



Emergency Management Office

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Marian F. Tyson, Q.C.
Chief Executive Officer

December 3, 2010

Mr. Robert Morin
Secretary General
Canadian Radio-Television and Telecommunications Commission
Ottawa, Ontario K1A 0N2

Dear Mr. Morin:

Re: Broadcasting Notice of Consultation CRTC 2010 -826;
Application CRTC #2010-1511-5 by Pelmorex Communications Inc.

1. The Nova Scotia Emergency Management Office is pleased to provide this letter of comment on the above noted application. We understand that this application is to renew Pelmorex Communications Inc.'s (PCI) current broadcast licence and to extend the mandatory distribution order to 2018, in order to coincide with the expiration date for a renewed licence.
2. We are pleased to note that PCI has built, as directed, the framework for a voluntary broadcast alerting system in Canada, the National Alerting and Aggregation Service (NAADS). We believe NAADS will fulfill an important role in protecting our citizens. Full broadcaster participation has yet to be realized, but we are optimistic (based on local discussions) that there are no insurmountable obstacles to meeting that objective.
3. We note that PCI, as part of its' basis for requesting a longer renewal term for its' licence, has pointed out that the users of NAADS will benefit from an increased sense of continuity and certainty. We note also that PCI has stated that without the benefit of the mandatory order to ensure that the Weather Network remains on basic cable, PCI's continuation of NAADS would not be affordable.
4. As an early adopter of NAADS, we believe it will take several years at best, for the service to evolve to its' fullest potential in serving the emergency alerting needs of the public. We suggest that a longer term approach is essential to building and sustaining the critical mass, both in terms of users and broadcasters necessary to make this initiative a true success.
5. Our province is particularly proud of our leadership position in public alerting, and as such, we are currently involved in a field trial with radio stations testing broadcast intrusive equipment. The acquisition of this equipment will require a financial investment and the expectation is that the return on this investment will be spread out over many years. This is only one of several reasons why the long term viability of the NAADS' service must be front

and center on the minds of the Commission in ensuring that PCI has the revenue they require to continue supporting NAADS over the long term.

6. We would be remiss if we did not point out, that with much work completed, there is still much work to be done in public alerting in Canada, not only by PCI but by users and broadcasters alike. Clearly, the efforts of all parties would be best served by a decision in this matter which does nothing to compromise PCI's ability to continue supporting the National Alerting and Aggregation Service.

In closing, we note that at the public hearing the Commission will examine, among other things, the effectiveness of the NAADS' system to determine whether further action is required to ensure that Canadians receive timely warnings of imminent perils. We look forward to the opportunity to attend the hearing and provide the Commission with the information it needs to complete its' examination.

Yours very truly,



Marian F. Tyson, Q.C.
Chief Executive Officer
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cc: Paul Temple, Pelmorex Communications Inc.