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**VIA EMAIL DISTRIBUTION and GC KEY**

January 28, 2026

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

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

Dear Secretary General,

**Re: [TBNC CRTC 2025-180](#) - Improving the Public Alerting System - **Final Written Reply****

On behalf of the Deaf Wireless Canada Consultative Committee (DWCC), please find attached our Final Written Submission in respect of Telecom and Broadcasting Notice of Consultation CRTC 2025-180 and Notice of Consultation CRTC 2025-180-1, Improving the Public Alerting System.

This submission synthesizes the evidentiary record of the proceeding and responds to interventions and reply comments, without introducing new evidence. It is filed in accordance with the Commission's procedural directions for the final written phase of this consultation.

Should you require any additional information or clarification, please do not hesitate to contact me.

Respectfully submitted,

Jeffrey Beatty  
Chairperson  
Deaf Wireless Canada Consultative Committee (DWCC)

## **I. Introduction**

**1.** DWCC files these Final Written Submissions in response to Telecom and Broadcasting Notice of Consultation CRTC 2025-180 and the related procedural notice CRTC 2025-180-1 concerning improvements to Canada's public alerting system.

**2.** DWCC participates as a Deaf-led national consumer organization focused on telecommunications and digital accessibility for Deaf, DeafBlind, and Hard of Hearing Canadians. Our submissions are intended to assist the Commission by consolidating and organizing the evidentiary record of this proceeding into clear findings and determinations that support effective, equitable life-safety alerting.

**3.** DWCC introduces no new evidence. These submissions synthesize the existing record, including interventions and reply comments, to: (a) identify what the record establishes as fact; (b) clarify the key disputes and gaps that remain unresolved; and (c) frame the determinations required to ensure that the National Public Alerting System (NPAS) delivers accessible, effective, and timely alerts to all Canadians, including persons with disabilities.

## **II. The Central Issue Before the Commission**

**4.** The record demonstrates that the core issue before the Commission is no longer whether accessibility barriers exist within NPAS, or whether improvements are technically possible. The record confirms persistent accessibility failures in the delivery and usability of alerts for Deaf, DeafBlind, and Hard of Hearing Canadians.

**5.** The central issue is whether the Commission will treat accessibility as a mandatory public-safety outcome-supported by clear, enforceable requirements and accountability-or whether NPAS will continue to rely on discretionary, inconsistent, and fragmented approaches that do not deliver equivalent access in practice.

**6.** The record confirms that accessibility failures within NPAS are foreseeable, ongoing, and preventable. Accordingly, the Commission's determinations must focus on outcomes: ensuring that alerts are accessible, understandable, and usable under real emergency conditions, with clear end-to-end responsibility across the alerting chain.

**7.** In assessing these issues, the Commission must also ensure that its determinations are consistent with its own Strategic Plan and statutory mandate. The Commission has committed to ensuring that Canadians can access world-class communications services, that the communications system serves the public interest, and that regulation delivers effective, evidence-based outcomes. Accessibility is integral to each of these commitments. Where public alerts are not functionally accessible and usable by Deaf, DeafBlind, or Hard of Hearing Canadians under real emergency conditions, these strategic outcomes are not met, and the Commission's mandate is not fulfilled.

### **III. Findings Established on the Record**

**8.** The record establishes that accessibility within the National Public Alerting System (NPAS) is not a secondary or optional feature, but a condition of meaningful access to life-saving information. Alerts that rely exclusively on audio signals or dense, rapidly scrolling text fail to provide effective access for many Deaf, DeafBlind, and Hard of Hearing Canadians during time-critical emergencies.

**9.** The record demonstrates that Deaf-led organizations (DWCC, CDGM, DHH Coalition) consistently identify the absence of American Sign Language (ASL), Langue des signes québécoise (LSQ), and DeafBlind-accessible formats within the National Public Alerting System (NPAS) as a fundamental accessibility failure. These parties emphasize that alerts delivered solely through audio or written text do not provide equitable or independent access for many Deaf, DeafBlind, and Hard of Hearing Canadians during emergencies.

**10.** The record further establishes that American Sign Language (ASL) and Langue des signes québécoise (LSQ) are primary languages for many Deaf Canadians. Alerts that exclude these languages do not provide equivalent access, particularly where comprehension, urgency, and situational awareness are required in seconds rather than minutes. The absence of signed alerting is therefore an accessibility failure, not merely a usability preference.

**11.** The evidence demonstrates that DeafBlind Canadians face distinct and compounded barriers within NPAS. Effective alerting for DeafBlind persons requires intentional design choices, including visual clarity, alert persistence beyond the initial display, replayability, compatibility with assistive technologies, and, where applicable, tactile or haptic modalities. These requirements are not incidental; they are necessary to ensure that alerts can be perceived, understood, and acted upon.

**12.** Public-interest and consumer intervenors (PIAC, FRPC, Consumers Council, and the National Indigenous organizations where relevant) broadly agree that accessibility barriers persist within NPAS and that voluntary or informal approaches have not reliably delivered equitable outcomes. Several parties emphasize the Commission's responsibility to ensure accountability, transparency, and outcome-based regulation where public alerting fails to function effectively in real-world conditions.

**13.** The record confirms that existing alerting practices frequently assume ideal conditions—stable power, uninterrupted connectivity, and unimpaired sensory access. These assumptions do not reflect real emergency conditions and disproportionately disadvantage persons with disabilities, particularly during disasters involving infrastructure disruption.

**14.** The record also establishes that accessibility gaps are systemic rather than isolated. They arise from the combined effects of alert origination practices, formatting standards, distribution pathways, device behaviour, and governance arrangements. As a result, no single actor currently bears end-to-end responsibility for ensuring that alerts are accessible in practice.

**15.** While many public-interest submissions support broader inclusion and system improvement, they generally frame accessibility as a matter of usability, modernization, or system performance. By contrast, Deaf-led evidence on the record establishes that linguistic accessibility is a prerequisite for independent access to life-saving information and must be addressed through targeted, enforceable measures rather than discretionary or facilitative approaches.

**16.** Taken together, the evidence supports the conclusion that accessibility failures within NPAS are predictable, repeatable, and correctable through clear, outcome-based requirements. Incremental or voluntary measures have not delivered equitable access, and the record does not support continued reliance on discretionary compliance. These findings support the Commission's formal findings on accessibility as a life-safety requirement and the systemic nature of current NPAS deficiencies.

**17.** The record further reflects agreement among public-interest and accessibility intervenors that language accessibility in public alerting is a public-safety requirement rather than a matter of programming choice or consumer preference, and that effective alerting cannot be limited to English and French alone. Deaf-led evidence on the record, including DWCC's national survey, demonstrates strong support among Deaf, DeafBlind, and Hard of Hearing respondents for federal requirements to include sign-language access within public alerts. This evidence reinforces the conclusion that linguistic accessibility is foundational to equitable and effective public alerting.

**18.** The record reflects agreement among consumer and public-interest intervenors that ensuring the availability of public alerts in languages other than English and French requires coordinated engagement with Indigenous communities, accessibility groups, and last-mile distributors. This evidence supports the conclusion that effective language accessibility depends on inclusive system design and coordination across stakeholders to identify and address technical and accessibility barriers, thereby enhancing the reach and effectiveness of public alerting.

**19.** The record demonstrates convergence among consumer, accessibility, and Deaf-led intervenors in support of national standards and requirements to ensure sign-language inclusion and broader accessibility within the National Public Alerting System. Submissions from accessibility organizations and consumer advocates identify persistent accessibility barriers and emphasize that accessibility must be treated as a basic performance requirement of the alerting system, rather than as a supplementary or optional feature. This evidence supports the conclusion that enforceable standards are necessary to ensure consistent and equitable access to public alerts.

#### **IV. Governance and Accountability**

**20.** The record establishes that governance of the National Public Alerting System (NPAS) is fragmented across multiple actors, including alert originators, system operators, broadcasters, telecommunications service providers, device manufacturers, and platform ecosystems. While

each participant performs a defined function, no entity is clearly responsible for ensuring that alerts are accessible end-to-end.

**21.** This fragmentation results in accountability gaps where accessibility failures can occur without remediation. Alert originators may assume that accessibility is addressed at the distribution or device level; distributors may rely on upstream formatting; and device or platform providers may treat accessibility as optional or outside regulatory scope. The record demonstrates that these assumptions routinely result in inaccessible alerts reaching end users.

**22.** The evidence further establishes that existing governance frameworks rely heavily on guidance, best practices, and voluntary coordination rather than enforceable requirements. These approaches have not produced consistent accessibility outcomes and do not provide the Commission with effective tools to monitor compliance or address failures when they occur.

**23.** The record confirms that persons with disabilities are disproportionately affected by this lack of accountability. When alerts fail, there is no clear mechanism to identify responsibility, require corrective action, or ensure that future alerts are accessible. This undermines confidence in NPAS as a life-safety system and places Deaf, DeafBlind, and Hard of Hearing Canadians at increased risk.

**24.** The evidence supports the conclusion that effective public alerting requires clear, outcome-based accountability that spans the full alerting chain. Without explicit Commission determinations assigning responsibility for accessibility outcomes, NPAS will continue to produce inconsistent and inequitable results. These governance failures support the need for explicit Commission determinations assigning end-to-end accountability for accessibility outcomes, consistent with the Commission's statutory mandate and its Strategic Plan commitment to effective, accountable regulation in the public interest.

**25.** The record reflects that some telecommunications service providers acknowledge the existence of accessibility barriers identified by Deaf-led and disability organizations, but assert that responsibility for addressing those barriers lies with alert originators, standards-setting bodies, or device ecosystems rather than with network operators. This position underscores the fragmentation of responsibility within the current governance framework and reinforces the absence of end-to-end accountability for accessibility outcomes.

**26.** The record also reflects acknowledgement by system participants that accessibility improvements must be prioritized and implemented on an ongoing basis. Evidence from Deaf-led submissions indicates that many Deaf, DeafBlind, and Hard of Hearing users require the ability to review past public alerts and to provide feedback on alert effectiveness through accessible mechanisms. These features support persistence, comprehension, and accountability, and are relevant to ensuring that public alerts remain usable and effective beyond initial transmission, particularly under real emergency conditions.

## **V. Redundancy and Resilience**

**27.** The record establishes that emergencies frequently disrupt the very infrastructure on which public alerting depends, including electrical power, cellular networks, broadband connectivity, and broadcast transmission. A public alerting system that relies on a single delivery pathway cannot be considered resilient or reliable under real-world emergency conditions.

**28.** The evidence demonstrates that single-path alerting models disproportionately disadvantage persons with disabilities. When one modality fails - such as audio alerts, broadcast reception, or mobile data - Deaf, DeafBlind, and Hard of Hearing Canadians are often left without any effective alternative. Redundancy is therefore not only a system reliability requirement, but an accessibility requirement.

**29.** The record confirms that effective public alerting requires multiple, complementary delivery pathways, including wireless, broadcast, and internet-based mechanisms, with alerts designed to persist, repeat, and remain accessible as conditions evolve. Alerts must reach users even when they are displaced, offline, or using assistive technologies.

**30.** The record further reflects concern among public-interest intervenors (FRPC and PIAC) that existing public alert testing and monitoring practices do not provide sufficient transparency or evidence to confirm that alerts are accessible and effective in practice. These concerns support the need for outcome-based accountability mechanisms rather than reliance on assumed system performance.

**31.** The record further demonstrates that reliance on Wireless Public Alerting alone cannot ensure universal or equitable access to emergency information. Evidence from public-interest and accessibility intervenors indicates that many Canadians do not consistently receive wireless alerts and that significant segments of Deaf, DeafBlind, and Hard of Hearing communities rely on alternative pathways, including broadcasting services, internet-based communications, government messaging, emergency alert applications, and social media. This evidence reinforces the importance of multiple, accessible, and redundant emergency communication channels, integrating broadcasting, wireless, and online pathways to ensure effective public alerting under real-world conditions.

**32.** The evidence further establishes that redundancy must be planned and enforced at the system level. Leaving redundancy to individual actors or user choice results in uneven coverage and inconsistent outcomes. A life-safety system requires coordinated, mandated redundancy that anticipates failure rather than reacting to it.

**33.** The record supports the conclusion that resilience within NPAS depends on both technical redundancy and accessible design. Without both, the system cannot reliably serve all Canadians during emergencies, particularly those most at risk of exclusion. The evidence, therefore, supports mandatory, system-level redundancy requirements as a condition of resilient and accessible public alerting.

## **VI. Wrap Up**

**34.** The record of this proceeding establishes that accessibility within the National Public Alerting System (NPAS) is a core public-safety requirement. Where alerts are inaccessible, the system fails to deliver life-saving information to all Canadians, undermining its fundamental purpose.

**35.** The evidence confirms that accessibility barriers affecting Deaf, DeafBlind, and Hard of Hearing Canadians are well-documented, foreseeable, and preventable. Continued reliance on discretionary, voluntary, or fragmented approaches has not delivered equitable access and is not supported by the record.

**36.** The Commission is therefore required to move beyond guidance and encouragement toward enforceable, outcome-based requirements that ensure alerts are accessible, understandable, and usable under real emergency conditions. Public alerting cannot be treated as technology-neutral in circumstances where accessibility exclusions are known and persistent. Failure to do so would not only perpetuate known accessibility harms but would be inconsistent with the Commission's own commitments to public safety, accessibility, and effective regulation as articulated in its Strategic Plan.

**37.** Effective public alerting requires clear end-to-end accountability for accessibility outcomes, coordinated governance across all participants in the alerting chain, and mandatory redundancy to ensure resilience during infrastructure disruption.

**38.** Taken together, the record demonstrates convergence among Deaf-led and public-interest organizations that accessibility within NPAS must be treated as a core public-safety outcome, supported by enforceable requirements and clear accountability, rather than by voluntary guidance or discretionary implementation.

**39.** Accordingly, DWCC submits that the record supports the adoption of formal Commission findings and determinations that embed accessibility, accountability, and redundancy as enforceable elements of the National Public Alerting System.

## **VII. Findings**

**F1.** The Commission finds that accessibility is a necessary condition for the National Public Alerting System (NPAS) to function as a life-safety service. Alerts that cannot be perceived, understood, or acted upon by persons with disabilities do not provide meaningful access.

**F2.** The Commission finds that current public alerting practices do not provide equivalent access for Deaf, DeafBlind, and Hard of Hearing Canadians, particularly where alerts rely on audio-only cues or dense text without accessible alternatives.

**F3.** The Commission finds that American Sign Language (ASL) and Langue des signes québécoise (LSQ) are primary languages for many Deaf Canadians, and that the absence of signed alerting constitutes an accessibility gap rather than a discretionary enhancement.

**F4.** The Commission finds that DeafBlind Canadians face distinct accessibility barriers requiring explicit design considerations, including visual clarity, persistence, replayability, and compatibility with assistive technologies.

**F5.** The Commission finds that accessibility failures within NPAS are systemic and arise from fragmented governance across alert originators, system operators, distributors, and device or platform ecosystems.

**F6.** The Commission finds that no single entity currently bears clear end-to-end responsibility for ensuring that alerts are accessible in practice, resulting in accountability gaps and inconsistent outcomes.

**F7.** The Commission finds that emergencies frequently disrupt infrastructure relied upon for alert delivery, and that single-path alerting models are incompatible with resilient, inclusive public safety objectives.

**F8.** The Commission finds that voluntary guidance and best-practice approaches have not delivered consistent accessibility outcomes and are insufficient to address the established deficiencies in NPAS.

## **VIII. Determinations**

**D1.** The Commission determines that accessibility outcomes must be treated as mandatory requirements within the National Public Alerting System, rather than as optional or discretionary features.

**D2.** The Commission determines that public alerts must be designed and delivered in formats that are accessible to Deaf, DeafBlind, and Hard of Hearing Canadians, including consideration of signed languages and DeafBlind accessibility requirements.

**D3.** The Commission determines that responsibility for accessibility outcomes must be clearly assigned across the alerting chain, with end-to-end accountability to ensure alerts are accessible in practice.

**D4.** The Commission determines that outcome-based accessibility requirements are necessary to enable monitoring, compliance, and corrective action where accessibility failures occur.

**D5.** The Commission determines that NPAS must incorporate mandatory redundancy across multiple alerting pathways to ensure resilience during infrastructure disruption and emergency conditions.

**D6.** The Commission determines that public alerting cannot be treated as technology-neutral where known accessibility exclusions persist and where technical solutions are feasible.

#### **IV. Conclusion**

**40.** The record demonstrates with clarity that accessibility within Canada's National Public Alerting System is inseparable from public safety. When alerts exclude or fail to reach segments of the population, particularly Deaf, DeafBlind, and Hard of Hearing Canadians, the system does not merely fall short of best practice; it fails in its fundamental life-saving purpose. Accessibility is therefore not an aspirational feature but a core operational requirement of any credible alerting framework.

**41.** For more than a decade, accessibility has been identified as a persistent gap within NPAS. The evidence before the Commission confirms that these shortcomings are foreseeable, preventable, and well within the Commission's capacity to correct through enforceable regulation. Continued reliance on voluntary measures risks perpetuating cycles of inaccessibility and inconsistent protection during emergencies, outcomes that are incompatible with the Commission's public safety and accessibility mandates.

**42.** Now is the moment for transformation. By embedding accessibility, accountability, and redundancy as mandatory pillars of NPAS, the Commission can ensure that alerts reach every Canadian with the urgency, clarity, and usability required under real emergency conditions. Doing so would not only fulfill the obligations of the Accessible Canada Act and the Canadian Telecommunications Policy objectives, but also set a national benchmark for inclusive and resilient public alerting.

**43.** This proceeding presents an opportunity to align public alerting with the values of equity, safety, and shared responsibility that underpin Canada's communication system. Implementing enforceable accessibility requirements, grounded in outcome-based standards and supported by transparent accountability, will strengthen the integrity of NPAS and reaffirm the Commission's leadership in shaping a telecommunications system that serves all Canadians, without exception.

**44.** DWCC respectfully calls on the Commission to take decisive regulatory action to embed accessibility as a guaranteed element of public alerting. Only through clear accountability, enforceable requirements, and coordinated governance can Canada realize a truly inclusive NPAS, one that ensures no Canadian is left without access to life-saving information when it matters most, just as our [\*No One Left Behind\*](#) report exemplifies.

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