for adoption as part of the national alerting system.

4.1 Fundamental Principle: Alerts Must Be Multi-Sensory

71. For DeafBlind Canadians, no single modality is sufficient. A DeafBlind-accessible alert must combine:

1. **Haptic/tactile signals**
2. **Visual contrast cues** (for those with low vision)
3. **Screen-reader and braille output compatibility**
4. **Structured, simple, clear text**
5. **Device-level persistence** with repeat cycles

72. The current Alert Ready system does not meet any of these requirements on its own. WPA's audio tone is unusable for DeafBlind users, and on-screen text is inaccessible to those who cannot see.

73. The Commission must require multi-modal delivery as a condition of service under s.24.

4.2 Required Haptic/Tactile Alert Patterns

74. DWCC recommends that the Commission adopt a **national standard haptic alert pattern** replicating what DeafBlind participants repeatedly described as "the only way I would know an alert is happening." We recommend:

75. A long-short-short repeating pattern

- **Long vibration (1.0s)**
- **Short vibration (0.3s)**
- **Short vibration (0.3s)**
- **Pause (1.0s)**
- **Repeat for 10-12 seconds**
- **Cycle again every 15-20 seconds until user acknowledges**

76. This pattern is:

- distinguishable from notifications
- recognizable to tactile signers
- perceivable through clothing or devices

- non-panic-inducing
- usable for low-battery or low-signal environments

67. Modern smartphones and wearables already support this pattern.

4.3 Compatibility with Braille Displays and Screen Readers

68. DeafBlind participants reported that:

- WPA messages **do not consistently reach braille displays**,
- alerts often **do not trigger screen-reader output**,
- emergency text is sometimes **ignored or truncated** by assistive devices.

69. The Commission must require:

- CAP message structures that expose titles and instructions to OS-level accessibility APIs ✓**
- Mandatory compatibility for external braille displays ✓**
- Support for tactile output where OS permits ✓**
- Plain-language formatting (short, structured, uncluttered) ✓**

70. This framework directly aligns with TRP 2023-41 accessibility-by-design obligations.

4.4 Visual Accessibility for Low-Vision DeafBlind Users

71. A large proportion of DeafBlind individuals have **residual vision** and require:

- High-contrast alert screens (dark-on-light or light-on-dark) ✓**
- Large-text automatic scaling (22 pt minimum) ✓**
- Stable, non-flashing presentation ✓**
- Avoidance of red-only displays (colourblind risk) ✓**

72. DWCC recommends mandatory:

- WCAG 2.2-compliant alert templates**
- Two high-contrast modes**
- No timed dismissal without a haptic double cycle**

4.5 Device-Level Persistence and Acknowledgment

73. DeafBlind users may miss initial cycles. Alerts must:

- a. persist until manually dismissed ✓
- b. repeat haptic cycles every 20-30 seconds ✓
- c. trigger screen-reader output every repeat ✓
- d. activate braille display scrolling automatically ✓

74. No DeafBlind user should miss an alert due to limited perception windows.

4.6 Multi-Modal Alert Redundancy

75. Alert failure during outages is one of the biggest harms to DeafBlind people.

76. DWCC requires the Commission to mandate **three parallel pathways**:

1. Wireless:

WPA with haptic alerts + screen-reader/braille support

2. Broadcast:

ATSC 3.0 datacasting + ASL/LSQ windows

3. Internet/App:

National alert app with accessible templates + taptic response

77. If one fails, others must still function.

78. This aligns with:

- City of Calgary
- BC EMCR
- First Mile Consortium
- FRPC
- Red Cross
- CACTUS
- JBCCS

79. All of the above parties' submissions confirm that *wireless-only alerting is unsafe*.

4.7 DeafBlind-Specific Template Requirements

80. CAP message templates must include:

- **A clear headline** (max 12 words)
- **Plain-language instructions** (“Go now,” “Shelter inside,” “Evacuate via Hwy 16”)
- **Location block** with structured formatting (City → Region → Landmark)
- **Time stamp** in numeric format (YYYY-MM-DD HH:MM)
- **Action verb first** (e.g., “Evacuate now to...”)
- **No jargon, no abbreviations**

81. Templates should be **available in tactile-friendly formats** for braille devices.

4.8 Integration with Sign-Language Alerts (ASL, LSQ, ISL)

82. DeafBlind users who rely on **tactile ASL / LSQ** require access to:

- sign-language video alerts
- sign-language archived versions
- sign-language interpretation of instructions
- sign-language explanations of evacuation routes

83. DWCC recommends:

- All sign-language alerts archived for reference ✓**
- A national ASL/LSQ alert video library ✓**
- EMOs deliver ASL/LSQ text strings to LMDs for automated windowing ✓**
- Broadcasters required to host LSQ/ASL alert windows in CLF-A ✓**

84. JBCCS and CACTUS strongly support Indigenous language and sign-language access.

4.9 Alerts During Power Outages & Network Collapse (Critical for DeafBlind)

85. DeafBlind respondents consistently told DWCC: “If the network goes down, I’m blind and deaf to danger.”

86. WPA often fails during:

- wildfires,
- storms,
- floods,
- rural outages,
- northern network congestion,
- telecom power failures.

87. Therefore:

- ✓ **Broadcasting (ATSC 3.0, FM/AM radio) MUST be part of NPAS**
- ✓ **National alert app MUST work offline for cached instructions**
- ✓ **Redundant datacasting must deliver basic text + haptic trigger**
- ✓ **Telecom carriers must maintain minimum emergency QoS**

88. This requirement is consistently reinforced across numerous parties:

- RMA
- SARM
- BC EMCR
- Calgary
- First Mile
- ECN
- Red Cross
- FRPC

4.10 DeafBlind Testing and Co-Development

89. DWCC submits that:

- a. **Every NPAS change must undergo accessibility testing with DeafBlind participants ✓**
- b. **Carriers and broadcasters must consult DeafBlind communities (TRP 2023-41 requirement) ✓**
- c. **Accessibility Compliance Reports must include DeafBlind usability outcomes ✓**
- d. **A federal Emergency Accessibility Advisory Group must be created ✓**

90. DeafBlind Canadians cannot be “afterthought participants” in emergency design.

Section 4 Conclusion

91. DeafBlind Canadians currently receive emergency alerts **least effectively yet face the highest risk.**

92. The public record demonstrates a broad consensus among accessibility organizations, Indigenous broadcasters, public-safety authorities, community media, and emergency managers that multi-modal, multilingual, and accessible alert systems are urgently needed.

93. The **DeafBlind Emergency Alerting Framework** proposed by DWCC is the only model on the record that:

- a. directly addresses barrier prevention
- b. aligns with ACA and TRP 2023-41
- c. reflects real-world emergency failures
- d. integrates multi-modal redundancy
- e. ensures DeafBlind Canadians receive, perceive, and understand alerts
- f. upholds public-safety obligations

94. DWCC urges the Commission to adopt DB-EAF as the national standard for DeafBlind emergency alert accessibility.

Section 5: ASL, LSQ & Indigenous Sign Language Emergency Alerts

Sign-Language Access as a National Emergency Requirement

95. The public record demonstrates overwhelming consensus among Deaf, DeafBlind, Hard of Hearing, Francophone, Indigenous, rural, and newcomer communities that emergency alerts must be accessible not only in English and French, but also in **American Sign Language (ASL)**, **Langue des signes québécoise (LSQ)**, and **Indigenous Sign Languages (ISL)**, as appropriate and available.

96. Audio alerts and text-only alerts are *not accessible* to sign-language users, and the absence of sign-language alerting places these Canadians at disproportionate risk during life-threatening emergencies.

97. CRTC's mandate under the *Accessible Canada Act*, *TRP 2023-41*, the *Broadcasting Act*, and national reconciliation commitments requires that **no group be left behind in receiving timely, intelligible emergency information**.

98. DWCC therefore proposes a comprehensive **Sign-Language Alerting Framework (SLAF)** that ensures ASL, LSQ, and Indigenous Sign Languages are integrated into the National Public Alerting System (NPAS).

5.1 Sign Language Is an Emergency Language - Not an Optional "Feature"

99. Deaf, DeafBlind, and many Hard-of-Hearing Canadians rely on sign languages as their **first or primary language**.

100. The record shows:

- a. Deaf respondents cannot rely on audio tones ✗
- b. DeafBlind respondents cannot rely on audio or visual-only alerts ✗
- c. Text alerts are often inaccessible due to literacy, complexity, or visual barriers ✗
- d. ASL/LSQ versions are required for understanding instructions in real time ✓
- e. Indigenous Sign Language users need regional linguistic relevance ✓

101. DWCC, CDGM, DHHC, and numerous DeafBlind participants describe the *current NPAS* as inaccessible, unsafe, and confusing without sign-language content.

102. Therefore, sign-language alerting is **not optional**. It is an accessibility requirement under federal law.

5.2 ASL & LSQ Alerts Must Be Mandated

103. DWCC recommends that the Commission require:

- a. **A national sign-language window capability** ✓

All broadcasters, BDUs, and online undertakings must support a sign-language window overlay for emergency alerts.

- b. **ASL & LSQ video versions for all Level 5 (broadcast intrusive) alerts** ✓

Life-threatening alerts (evacuations, wildfires, tornadoes, floods, active threats) must include interpreted ASL/LSQ video.

- c. **EMOs must provide text-to-sign-language assets**

EMOs provide the message content; the alerting system maps it to:

- ASL interpreter window
- LSQ interpreter window
- Optional Indigenous Sign Language overlays

- d. **LMDs (Last Mile Distributors) must carry ASL & LSQ** ✓

Wireless carriers, BDUs, IPTV platforms, and streaming apps must display sign-language versions when available.

- e. **CLF-Accessibility (CLF-A) templates** ✓

Broadcast alerts must comply with:

- fixed position for ASL/LSQ windows
- minimum size of interpreter window
- no obstruction by graphic overlays
- contrast and legibility rules

104. These requirements mirror global best practices for emergency video accessibility.

5.3 Indigenous Sign Languages (ISL) Must Be Integrated

105. Indigenous emergency authorities (JBCCS, First Mile, ECN), community broadcasters (ARCQ et al.), and CACTUS emphasize:

- Indigenous communities are disproportionately affected by wildfires, floods, and evacuations
- Indigenous-language alerting is essential for life safety
- Indigenous-language alerting respects reconciliation obligations
- Some communities use Indigenous Sign Languages for crisis communication

106. DWCC recommends:

a. ISL alerting where capacity exists ✓

Pilot programs with Cree, Dene, Inuktitut, Mi'kmaw, and Plains ISL communities.

b. CRTC-funded ISL alert template development ✓

Parallel to ASL/LSQ template creation.

c. NPAS governance to include Indigenous broadcasters ✓

(As recommended by JBCCS, First Mile, ARCQ.)

d. EMOs must have the capability to supply Indigenous-language content ✓

Where existing community partnerships permit.

107. This is aligned with:

- a. Calls to Action 13-16 (language rights)
- b. CRTC Indigenous broadcasting frameworks
- c. Federal emergency-management reconciliation commitments

5.4 Sign Language Alerts Must Be Included on All Platforms

108. The alert system must support ASL/LSQ/ISL across:

a. Wireless (WPA):

- Interpreter window delivered through OS-level overlay
- Link to ASL/LSQ video asset
- Persistent haptic cues for DeafBlind users

b. Television (broadcast & cable):

- Mandatory interpreter window for Level 5 alerts
- Dynamic switching to sign-language-enhanced feed

c. Streaming / OTT platforms:

- ASL/LSQ video embedded or link to accessible emergency stream
- Captioning synchronized with sign-language window

d. Web & App-based alerts:

- ASL/LSQ video displayed by default
- Compatible with screen readers and large-text modes

109. Today's NPAS does not offer any of these - leaving sign-language communities unprotected.

5.5 National ASL/LSQ Emergency Video Library

110. DWCC proposes a national ASL/LSQ emergency video library supported by:

- federal emergency agencies
- broadcasters
- Deaf organizations (DWCC, CDGM, DHHC)
- LSQ/ASL interpreter networks

111. This library includes pre-interpreted videos for example the following:

- "Evacuate now"
- "Shelter in place"
- "Avoid the area"
- "Prepare to leave"
- "Boil water advisory"
- "Extreme heat warning"
- "Tornado warning"

- “Amber Alert: child abducted”
- “Civil emergency”

112. This reduces response time during real emergencies and provides sign-language parity.

5.6 Sign Language Alerts Must Support DeafBlind Users

113. Sign language content also benefits DeafBlind people who use:

- a. tactile ASL/LSQ interpretation
- b. close-vision ASL/LSQ
- c. screen magnification
- d. braille translation of sign-language captions

114. DWCC recommends:

- a. ASL/LSQ versions always linked to haptic alert triggers ✓
- b. Interpreter videos designed with high contrast and clear signing zone ✓
- c. Optional downloadable transcripts for braille use ✓

5.7 Broadcasters Must Not Hide Behind “EMO Content” Arguments

115. Multiple carriers and broadcasters (Bell, Rogers, Québecor, Cogeco, CAB) argue:

“We cannot display sign language unless EMOs provide sign-language videos.”

116. This argument is unsound:

1. **Broadcasters already add accessibility layers** without EMO-provided content (captioning, DV).
2. A **national ASL/LSQ template system** can be integrated into NPAS infrastructure.
3. Sign-language alerts are **communication formats**, not “additional EMO content.”
4. Under ACA and TRP 2023-41, broadcasters must ensure communication is accessible.

117. Therefore, broadcasters cannot absolve themselves of accessibility responsibility.

5.8 Sign Language Alerts Are Supported Across the Record

118. Strong support came from:

- **Deaf-led organizations:** DWCC, CDGM, DHHC
- **Accessibility orgs:** Neil Squire Society, Audition Québec

- **Francophone orgs:** FCFA, ACFA, SFM
- **Community media:** CACTUS, ARCQ et al.
- **Indigenous broadcasters:** JBCCS, ECN, First Mile
- **Emergency/safety authorities:** Red Cross, Calgary, BC EMCR

119. Opposition came only from:

- Québecor
- Cogeco
- CAB
- CTA
- A subset of large carriers

120. The Commission should prefer the evidence-based majority on accessibility.

Section 5 Conclusion

121. ASL, LSQ, and Indigenous Sign Language alerts are **essential for public safety** and **mandatory** for accessibility compliance. The current NPAS system excludes sign-language users, contradicting federal accessibility legislation and demonstrating a significant barrier to equal emergency communication.

122. DWCC's Sign Language Alerting Framework (SLAF) provides a practical, scalable, and lawful approach to ensuring that Deaf, DeafBlind, and LSQ users receive the same life-saving information as all other Canadians.

123. DWCC urges the Commission to adopt SLAF as part of the national public alerting modernization initiative.

Section 6: Technical, Redundancy & Resiliency Requirements

A Multi-Path Emergency Alerting System for All Canadians

124. The public record overwhelmingly demonstrates that **Wireless Public Alerting (WPA) alone is not sufficient** to ensure public safety. Wireless alerts fail during:

- network outages,
- tower congestion,
- power failures,
- rural and Indigenous coverage gaps,
- spectrum border interference (e.g., U.S. signals in BC),
- decommissioning of legacy technologies (3G),
- device compatibility issues,
- DeafBlind inaccessibility to audio/text-only alerts.

125. Emergency authorities-including **BC EMCR, Alberta AEA, City of Calgary, and Canadian Red Cross**-all confirm that **relying solely on WPA is unsafe**, especially for vulnerable and isolated populations.

126. DeafBlind and Deaf users, rural residents, Indigenous Nations, seniors, and newcomers are disproportionately impacted when wireless alerting fails.

127. DWCC submits that a modern NPAS must be **multi-modal, redundant, and resilient**, capable of delivering life-saving information under a wide range of failure conditions.

6.1 Wireless-Only Alerting Fails Too Often to Be Safe

128. Wireless alerts fail in predictable conditions:

- a. **During wildfires (network congestion, tower burnouts, power outages) ❌**

Confirmed by: RMA, SARM, BC EMCR, Calgary, JBCCS, First Mile.

- b. **During storms & floods (power failures) ❌**

WPA requires powered towers; broadcasting does not.

- c. **During rural network gaps ❌**

Carriers significantly overstate LTE coverage; rural residents file dozens of complaints stating they **never** receive alerts.

- d. **For DeafBlind users ❌**

WPA does not provide tactile or braille-output accessibility, and audio-only alerts are meaningless.

- e. **When devices are on Wi-Fi only ❌**

Millions of Canadians in apartments, basements, and rural regions rely on Wi-Fi, not LTE, especially during outages.

- f. **When 3G decommissioning removes last-resort connectivity ❌**

Removing 3G WPA harms rural, Indigenous, and low-income users.

129. Conclusion: WPA alone cannot be considered a reliable emergency alert mechanism.

6.2 Redundancy Is Not Optional. It Is a Public Safety Obligation

130. A resilient alerting ecosystem must include:

1. Wireless (WPA) as a primary pathway but not sufficient.

2. Broadcasting (TV, Radio, ATSC 3.0)

- Operates during power outages
- Reaches remote areas
- Supports sign-language windows
- Supports multilingual display
- Does not depend on telecom networks

Humber Polytechnic, CACTUS, City of Calgary, ARCQ, and multiple broadcasters confirm the critical role of **NextGen TV (ATSC 3.0)** for datacasting emergency alerts.

3. Internet & App-Based Alerts

- Accessible design (large text, ASL/LSQ videos)
- Alerts delivered over Wi-Fi only
- Supports DeafBlind haptic triggers
- Accessible archive for reviewing missed alerts

Red Cross, PIAC, FRPC, CCC, and DWCC all emphasize this gap.

4. Radio (FM/AM + community & Indigenous radio)

- Survives power outages longer
- Essential for remote & Indigenous communities
- Works with backup generators
- Trusted during evacuations (ARCQ, JBCCS, CACTUS)

5. Satellite / NTW / MSS (as available)

- Useful as backbone redundancy in northern regions
- Does not replace geo-targeted alerts but supports resilience

A modern NPAS must use all available channels to ensure no Canadian is left unreachable.

6.3 3G Must Be Maintained for Minimum Emergency Fallback

131. Multiple emergency and municipal authorities (RMA, SARM, City of Calgary) confirm:

- Many rural and Indigenous areas **only** have functional 3G
- LTE towers fail during extended emergencies
- Seniors and low-income users rely on older devices
- Eliminating 3G alerting is a safety hazard

132. Contrary to TELUS, Rogers, and Bell's assertions, **3G WPA must remain active** as long as 3G networks operate.

133. This aligns NPAS with **real-world conditions**, not carrier marketing plans.

6.4 ATSC 3.0 Emergency Datacasting Is Essential

134. ATSC 3.0 enables:

- High-reliability broadcast alert delivery
- Mapping, images, shelter locations, and instructions
- Multi-language + ASL/LSQ + ISL video
- Indoor penetration superior to LTE
- Redundancy during wireless outages
- Low-bandwidth message delivery (good for DeafBlind)

135. Humber Polytechnic and City of Calgary provide detailed evidence for ATSC 3.0's emergency capabilities.

136. DWCC strongly supports ATSC 3.0 integration into NPAS.

6.5 National Alert App: Accessibility-First Design

137. A national alert app should **not** replace WPA, but should act as:

- a. Redundant delivery during wireless outages ✓**
- b. Core channel for accessible templates (ASL/LSQ videos, large text) ✓**
- c. Tactile/haptic alert triggers ✓**
- d. Braille-friendly formatting ✓**
- e. Alert archive and review system ✓**

138. Public support from PIAC, CCC, Red Cross, CACTUS, First Mile, BC EMCR, Calgary, and many individuals confirms the need.

139. DWCC recommends that the app:

- a. works in **Wi-Fi-only mode**
- b. stores pre-downloaded ASL/LSQ videos
- c. supports vibration patterns for DeafBlind users
- d. must not depend on Pelmorex's commercial design alone
- e. must operate in low-bandwidth mode

6.6 Technical Requirements for Accessible Alerts

140. DWCC recommends that emergency CAP messages must support:

- a. **Screen-reader readable metadata ✓**
- b. **Braille-output compatibility ✓**
- c. **ASL/LSQ/ISL video URL fields ✓**
- d. **High-contrast visual templates ✓**
- e. **Multi-sensory alert triggers ✓**
- f. **Plain-language structure ✓**
- g. **Consistent labeling tags ✓**
- h. **Multilingual payload metadata ✓**
- i. **Geo-targeting accuracy improvements ✓**

141. This aligns with FRPC, CACTUS, Neil Squire Society, First Mile, and JBCCS suggestions.

6.7 Public Safety Requires System-Level Resiliency Rules

142. The Commission's concurrent resiliency proceeding (TNC 2025-226) establishes that:

- Networks fail during emergencies
- Infrastructure redundancy is essential
- Disruptions disproportionately affect vulnerable populations

143. DWCC submits that **alerting resiliency cannot be siloed from telecom resiliency.**

144. Therefore:

- a. **WPA obligations must include minimum emergency QoS ✓**
- b. **Carriers must provide outage-resistant pathways for alerts ✓**
- c. **NPAS must be integrated with resiliency standards ✓**
- d. **Wireless fallback must include at least one non-LTE pathway ✓**
- e. **Broadcasters must maintain mandatory alert capability even during reduced-service states ✓**

145. This ties NPAS modernization to the national resiliency framework.

6.8 Redundancy Protects Accessibility Users

146. For DeafBlind users:

- Audio-only alerts = inaccessible ✘
- Text-only alerts = inaccessible or insufficient ✘
- Wireless-only alerts = unreliable ✘

147. The system must deliver alerts in **multiple formats** simultaneously:

- Haptic**
- Visual**
- Braille**
- Sign language**
- Multi-language text**
- Broadcast fallback**
- Wi-Fi fallback**
- App-based redundancy**

148. This ensures no single point of failure eliminates alert delivery.

Section 6 Conclusion

149. The record demonstrates that Canada's alerting system must evolve from a **single-path, audio-dominant, wireless-dependent model** to a **redundant, multi-platform, accessibility-first ecosystem**.

150. Emergency authorities, Indigenous organizations, public-interest groups, broadcasters, accessibility experts, and individual Canadians all support modernization. Only the carrier bloc opposes these improvements.

151. DWCC's Technical, Redundancy, and Resiliency Framework offers a concrete, scalable, evidence-based solution that protects all Canadians - including Deaf, DeafBlind, and Hard-of-Hearing populations who face the highest risk in emergency situations.

152. DWCC urges the Commission to adopt the recommendations in this section as core NPAS modernization requirements.

Section 7: Broadcasting Responsibilities & Accessible Alert Presentation

Ensuring Emergency Alerts Are Visible, Understandable, and Accessible on All Broadcast Platforms

153. The public record demonstrates that broadcasters, BDUs, and online streaming platforms play a **central role** in delivering emergency alerts - especially when wireless networks fail. Yet many broadcasters in this proceeding (Québecor, Corus, Cogeco, CAB) argue that alert presentation is “not their responsibility,” that accessibility obligations should remain minimal, and that ASL/LSQ windows or multilingual presentation would “clutter” or “confuse” the screen.

154. These positions are inconsistent with:

- the *Broadcasting Act*
- the *Accessible Canada Act*
- TRP 2023-41 (accessibility obligations)
- the Online Streaming Act
- CLF-Accessibility principles
- the Commission’s established jurisprudence on broadcast accessibility
- evidence submitted by disability organizations, Indigenous broadcasters, and emergency authorities

155. Broadcast accessibility is a **shared obligation**, not optional.

156. DWCC submits a modern broadcast accessibility framework aligned with public-safety realities and accessibility requirements.

7.1 Broadcasting Is a Critical Redundancy Pathway in Emergencies

157. Evidence from BC EMCR, City of Calgary, CACTUS, ARCQ et al., JBCCS, Golden West, and community radio organizations confirms:

a. Broadcasting works when wireless fails

Power outages, tower failures, LTE congestion, roaming misconfigurations, and 3G decommissioning all lead to wireless alert failures.

b. Broadcasting remains stable because:

- radio & TV have backup generators
- ATSC 3.0 has strong indoor penetration
- transmission sites have resilience built in
- radio serves rural & Indigenous communities without LTE

c. Deaf, DeafBlind, HoH users rely on visual & sign-language content

Broadcast platforms offer the **best environment** to present:

- a. ASL/LSQ windows
- b. Indigenous Sign Language (ISL) pilots
- c. high-contrast text
- d. large-font templates
- e. multi-language versions
- f. audio + visual redundancy

d. Streaming platforms reach millions who do not have TV or cable

PIAC, CCC, and FRPC highlight a major gap:

e. Streaming platforms currently deliver no alerts at all.

158. DWCC submits that all broadcasters, including online undertakings, must participate in NPAS accessibility.

7.2 Rejecting Broadcaster Arguments Against Accessibility

159. Major broadcasters (Québecor, Corus, Cogeco, CAB) argue:

- **“Sign-language windows create screen clutter.”**
- **“Alerts should remain text-only on TV.**
- **“No need for multilingual presentation.”**
- **“Only EMOs can supply sign-language videos, so broadcasters cannot show them.”**
- **“We should not be required to add overlays, windows, or dynamic visual changes.”**

160. These arguments are **incorrect** and contradict existing obligations:

- a. Broadcasters already add overlays (e.g., captions, DV indicators, Sports tickers, news crawls).**
- b. Sign-language windows are common globally (Japan, U.S. FEMA, U.K. Ofcom, New Zealand Civil Defence).**
- c. Accessibility is not optional under the ACA - broadcasters must ensure communication is accessible regardless of EMO content format.**
- d. Template-based LSQ/ASL windows do not clutter the screen when properly designed and standardized.**
- e. Community broadcasters Support LSQ and multilingual alerts.**
- f. CLF-A provides clear rules for non-obtrusive window placement.**

161. DWCC submits that the “clutter” argument is discriminatory and has no evidentiary basis.

162. No broadcaster provided a technical limitation preventing sign-language accessibility.

7.3 Sign-Language Windows (ASL/LSQ) Must Be Mandatory for Level 5 Alerts

163. For life-threatening alerts (e.g., wildfire evacuation, tornado warning, active threat):

164. **DWCC recommends:**

- a. **Mandatory ASL/LSQ windows on TV broadcast alerts ✓**
- b. **Optional ISL windows for Indigenous Nations**
- c. **Standardized template (CLF-A) for interpreter placement**
- d. **Automatic switching to accessible overlays when alerts begin**
- e. **Persistent display until the alert stops**
- f. **Non-obstructed signing zone, based on WCAG video standards**

165. This is supported by:

- DWCC, CDGM, DHHC
- CACTUS, ARCQ, Indigenous radio networks
- FCFA, ACFA, SFM (Francophone OLMCs)
- City of Calgary, BC EMCR, Red Cross
- Neil Squire Society, PIAC, CCC

166. Opposition comes *only* from a subset of broadcasters attempting to avoid accessibility obligations.

7.4 All Broadcasters Must Support Multi-Language Alert Presentation

167. Broadcasters frequently argued (Québecor, CAB, Corus) that multilingual templates are too difficult or would “confuse viewers.”

168. Evidence from:

- Francophone organizations (FCFA, ACFA, SFM)
- Indigenous broadcasters (JBCCS, ARCQ et al.)
- newcomers, ESL speakers, and seniors
- Red Cross
- PIAC, CCC
- CACTUS
- DWCC’s DeafBlind/DHH surveys

...all show the opposite: **Failure to provide multilingual and sign-language alerts places people at greater risk.**

169. DWCC recommends:

- a. **Broadcasters display alerts in French and English simultaneously** ✓
- b. **Support for LSQ/ASL** ✓
- c. **Optional Indigenous languages in regions where EMOs provide them** ✓
- d. **Broadcasting of multi-language templates via ATSC 3.0 datacasting** ✓
- e. **A federal multilingual CAP template library (pre-secured, pre-tested)** ✓

170. There is no technical barrier - only a policy barrier.

7.5 Broadcasting Must Follow CLF-A (Canada's Accessibility Standard)

171. Broadcasters argued that new obligations create complexity.

172. DWCC reminds the Commission:

- a. The **CLF-A (Canada's Accessibility Standard for digital content)** already exists.
- b. TRP 2023-41 requires accessibility-by-design.
- c. Broadcasting accessibility guidelines already govern captions, DV, contrast, font, readability.

173. DWCC recommends CLF-A be applied to NPAS alerts:

- a. **High contrast (WCAG 2.2 AA minimum)** ✓
- b. **Large text (min 22pt equivalent)** ✓
- c. **No flashing text** ✓
- d. **Stable positioning** ✓
- e. **Consistent header/alert body formatting** ✓
- f. **Clear iconography (evacuate, shelter, avoid area)** ✓
- g. **Bilingual + sign-language template compatibility** ✓

174. This protects seniors, low-vision users, DeafBlind users, and neurodivergent users.

7.6 Streaming Platforms (Online Undertakings) Must Be Integrated into NPAS

175. Public-interest organizations (PIAC, FRPC, CCC) and individuals highlight a major gap:

Streaming platforms display no alerts at all.

176. Netflix, YouTube, Amazon Prime, Crave, Disney+, and similar services are increasingly the **primary viewing platform** for:

- youth
- Deaf and HoH viewers
- ASL/LSQ language communities
- rural cord-cutters
- Indigenous broadband users
- low-income households relying on Wi-Fi

177. DWCC recommends:

- a. All regulated online undertakings must support intrusive alert overlays ✓**
- b. CAP alert text must appear over streaming content ✓**
- c. ASL/LSQ videos must be linkable or embedded ✓**
- d. Haptic/tactile triggers must function at the device level ✓**
- e. Multilingual display supported at the app interface ✓**

178. Alerting cannot be restricted to “traditional TV” in a streaming-dominant media landscape.

7.7 Community Broadcasters & Indigenous Media Are Essential Safety Infrastructure

179. CACTUS, ARCQ, Golden West, JBCCS, and ECN show:

- a. Community and Indigenous radio is a fail-safe during telecom outages
- b. Local broadcasters provide contextual instructions (roads, shelters, wildfire directions)
- c. Indigenous communities require Cree, Dene, Inuktitut and other languages
- d. Community media have high trust during emergencies
- e. Funding is needed to modernize alerting equipment

180. DWCC fully supports:

- a. Funding for community & Indigenous broadcasters
- b. Inclusion of Indigenous Sign Languages
- c. Multi-language CAP streams
- d. ATSC 3.0 community transmission pilots

181. These broadcasters fill the gaps left by commercial networks.

7.8 Broadcasters Must Not Shift Responsibility onto EMOs

182. Bell, Rogers, Québecor, Corus, Cogeco, CAB all argued: “We cannot provide LSQ/ASL/Indigenous languages unless EMOs give us sign-language videos.”

183. This is incorrect.

184. DWCC clarifies:

a. **Broadcasters provide formats, not content.** They already:

- generate captions,
- manage DV audio,
- add graphics,
- embed emergency crawls.

Adding ASL/LSQ windows is a formatting function - the meaning remains EMO-supplied.

b. **EMOs provide text; NPAS infrastructure maps it to sign-language templates.** A national ASL/LSQ template library solves this.

c. **Accessibility is a broadcaster obligation under the ACA.** It does not depend on EMO interpretive capacity.

185. The Commission must reject any argument suggesting broadcasters are exempt from accessibility.

Section 7 Conclusion

186. Broadcasting - including TV, radio, and streaming platforms - is a **core component** of Canada’s emergency alerting system. The public record shows strong support for:

- ASL/LSQ alert windows
- Indigenous Sign Language integration
- Multilingual templates
- ATSC 3.0 datacasting
- CLF-A-compliant visual presentation
- Streaming platform participation
- Community & Indigenous broadcaster support

187. Opposition comes only from a small subset of large broadcasters seeking to limit accessibility obligations.

188. DWCC urges the Commission to adopt a **broadcast accessibility framework** that ensures alerts are clearly visible, intelligible, bilingual, multi-modal, and sign-language accessible across all broadcasting and online undertakings.

DWCC Reply - Section 8: Multilingual Alerting Requirements

Ensuring All Canadians Receive Comprehensible, Actionable Emergency Information

189. The public record demonstrates overwhelming support for **multilingual emergency alerts**, particularly for Francophone minority communities (OLMCs), newcomers, Indigenous Nations, and communities where English or French is not the primary language.

190. By contrast, a small subset of large broadcasters and carriers (Québecor, CAB, Corus, Cogeco, CTA) oppose expanding beyond English and French, citing cost, “confusion,” or “screen clutter.”

191. These arguments are unsupported, contrary to evidence, and incompatible with the *Broadcasting Act*, the *Accessible Canada Act*, and the Commission’s obligations to serve diverse linguistic communities.

192. DWCC submits that Canada’s emergency alerting system must adopt a **modern multilingual alerting framework** that ensures every Canadian receives clear, intelligible information in a language they understand.

8.1 Linguistic Barriers Are Safety Barriers

193. The record shows that many Canadians did **not** understand past emergency alerts. Evidence comes from:

- **FCFA, SFM, ACFA** (Francophone OLMCs)
- **JBCCS, First Mile, ECN** (Indigenous communities)
- **Red Cross, CCC, PIAC** (public-interest / newcomer communities)
- **individual Canadians** (dozens describing confusion or unreadable alerts)

194. Common failures include:

- English-only alerts in minority Francophone regions
- Alerts using complex vocabulary unfamiliar to newcomers
- Indigenous communities receiving alerts only in English
- Instructions that are not plain language
- Alerts missing LSQ text equivalents
- Alerts that do not reflect regional linguistic reality

195. The Commission itself recognizes that comprehension is a fundamental component of accessibility and public safety.

8.2 Mandatory Bilingual Alerts (English + French)

196. DWCC supports the strong submissions from FCFA, ACFA, SFM, CBC/Radio-Canada, and ARC Canada:

- a. **All emergency alerts must be delivered simultaneously in English and French ✓**
- b. **No region should receive English-only alerts ✓**
- c. **No delays between language versions ✓**
- d. **Both languages must appear on all platforms (TV, radio, wireless, streaming, apps) ✓**
- e. **Alerts must be readable, plain-language, and conform to CLF-A accessibility standards ✓**

197. The record contains numerous examples where:

- Alberta Francophones received only English alerts
- Manitoba Francophones received unreadable / inconsistent French versions
- Francophone radio did not receive CAP alerts in French input format
- Federal alerts defaulted to English despite being outside Quebec

198. Mandating bilingual alerts is essential for compliance with the Official Languages Act and for ensuring Francophone communities are not placed at increased safety risk.

8.3 LSQ and ASL Text Integration Is Required

199. LSQ users - including DDBHH Canadians - reported:

- difficulty understanding dense French text
- missing key instructions
- misinterpreting evacuation routes
- relying on LSQ interpretation for comprehension

200. DWCC recommends:

- a. **All alerts must include short, plain-language LSQ-aligned text ✓**
- b. **Keywords should match LSQ semantic structures ✓**
- c. **LSQ video (Section 5) must accompany Level 5 alerts ✓**
- d. **Bilingual (FR/EN) + sign-language template bank must be adopted nationally ✓**

201. This aligns with submissions from DHHC, CDGM, Neil Squire Society, and OLMC groups.

8.4 Indigenous Language Support Is Necessary and Feasible

202. Indigenous emergency and media groups (JBCCS, First Mile, ECN, ARCQ et al.) provide compelling evidence:

- Indigenous communities repeatedly **did not receive** or **did not understand** emergency alerts during wildfires
- English/French-only NPAS contributes to mistrust and poor emergency outcomes
- Cree language instructions were often needed **urgently** during Mistissini evacuations
- Local radio translated alerts manually due to NPAS not providing them

203. DWCC supports their recommendations:

a. Indigenous-language alerts must be supported where EMOs provide them ✓

b. NPAS must allow CAP payloads in Indigenous languages ✓

c. Indigenous broadcasters must be included in NPAS co-design ✓

d. Indigenous Sign Languages (ISL) must be piloted in regions where they are actively used ✓

e. ATSC 3.0 can distribute Indigenous-language templates ✓

204. Opposition from Québecor and CAB is unsupported and contradicts federal reconciliation policy.

8.5 Multilingual Templates: A Modern Emergency Tool, Not a Burden

205. Contrary to claims from Cogeco, Corus, Québecor, and CTA:

- Multilingual templates do **not** clutter screens
- Templates are **pre-generated**, not created in real time
- CAP already supports multiple language payloads
- ATSC 3.0 can distribute dozens of languages simultaneously
- Broadcasters routinely manage multiple visual layers (crawls, graphics, tickers)

206. DWCC recommends a **national multilingual template library**, including:

a. Base templates for:

- Evacuation
- Shelter-in-place
- Wildfire proximity warning
- Flood warning

- Tornado warning
- Heat emergency
- Hazardous material alert
- “All clear”

b. Output languages supported initially:

- English
- French
- Cree and/or regional Indigenous language where provided
- LSQ-aligned French text
- ASL-aligned English text
- High-frequency newcomer languages (plain text versions), e.g.:
 - Arabic
 - Mandarin
 - Punjabi
 - Tagalog

207. Templates expand Commonwealth and international best practices (e.g., FEMA IPAWS multilingual support).

8.6 Plain-Language Mandatory Standard

208. Emergency alerts often include:

- complex vocabulary
- long sentences
- unfamiliar acronyms (EOC, RM, EMA)
- ambiguous instructions
- poor readability for DHH, DB, cognitive disabilities, ESL speakers, seniors

209. DWCC recommends:

- Maximum Grade 6 reading level ✓**
- Short direct sentences ✓**
- Action-first structure (“EVACUATE NOW → go to ___”) ✓**
- Mandatory icon set (shelter, evacuate, hazard, flood, tornado) ✓**
- Numeric location references ✓**
- No jargon or abbreviations ✓**

210. PIAC, CCC, Neil Squire Society, and Red Cross strongly support plain-language alerts.

8.7 Streaming, Apps, and Online Platforms Must Carry Multilingual Alerts

211. Millions of Canadians now rely exclusively on:

- Netflix
- YouTube
- Amazon Prime
- CBC Gem
- Crave
- Disney+
- TikTok, Instagram
- IPTV apps (Bell Fibe TV, Rogers Ignite)

212. FRPC, PIAC, CCC, CACTUS, and numerous individuals highlight that **streaming services currently carry zero alerts**.

213. DWCC recommends:

- a. CAP text must display over streaming video ✓**
- b. ASL/LSQ video link included ✓**
- c. FR + EN simultaneous display ✓**
- d. Indigenous + newcomer language templates available ✓**
- e. Accessible extension for DeafBlind (tactile/haptic integration in app mode) ✓**
- f. Online undertakings regulated under the Online Streaming Act must comply ✓**

214. This closes the largest alerting gap reported in the proceeding.

8.8 Why Multilingual Alerts Strengthen Public Safety

215. Opponents argue multilingual alerts are confusing. The record shows the opposite:

- Confusion arises when people **cannot understand the alert**, not when they receive it in their language.
- Newcomers rely on multiple languages to process emergency instructions.
- Francophone Official Language Minority Communities (OLMCs), as well as English-speaking minority communities in Quebec and other bilingual provinces (such as New Brunswick), require clarity equal to majority-language regions.
- Cree communities require Indigenous languages for immediate comprehension under stress.
- Deaf and DeafBlind Canadians require LSQ/ASL-aligned text for comprehension.

216. Multilingual alerts **reduce panic, improve compliance, and increase clarity** - a public safety benefit.

Section 8 Conclusion

217. Multilingual emergency alerts are not a convenience; they are a **public-safety requirement** grounded in equity, accessibility, reconciliation, and linguistic rights.

218. The record overwhelmingly supports:

- Bilingual (FR/EN) mandatory alerts
- LSQ/ASL sign-language integration
- Indigenous-language alerting capacity
- Multilingual plain-language templates
- Broadcasting and streaming obligations
- National multilingual template library

219. Opposition comes only from a small subset of broadcasters seeking to limit obligations.

220. DWCC urges the Commission to adopt a modern multilingual alerting framework that protects all Canadians, including Francophones, Indigenous peoples, newcomers, Deaf, DeafBlind, and vulnerable populations.

Section 9: Public Safety & Real-World Alert Failures

Evidence from Emergencies, Municipalities, Indigenous Nations, Individuals, and Accessibility Communities

221. The public record demonstrates that the current National Public Alerting System (NPAS), as delivered through Wireless Public Alerting (WPA), television, radio, and online platforms, **does not meet the safety needs of Canadians**-especially Deaf, DeafBlind, Hard-of-Hearing, Indigenous, rural, and newcomer populations.

222. Emergency authorities, municipalities, Indigenous broadcasters, consumer groups, and individual Canadians describe repeated failures during real emergency events, including wildfires, floods, storms, evacuations, police incidents, and infrastructure outages.

223. These failures are **not theoretical**. They are documented, recurring, and systemic.

224. A modernized NPAS must respond to these real-world problems, not the idealized version described by certain carriers and broadcasters.

9.1 Emergency Authorities Confirm Systemic Alert Failures

225. Multiple emergency management organizations (EMOs) highlight failures of existing alerting pathways.

BC Ministry of Emergency Management and Climate Readiness (EMCR)

226. Confirms:

- Alerts **did not reach** many residents during 2023-24 wildfires.
- Wireless networks **collapsed under load**, leaving thousands unalerted.
- U.S. tower interference created **coverage gaps** near the border.
- Rural and Indigenous communities were hit hardest.
- Clarity and accessibility of alerts must be improved.
- Broadcasting (TV/radio/ATSC 3.0) is essential as a **redundancy layer**.

Alberta Emergency Alert (AEA)

227. Reports:

- Audio tone is **dangerous for people with hearing aids/implants**.
- Alerts during sleep hours caused **startle responses** and unsafe conditions.
- Poorly targeted alerts (wrong region/time) reduced **public trust**.
- Calls for clearer text, tactile/haptic support, and multi-path delivery.

City of Calgary

228. Submits:

- Wireless-only alerting is unsafe during wildfires and floods.
- ATSC 3.0 broadcast datacasting is essential for **redundant emergency alerts**.
- Alerts must support **ASL/LSQ**, multilingual templates, and accessible visual formats.
- Evacuation instructions were frequently misunderstood due to text complexity.

229. These authorities directly contradict TELUS, Rogers, Bell, and Québecor claims that NPAS “works well” or that no improvements are needed.

9.2 Rural & Municipal Governments Report Life-Safety Risks

Rural Municipalities of Alberta (RMA)

230. Document:

- Residents in rural regions **never receive alerts** due to LTE gaps.
- Highway alert blind spots place evacuees at risk.
- Many residents rely on 3G-only devices; eliminating 3G alerting is dangerous.
- Wireless-only system fails under wildfire conditions.

Saskatchewan Association of Rural Municipalities (SARM)

231. Report:

- LTE coverage overstatements by carriers leave huge unserved areas.
- Residents often **depend on radio**, not wireless, for emergencies.
- Need for national alert app and radio/text redundancy.

City of Calgary (municipal perspective)

232. Highlights:

- NPAS must include **broadcast, radio, online undertakings**, and **ATSC 3.0**.
- Failure of one pathway cannot eliminate alert access.

233. These real-world municipal reports demonstrate that current NPAS governance does not reflect actual risks.

9.3 Indigenous Nations Experience Severe Alert Failures

234. No groups face greater alerting inequities than Indigenous communities.

235. Submissions from **JBCCS, Eeyou Communications Network, First Mile Connectivity Consortium**, and community broadcasters confirm:

- a. **Alerts did not reach Cree communities during Mistissini wildfires ✓**
- b. **Indigenous languages were missing entirely ✓**
- c. **Residents received English-only instructions they could not interpret ✓**
- d. **Telecom outages left communities disconnected from NPAS ✓**
- e. **Community radio manually translated alerts due to system gaps ✓**

- f. **Network collapse made wireless alerts useless during evacuations ✓**
- g. **Elders and Deaf/DeafBlind Indigenous people were effectively unprotected**

236. These failures are **public-safety harms**, not mere “inconveniences.”

237. They require Commission action consistent with reconciliation and Indigenous broadcasting policy.

9.4 Deaf, DeafBlind & Hard-of-Hearing Canadians Face the Greatest Barriers

239. DWCC’s national DHH Survey, DeafBlind Survey, “No One Left Behind” qualitative interviews, CDGM, DHHC, Neil Squire Society, and individual submissions reveal:

240. Deaf 🚨

- Alerts arrive with **no sign-language access**.
- Complex text leads to misunderstanding of evacuation instructions.
- Flashing banners or scrolling text are often too fast or low contrast.

241. DeafBlind 🚨

- Audio alerts = useless
- Text alerts = unreadable or non-perceivable
- Vibrations = inconsistent or absent
- Screen reader output often fails to capture alert information
- Braille displays rarely receive the full CAP message
- Wireless alerts fail precisely when needed most (during outages)

242. Hard-of-Hearing 🚨

- Alert tones are **dangerously loud** when using hearing aids or cochlear implants (Audition Québec, AEA).
- Tone-induced pain creates trauma and increases device risk.
- Need safe-volume mode + haptic alternative.

243. The current NPAS excludes Deaf, DeafBlind, and HoH Canadians from life-saving information, which is a direct accessibility barrier under the ACA.

9.5 Seniors & Persons with Cognitive, Sensory, or Mental Health Disabilities

244. Submissions from **National Institute on Ageing** and individual Canadians highlight:

- Confusion caused by dense, technical language
- Difficulty processing rapid scrolling text
- Inability to understand instructions while under stress
- Alerts delivered at unsafe times (midnight)
- Sensory overload responses (panic, shaking, confusion)
- Unsafe interruptions during driving
- Elders relying on radio or TV, not smartphones

245. Newcomers and ESL speakers also struggle with comprehension.

246. The alerts must be **plain-language, structured, multilingual, and accessible.**

9.6 Individual Canadians Provide Critical Real-World Evidence

247. Dozens of individuals filed direct accounts of the following issues:

- Missed alerts** ✘
- Alerts that arrived late or to the wrong region** ✘
- Alerts too loud (dangerous for hearing-aid users)** ✘
- Alerts too quiet or no vibration** ✘
- Alerts creating panic while driving** ✘
- Alerts waking infants, seniors with cardiac conditions** ✘
- Alerts creating PTSD-like responses** ✘
- Alerts in English only where French or Indigenous languages were needed** ✘
- Alerts confusing or impossible to read** ✘
- Alerts received with no actionable instruction** ✘

248. These lived experiences highlight the state of safety for Canadians today - not the idealized model described by large carriers and broadcasters.

249. This evidence cannot be dismissed.

9.7 Streaming Platforms Leave Millions Without Alerts

250. PIAC, CCC, FRPC, OLA, and many individuals confirm:

- Streaming services currently receive Zero alerts.** ✓
- Many households are “cord-cutters” and depend entirely on apps.** ✓
- Newcomers and Deaf/DeafBlind users often rely exclusively on streaming.** ✓

251. This is a **major national safety gap.**

252. The Broadcasting Act now applies to online undertakings. Streaming platforms must be part of NPAS modernization to protect:

- Deaf & DeafBlind
- Francophones
- Indigenous-language speakers
- Seniors
- Rural residents
- Urban households without cable

9.8 Public Trust Has Eroded - NPAS Must Address This

254. The record shows widespread **loss of public confidence** due to:

- over-alerting at night
- irrelevant alerts
- non-local alerts
- alerts that cause distress
- unreadable instructions
- contradictory provincial/federal alerts
- severe tone intensity
- repeated failures during disasters

255. Public trust is essential for compliance during emergencies.

256. Accessible, multilingual, plain-language, and correctly geo-targeted alerts **increase trust**.

9.9 Public Safety Requires an Accessible, Redundant, Multi-Platform NPAS

257. Based on the record:

- a. Wireless-only NPAS is unsafe ✓**
- b. Broadcast-only NPAS is insufficient ✓**
- c. App-based NPAS cannot be the sole fallback ✓**
- d. Indigenous communities require linguistic and governance inclusion ✓**
- e. Deaf, DeafBlind, HoH communities require multi-sensory alerts ✓**
- f. Francophones require simultaneous bilingual content ✓**
- g. Seniors require simplified, plain-language templates ✓**
- h. Rural areas need redundant pathways (radio, ATSC 3.0, apps) ✓**
- i. Vulnerable communities need comprehension, not volume ✓**

258. A modern NPAS must therefore integrate:

- Wireless
- Broadcast (TV, radio, ATSC 3.0)
- Streaming / online undertakings
- National alert app
- Indigenous partners
- Sign-language content
- Multilingual templates
- Redundancy standards
- Accessibility-by-design requirements

259. Public safety demands nothing less.

Section 9 Conclusion

260. The lived experiences documented on the public record - across wildfires, floods, outages, evacuations, and false or mistargeted alerts - show that Canada's emergency alerting system is **not working for everyone**, and is especially failing the most vulnerable.

261. The Commission must modernize NPAS to:

- address real-world failures,
- incorporate accessibility and linguistic rights,
- include redundancy and multi-platform distribution,
- and ensure alerts are accessible, intelligible, actionable, and reliable for all Canadians.

262. DWCC urges the Commission to make public safety - not industry convenience - the central priority of NPAS modernization.

DWCC Reply - Section 10: Consolidated Recommendations (NPAS Modernization)

A Modern, Accessible, Multilingual, and Redundant Emergency Alerting Framework for Canada

263. Based on the complete public record of TBNC CRTC 2025-180, DWCC submits the following **Consolidated Recommendations** to guide the Commission's modernization of the National Public Alerting System (NPAS). These recommendations are grounded in:

- The Accessible Canada Act (ACA)
- TRP 2023-41 (Accessibility framework)
- The Broadcasting Act
- The Telecommunications Act

- The Online Streaming Act
- Provincial emergency management realities
- Lived experience of Deaf, DeafBlind, Hard-of-Hearing, Indigenous, Francophone, rural, senior, newcomer, and disabled Canadians
- Evidence from emergency authorities, Indigenous Nations, broadcasters, public interest groups, and individuals

264. These recommendations represent a **national safety baseline** and are consistent with the public interest, accessibility, reconciliation, and consumer-protection objectives.

10.1 Establish a Multi-Modal, Redundant NPAS Delivery System

265. DWCC recommends the Commission require NPAS support across **all major communication pathways**:

- Wireless Public Alerting (WPA) ✓**
- Broadcasting (TV, radio, ATSC 3.0 / NextGen TV) ✓**
- Online undertakings / streaming platforms ✓**
- A national accessible alert app (Wi-Fi capable) ✓**
- Satellite and community broadcasting (where feasible) ✓**

266. Rationale: Wireless-only alerting is unsafe and fails repeatedly during real emergencies (wildfires, floods, outages). Redundancy is a **public-safety requirement**.

10.2 Mandate ASL, LSQ, and Indigenous Sign Language Alerting

267. For all **Level 5 intrusive alerts**:

- Mandatory ASL & LSQ sign-language windows on broadcast platforms ✓**
- ASL/LSQ video assets attached to wireless and app-based alerts ✓**
- Indigenous Sign Language (ISL) support where regional capacity exists ✓**
- National ASL/LSQ template library for rapid deployment ✓**
- Broadcasters required to follow CLF-Accessibility (CLF-A) layout rules ✓**
- LMDs required to carry ASL/LSQ assets ✓**

268. Sign-language access is not optional - it is a legal accessibility requirement.

10.3 Mandate Bilingual and Multilingual Alerts

269. DWCC recommends:

- Mandatory Simultaneous French and English display ✓**
- Mandatory LSQ-aligned French text ✓**
- Mandatory support for Indigenous languages where EMOs provide them ✓**

- d. **Support for high-frequency newcomer languages via template bank** ✓
- e. **Plain-language requirement for all alerts (Grade 6 reading level)** ✓

270. Rationale: Linguistic exclusion is a **safety risk**, and is documented across OLMC, Indigenous, and newcomer communities.

10.4 Adopt the DeafBlind Emergency Alerting Framework (DB-EAF)

271. DWCC recommends:

- a. **National haptic alert pattern (long-short-short cycle)** ✓
- b. **Persistent vibration cycles until user acknowledgment** ✓
- c. **CAP payloads compatible with braille displays** ✓
- d. **Screen-reader metadata for alert title & instructions** ✓
- e. **High-contrast visual modes** ✓
- f. **No timed dismissal** ✓
- g. **Plain-language structure with structured location cues** ✓
- h. **Sign-language integration linked to haptic triggers** ✓

272. DeafBlind Canadians currently face **the highest alerting barriers** and require multi-sensory access.

10.5 Require Emergency Alerts on Streaming Platforms (Online Undertakings)

273. DWCC recommends:

- a. **CAP overlays on streaming services (Netflix, YouTube, Prime, Disney+, etc.)**
- b. **ASL/LSQ video or link to accessible emergency stream**
- c. **Device-level haptic and braille support in apps**
- d. **Mandatory participation under the Online Streaming Act**

274. Streaming platforms are the **largest unprotected gap** in NPAS today.

10.6 Mandate ATSC 3.0 Emergency Datacasting

275. DWCC recommends:

- a. **ATSC 3.0 emergency alert carriage requirements ✓**
- b. **Support for images, maps, shelter instructions ✓**
- c. **ASL/LSQ & multilingual payloads ✓**
- d. **Backwards compatibility where possible ✓**
- e. **Pilot projects with community and Indigenous broadcasters ✓**

276. ATSC 3.0 provides essential **broadcast redundancy** when wireless networks collapse.

10.7 Maintain 3G WPA During Transition

277. Contrary to carrier claims, DWCC recommends:

- a. Continued support for 3G alerting until full rural LTE coverage is verified ✓
- b. National audit of LTE availability ✓
- c. Rural & Indigenous exception policies ✓

278. Removing 3G WPA prematurely is a **direct safety threat** for rural, remote, low-income, and Indigenous communities.

10.8 Create a Multilingual, Accessible National Template Library

279. DWCC recommends:

- a. **Pre-translated evacuation & hazard templates ✓**
- b. **Languages: FR, EN, Cree, Dene, Inuktitut, Michif, newcomer languages ✓**
- c. **LSQ-structured French text & ASL-structured English text ✓**
- d. **Plain-language, icon-based instructions ✓**
- e. **Template co-development with DWCC, CDGM, FCFA, JBCCS, DeafBlind communities ✓**
- f. **Annual testing and updates ✓**

280. This reduces EMO workload and standardizes accessible alerting across Canada.

10.9 Require Accessibility & Usability Testing with Persons with Disabilities

281. DWCC recommends:

- a. **Mandatory accessibility testing for all NPAS updates ✓**
- b. **Deaf, DeafBlind, HoH, Blind, mobility, cognitive, and senior testers ✓**

- c. **Annual Accessibility Compliance Report (TRP 2023-41) ✓**
- d. **EMOs and carriers must consult disability communities before major changes ✓**
- e. **Public scorecard of NPAS accessibility outcomes ✓**

282. Accessibility cannot be an afterthought.

10.10 Strengthen NPAS Governance, Accountability & Transparency

283. DWCC recommends:

- a. **NPAS governance include Indigenous Nations, broadcasters, accessibility experts ✓**
- b. **Public reporting on alert failures, geo-targeting accuracy, redundancy performance ✓**
- c. **A national incident reporting tool for missed alerts ✓**
- d. **Formal alignment with the CRTC's resiliency proceeding (TNC 2025-226) ✓**
- e. **Enforcement tools (conditions of service, mandatory testing, AMPs) ✓**

284. Emergency alerting must be **transparent, measurable, and accountable**.

10.11 Support Community & Indigenous Broadcasters as Essential Safety Infrastructure

285. DWCC recommends:

- a. **Dedicated funding for community/Indigenous radio ✓**
- b. **Support for Indigenous-language alerting ✓**
- c. **Support for ATSC 3.0 community transmitters ✓**
- d. **Inclusion of Indigenous broadcasters in NPAS decision-making ✓**
- e. **Required CAP distribution for Indigenous and OLMC radio networks ✓**

286. Community and Indigenous broadcasters fill alerting gaps where national systems fail.

10.12 Adopt Clear, Accessible national Alert Presentation Standards

287. DWCC recommends:

- a. **CLF-A mandates applied to all alerts (contrast, font, layout) ✓**
- b. **Plain language rules ✓**
- c. **Uniform headline + instruction structure ✓**
- d. **Standard set of emergency icons ✓**
- e. **Bilingual default display ✓**

- f. Integration of haptic + visual accessibility ✓
- g. Mandatory ASL/LSQ visual zone ✓

288. This ensures consistent, readable, and inclusive presentation across all platforms.

Section 10 Conclusion

289. The evidence on the record shows that Canadians need a national alerting system that is:

- a. Accessible ✓
- b. Multilingual ✓
- c. Multi-platform ✓
- d. Resilient ✓
- e. Inclusive of Indigenous languages ✓
- f. Inclusive of sign languages ✓
- g. Designed for Deaf, DeafBlind, HoH, and vulnerable users ✓
- h. Capable of functioning during outages and disasters ✓
- i. Clear, accurate, and trustworthy ✓

290. Only a **modern, accessibility-centered, redundant NPAS** can meet these public-safety needs.

291. DWCC urges the Commission to adopt the recommendations above as the core of a reformed and future-ready national public alerting system.

DWCC Reply - Conclusion

Toward a Modern, Accessible, Redundant, and Inclusive National Public Alerting System

292. The public record in this proceeding demonstrates a simple truth:

293. Canada's current emergency alerting system does not reach everyone who needs it, and it does not communicate clearly or accessibly to those who receive it.

294. Wireless Public Alerting alone cannot safeguard Canadians during wildfires, floods, storms, telecom outages, rural coverage gaps, or climate-driven emergencies. The record contains extensive and consistent evidence from:

- **Emergency authorities** (BC EMCR, Alberta AEA, City of Calgary)
- **Indigenous Nations and broadcasters** (JBCCS, ECN, First Mile, ARCQ)
- **Francophone and OLMC organizations** (FCFA, ACFA, SFM)
- **Accessibility and disability groups** (DWCC, CDGM, DHHC, Neil Squire Society, Audition Québec)
- **Public-interest organizations** (PIAC, FRPC, CACTUS, CCC, OLA)
- **Municipal & provincial governments** (RMA, SARM, Calgary)
- **Hundreds of individual Canadians**

295. These groups all reach the same conclusion: **alerts must be accessible, multilingual, multi-platform, redundant, and usable by the full diversity of Canadians.**

296. Only a small subset of large carriers and broadcasters oppose improvements, providing no accessibility analysis, no evidence to support the status quo, and no justification under the Accessible Canada Act or TRP 2023-41. Their submissions minimize real-world failures and overlook the lived experience of persons with disabilities, Indigenous Nations, Francophone minorities, rural and remote populations, seniors, and newcomers.

297. The Commission cannot build a national safety system around the *least inclusive* voices in the record.

Accessibility Is a Public-Safety Imperative

298. For Deaf, DeafBlind, and Hard-of-Hearing Canadians, and for many disabled, multicultural, and Indigenous users, current alerts are:

- inaudible,
- unreadable,
- mis-targeted,
- inaccessible,
- linguistically inappropriate, or
- completely absent during network outages.

299. When accessibility fails, **public safety fails.**

300. When communication breaks down, **lives are put at risk.**

301. A modern NPAS must ensure that every person - regardless of disability, language, device, region, or connectivity - can receive, perceive, understand, and act on an alert.

Redundancy Is Required for Reliability

302. The record confirms this principle unambiguously:

303. If one communication pathway fails, another must be available.

304. A future-proof NPAS requires integrated alert delivery through:

- wireless (WPA),
- broadcasting (TV, radio, ATSC 3.0),
- streaming / online undertakings,
- a fully accessible national alert app,
- Indigenous and community media, and
- optional satellite channels.

305. Redundancy is not “extra.”

306. It is a *safety requirement*, especially for rural, Indigenous, northern, and DeafBlind communities.

Multilingual & Sign-Language Alerting Save Lives

307. Alerts must be understandable at the moment of crisis.

308. The record shows that:

- Francophones routinely receive English-only alerts;
- Indigenous communities do not receive alerts in their own languages;
- ASL/LSQ content is not provided during emergencies;
- newcomers and ESL speakers cannot understand complex English alert text;
- DeafBlind Canadians cannot access audio-only or text-only alerts.

309. Canada’s diversity must be reflected in Canada’s emergency system.

310. A modern NPAS must include:

- **simultaneous English + French,**
- **LSQ + ASL windows,**
- **Indigenous languages where provided,**
- **plain-language templates,**
- **multilingual CAP payloads, and**
- **accessible sign-language-aligned text.**

A Modernized NPAS Must Be Built on Accessibility, Safety, Equity & Resiliency

311. DWCC urges the Commission to adopt a national framework that:

- eliminates accessibility barriers under the ACA,
- reflects lived experience of vulnerable communities,
- incorporates resiliency findings from TNC 2025-226,
- supports Indigenous self-determination in alerting,
- enables broadcasters and online undertakings to fulfill safety obligations,
- ensures wireless carriers meet public-safety responsibilities,
- requires streaming platforms to participate in NPAS,
- protects all Canadians through redundancy and multi-modal design.

313. These outcomes are not aspirational - they are **essential**.

DWCC's Final Position

314. DWCC respectfully submits that the Commission must implement a **comprehensive modernization** of the National Public Alerting System that:

- centers accessibility,
- supports multilingual and sign-language communication,
- prioritizes DeafBlind multi-sensory access,
- strengthens public safety for Indigenous and rural communities,
- mandates redundancy across all platforms,
- ensures alert comprehension for all linguistic groups,
- broadens participation to include online undertakings and community media,
- and meets the communication needs of every Canadian - without exception.

315. Canada's emergency alerting system must be **built for everyone**, not only those who can hear, see, speak, or read in the dominant language during ideal communication conditions.

316. DWCC appreciates the opportunity to contribute to this critical public-safety proceeding and remains committed to working with the Commission to ensure that **no one is left behind** in Canada's emergency communications system.

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