

An application by Pelmorex Communications Inc.
for digital basic carriage of
The Weather Network and MétéoMédia
under Section 9 (1) (h) of the
Broadcasting Act

December 3, 2007

Executive Summary

In this application, Pelmorex Communications Inc. is requesting that the Commission ensure that Canadian cable and DTH consumers continue to have widespread, affordable and convenient access to severe weather forecasts, emergency alerts, environmental information and other unique public safety information programming that is broadcast on The Weather Network and MétéoMédia by approving this application for digital basic carriage under section 9(1)(h) of the *Broadcasting Act*.

Pelmorex proposes, as part of this application, to enable the voluntary broadcast of emergency alerting system envisioned by the Commission in Broadcasting Public Notice CRTC 2007-20 by performing the critical missing functions of a national public alerting aggregator and backbone network distributor. In doing so, Pelmorex will enhance the current alerting mandate of The Weather Network and MétéoMédia by providing a 24/7 alerting operations center that would aggregate and authenticate alerts from all three levels of government. Pelmorex will broadcast these alerts on The Weather Network and MétéoMédia and will also make them available to every broadcaster, distributor and media outlet that chooses to participate in a national voluntary alerting system.

Our proposed alerting system would meet all CANALERT standards and protocols and be open and non-proprietary, allowing distributors and last-mile information providers to use the equipment and software they deem most appropriate to identify and redistribute alerts. This life-saving service would be provided at no increase in our current basic wholesale rate with the continued distribution of The Weather Network and MétéoMédia on the basic service.

Strong support is already on the public record for both emergency alerting and the continued distribution of our weather networks on basic. More than 15,000 Canadians from nearly 1,000 communities wrote individual letters to support our previous application for digital basic carriage status. They provided eloquent testimony that many Canadians rely on The Weather Network and MétéoMédia as their only source of reliable, up-to-date local weather forecasts, environmental information and emergency alerts.

These views were amplified by dozens of national safety organizations and by farm groups representing more than 75,000 rural Canadians. Many submit that weather and safety information should be accessible to all, and not subject to premium pricing and packaging. They underline the exceptional importance of The Weather Network and MétéoMédia to the objectives of the *Broadcasting Act*, and fully demonstrate how we meet the criteria for digital basic carriage outlined by the Commission in Broadcasting Public Notice CRTC 2006-23. At a time when other national broadcasters have reduced local programming, Pelmorex has made local programming a priority, increasing the number of communities that receive unique local weather forecasts, alerts and environmental information and investing in new technologies to provide satellite subscribers with local information as well.

Approval of our application will ensure that Canadians have continued access to our services without any price increase, as well as greater access to life-saving emergency alerts through all media. Without the continued distribution of The Weather Network and MétéoMédia on basic in most markets, many Canadians will no longer have access to the vital local road safety and environmental information, weather forecasts and emergency alerts that we broadcast today, while others will have to pay substantially more to receive them on tiers or simply to keep them on their basic service.

The business case for The Weather Network and MétéoMédia depends on widespread carriage on basic. Without it, the quality of our services will be negatively affected and the cost of the services to some BDUs will have to increase significantly, with no corresponding benefit to consumers. In addition, denial of our application would inhibit the development of a national broadcast alerting system in Canada, as no other party has stepped forward to provide the critical alert aggregation and a national distribution network function at their own expense, and no government funding for such an initiative has been identified despite years of review.

If BDUs move our services to a discretionary tier or package, or force a lower wholesale fee for our services on basic, consumers are unlikely to receive any reduction in the price of the basic service, but they will inevitably experience a reduction in the quality of the service provided by The Weather Network and MétéoMédia. Even if, for example, a single major distributor moved The Weather Network from basic to a discretionary tier, the loss of subscription and advertising revenue would have a significant impact on our revenues. This would spell the end to the implicit cross subsidy that supports our current offer of the same quality of local service at a single low price to Canadians in every market across the country - French and English, rural and urban. We would need to selectively raise our rates where possible to reflect real costs and our new economic reality. Market forces would dictate higher rates for subscribers in smaller cities and towns, and to Canada's linguistic minorities.

In this environment, substantial programming and service cuts would be necessary, with a greater programming focus on large urban markets that are of the highest interest to advertisers. Our ability to continue to offer MétéoMédia in its current form would be threatened. Canadians who could not afford or were unwilling to pay for extended cable or satellite packages would lose ready access to our vital local weather, safety and environmental programming and to emergency alerts, which are not consistently available through any other broadcast media.

This application provides the details of our proposal to serve as a national emergency alert aggregator and network distribution system, and demonstrates how our services make an exceptional contribution to the objectives of the *Broadcasting Act*, fully meeting the Commission's criteria for digital basic carriage under section 9 (1) (h) of the *Act*. It sets out the benefits that Canadians would receive as a result of the continued widespread distribution of The Weather Network and MétéoMédia on the basic services of satellite, cable and wireless systems, and provides compelling evidence that our ability to continue to meet the needs of Canadians in every part of the country and to act as the national

emergency alert aggregator and distribution system are dependent on widespread digital distribution.

For these reasons, Pelmorex respectfully requests that the Commission issue a distribution order requiring each Direct-to-Home (DTH) satellite distribution undertaking and Class 1 terrestrial distribution undertaking to distribute, as part of the digital basic service, The Weather Network, if the BDU is operating in an Anglophone market, and MétéoMédia, if the BDU is operating in a Francophone market.

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1.0 Introduction

1. In Broadcasting Public Notice CRTC 2006-23, *Digital migration framework* (“PN 2006-23”), the Commission unveiled the framework that will guide the migration to a digital distribution environment of those pay and specialty television services that were licensed in an analog environment.
2. In the new digital framework, the Commission also set out criteria under which a service may apply for digital basic carriage status under section 9(1)(h) of the *Broadcasting Act*. The Commission recognizes in the Public Notice the value of having a basic service that ensures that all subscribers have access, at a reasonable price, to a core group of services that contribute significantly to furthering the objectives of the *Broadcasting Act*, as well as those objectives that relate to the reflection of Canada’s linguistic duality.
3. With this application, Pelmorex Communications Inc. (“Pelmorex”), the licensee of The Weather Network and MétéoMédia, is proposing to enable the voluntary emergency alerting system envisioned by the Commission in Broadcasting Public Notice 2007-20: *Emergency Alerting Systems* (“PN 2007-20”) by performing the critical missing functions of a national public alerting aggregator and network distributor. In doing so, Pelmorex undertakes to expand the scope of its current broadcasting undertaking, which broadcasts emergency alert messages, and provide those same alerts to every other broadcaster, distributor and media outlet that chooses to participate. We are asking the Commission to ensure widespread consumer access to broadcast emergency alerts and to the other unique safety information provided by our specialty television services as part of the digital basic service by issuing a distribution order under section 9(1)(h) of the *Broadcasting Act* in accordance with the requirements outlined in PN 2006-23.
4. The Weather Network and MétéoMédia provide much more than weather forecast services – we provide critical weather, environmental, road safety and public alerting information that is essential to the health and safety of Canadians and unavailable from other broadcast sources in most communities. In Broadcasting Decision CRTC 2007-246 (“Decision 2007-246”), the Commission denied our first application for digital basic carriage under section 9(1)(h), and incorrectly suggested that the information we provide is readily available elsewhere.
5. With this application we will demonstrate that other broadcasters and other types of Canadian media do not offer the same local, easily accessible, reliable and vital safety and environmental information that is provided to Canadians in every region of the country by our French and English-language specialty services. We will also demonstrate how our current mandate to deliver this kind of information programming will be augmented and enhanced through our proposal to take on the role of public alerting aggregator and backbone network distributor of the voluntary broadcast alerting system envisioned by the Commission in PN 2007-20.

6. The Canadian public's support for both a national emergency alerting system and for the continued carriage of The Weather Network and MétéoMédia on basic service is already on the public record.
7. In April 2006, some 700 Canadians wrote in support of our application for an All Channel Alert™¹ public alerting service, including associations with safety mandates, provincial governments, municipalities, federal MPs and Senators, and hundreds of concerned individuals². They were adamant that a broadcasting emergency alert service is urgently required. Among the groups lending their vocal support were the Canadian Centre for Emergency Management, the Canadian Red Cross, the Canadian Risks and Hazards Network, the Centre for Catastrophic Loss Reduction, the Canadian Safety Association, l'Association de Sécurité Civile du Québec, the Federation of Canadian Municipalities, le Bureau du Coroner du Québec, et la Fédération québécoise des municipalités. The Pelmorex proposal for an end-to-end alerting system was denied in favour of a voluntary approach in PN 2007-20. However, a voluntary system cannot proceed until a national public alerting aggregator and backbone network distributor is in place.
8. Pelmorex has also applied for digital basic carriage before. In March 2007, an overwhelming 15,000 Canadians from 1,000 different Canadian communities wrote individual letters to the Commission supporting our application for continued carriage on digital basic because they believe the unique safety and environmental information programming broadcast on The Weather Network and MétéoMédia is essential.³ These communities are listed in Appendix A.
9. When our request for digital basic carriage was denied, Vice-Chair Michel Arpin provided a strong dissent in our favour, and noted that subscribers as well as a major BDU submitted that our services made an exceptional contribution to the *Broadcasting Act*:⁴

"The majority should have acknowledged the impressive support for MétéoMédia and The Weather Network expressed by thousands of subscribers, as well as what Quebecor Media wrote in its intervention, i.e., that MétéoMédia and The Weather Network serve the national public interest "[translation] through their practical content aimed at the health and safety of Canadians" and, accordingly, that they should benefit from mandatory distribution on digital basic."
10. Indeed, Quebecor, after reviewing all the applications, noted that our application for digital basic carriage met every criteria set out by the Commission for mandatory

¹ All Channel Alert and ACA are trademarks of Pelmorex Media Inc.

² Broadcasting Public Notice CRTC 2005-38 issued on 22 April 2005 called for applications for an All Channel Alerting system; Broadcasting Notice of Public Hearing CRTC 2006-3, which was issued to review these applications, was held on May 1, 2006: "The 2006 ACA Proceeding".

³ Broadcasting Public Notice CRTC 2006-23, which was issued on February 28, 2006 (The digital migration strategy), called for applications for mandatory digital basic under Broadcasting Act section 9(1)(h); these were reviewed at PN 2007-20 commencing February 28, 2007: the "Digital Basic Proceeding".

⁴ Broadcasting Decision CRTC 2007-246.

digital basic carriage. In Quebecor's view, Pelmorex was the only applicant in this proceeding that actually met the "test" outlined in PN 2006-23.

11. This new application marries these two concepts of continued digital basic carriage and emergency alerting with a proposal that enables a voluntary public alerting service at no increase in our subscriber fee on basic. As such, Pelmorex's contribution to furthering a number of key policy objectives set out in section 3(1) of the *Broadcasting Act* is even stronger and our ability to satisfy the criteria outlined in PN 2006-23 for mandatory carriage on digital basic is undeniable.

The Criteria

12. The criteria for digital basic carriage are set out as follows in PN 2006-23:
 - *the applicant must provide evidence demonstrating the exceptional importance of its service to the achievement of the objectives of the Act;*
 - *the applicant must demonstrate that having digital basic status will enable its service to contribute in meaningful ways to fulfilling the policy objectives of the Act:*
 - *in particular, the applicant must demonstrate that the programming of its service makes a significant contribution to Canadian expression and reflects Canadian attitudes, opinions, ideas, values and artistic creativity;*
 - *the applicant must also demonstrate how the programming of its service contributes to the overall objectives for the basic service, as summarized above, and how it specifically contributes to one or more objectives of the Act, such as: Canadian identity and cultural sovereignty; ethno-cultural diversity, including the special place of Aboriginal peoples in Canadian society; service to and the reflection and portrayal of persons with disabilities; or linguistic duality (in the case of French-language services, this objective could be achieved, for example, through commitments to produce programming both inside and outside of Quebec);*
 - *the applicant must demonstrate that its business plan and implementation of its specific commitments are dependent on receipt of broad national distribution on the digital basic service; and*
 - *the applicant must demonstrate that the wholesale rate it is proposing would not make its service unaffordable to consumers (in the case of French-language services, this could be achieved, for example, through a lower wholesale rate outside of Quebec).*
13. Pelmorex will demonstrate in the following pages how the nature of our programming undertaking and the vital health and safety programming that is broadcast by our two specialty services satisfy each of these criteria for digital basic carriage.

2.0 The exceptional importance of The Weather Network and MétéoMédia to the objectives of the Broadcasting Act

14. The Weather Network and MétéoMédia currently provide Canadians with unique and exceptional information services that safeguard their personal health and safety. Environment Canada alerts, provincial government warnings, and local road and environmental safety information are aspects of our specialty services that no other broadcaster provides to the vast majority of Canadian communities. This critical health and safety information is not readily available through other media in the same ongoing and systematic manner that The Weather Network and MétéoMédia provide to Canadians in every region of the country.
15. The unique aspects of our services were recognized by Vice-Chair Arpin, who dissented in Decision 2007-246, on the following basis⁵:

In my opinion, the majority members did not take sufficient account of the fact that MétéoMédia and The Weather Network are unique services providing Canadians with top-notch information affecting their safety and their health (e.g. depending on the season: road conditions and construction, UVA and UVB indices, air and water quality, etc.). ... The majority expressed the view that various sources of existing programming, as well as the Internet and telecommunications services, provide weather information. They forgot to take into account that these sources do not offer this information in an ongoing, systematic fashion. They also failed to take into account the fact that MétéoMédia and The Weather Network broadcast all weather alerts issued by Environment Canada...

16. With this application, we are augmenting the unique and exceptional contributions made by The Weather Network and MétéoMédia with a commitment to expand the role that we currently play in the Canadian broadcasting system to include acting as a national public alerting aggregator and backbone network distributor of emergency messages to all broadcasting undertakings and any other third parties with an interest in disseminating alert messages free of charge to the public. This will enable a voluntary broadcasting emergency alerting system, as described in PN 2007-20, to be implemented.
17. Thus through both our ongoing provision of emergency alerts, provincial warnings and weather, environmental and road safety information, as well as becoming the aggregator and backbone network distributor for a national alerting system, The Weather Network and MétéoMédia will make an even more exceptional contribution to furthering the policy objectives of the *Broadcasting Act*. Pelmorex's commitment to fulfilling these roles is dependent upon the issuance of a distribution order pursuant to section 9(1)(h) of the *Broadcasting Act* that would ensure widespread digital basic carriage of our two specialty services. For these reasons,

⁵ Decision 2007-246, *New digital specialty described video programming undertaking; Licence amendments; Issuance of various mandatory distribution orders*, July 24, 2007

Pelmorex requests a mandatory distribution order requiring each Direct-to-Home (DTH) satellite distribution undertaking and Class 1 terrestrial distribution undertaking to distribute The Weather Network as part of the digital basic service, if the BDU is operating in an Anglophone market, and MétéoMédia as part of the basic service, if the BDU is operating in a Francophone market.

18. As we will demonstrate, the weather, environmental and safety information programming we provide on our services on a day-to-day basis and our proposed expanded public alerting role go beyond other broadcasting services to meet the objectives of the *Broadcasting Act* in the following ways:
- Safeguarding the lives and property of Canadians with safety and environmental information;
 - Enriching and strengthening communities with timely local alerts;
 - Giving businesses, especially agriculture, transportation and tourism, the tools they need to contribute more effectively to the national economy;
 - Providing a picture of Canada to Canadians through 100% Canadian content that is also visibly Canadian;
 - Reinforcing Canada's linguistic duality by offering English and French-language local information programming to every community in Canada;
 - Drawing its information programming from local, regional, national and international sources;
 - Reflecting the multicultural and multiracial nature of Canada on-air and through internal policies and practices that have made Pelmorex a recognized role model for the broadcasting industry;
 - Reflecting the special place of Aboriginals in Canadian society;
 - Offering affordable rates, including the provision of both English and French services at a single price in every community across Canada;
 - Offering educational programming;
 - Ensuring our programming is accessible for disabled persons; and
 - Ensuring that our specialty services are at the forefront of the scientific and technological changes taking place in the broadcasting system, with Pelmorex's acknowledged technological leadership.

2.1 Serving to safeguard, enrich and strengthen the cultural, political, social and economic fabric of Canada [section 3(1)(d)(i)]

A new public alerting aggregation and network distribution role

19. In PN 2007-20, the Commission stated “that the broadcasting system, as one of the most powerful delivery platforms, has a vital role to play in the provision of emergency alerts to the Canadian public”. In this public notice, the Commission set out its approach to emergency alerting, and removes the regulatory barriers to the establishment of alert services, providing the opportunity for all parties involved in the development of alert services to work cooperatively, and providing voluntary rather than mandatory carriage of such services by broadcasting distribution undertakings so that they can adopt an alert system that best suits their networks.
20. With the approval of this application, Pelmorex proposes to expand its current role as the only distributor of public alerts to all regions of Canada by acting as a national public alerting aggregator and network distributor according to CANALERT⁶ standards and protocols, and to provide the backbone of a voluntary alerting system. By taking on this enhanced role, Pelmorex would remove the critical practical barrier to a national alerting system as envisioned by the Commission and championed by emergency alerting authorities across Canada.
21. To date no government funding has been announced to support the aggregation and network distribution functions and no other party has stepped forward to play this role at their own cost. Emergency management providers who issue alerts require the single common point of interconnection provided by the aggregator to reach all last-mile distributors effectively in times of crisis. Without this backbone in place, BDUs, including Rogers Cable and ExpressVu, who have declared themselves willing to distribute alerts, have no mechanism to receive authenticated official alerts for the communities they serve across Canada.
22. The Commission stated that it would review progress in the voluntary delivery of an alerting system in early 2009. However, progress is impossible until the prerequisite message aggregator and national distribution network are in place.
23. Pelmorex is prepared to expand the current public alerting mandate that has been granted to our specialty services and undertake to act as a “national public alerting aggregator and backbone network distributor” to all broadcasting distribution undertakings, and any other third parties such as radio and television stations, wire line or wireless distributors who pass the information on to the public. As such, we would fulfill all functions and requirements outlined by Industry Canada for the aggregator function, as shown in Table 1.

⁶ In Broadcasting Decision CRTC 2007-74, The CRTC describes CANALERT as follows: “It is a partnership involving federal departments, provincial, territorial and municipal governments, and the broadcasting and telecommunications industries, and is responsible for the creation of standards and protocols for emergency alert messages.”

Table 1: Key aspects of public alerting aggregation functions and requirements

<p>Technology</p> <ul style="list-style-type: none"> ▪ Collect and authenticate Canadian Common Alerting Protocol (CCAP) compliant messages from issuers ▪ Connect with and transport CCAP messages from issuers to broadcasters and BDUs (i.e. transport) ▪ Host and maintain a national list for authorized users, event codes, geocodes and other databases ▪ Security measures ▪ System logging and reporting, and ▪ CCAP compliant front-end application for issuers
<p>24/7 Operations</p> <ul style="list-style-type: none"> ▪ Technical support for message issuers, broadcasters and BDUs ▪ System monitoring, tests, and coordination with issuers, broadcasters and BDUs (e.g. system failure or unavailability, scheduled upgrades, tests and maintenance) ▪ System log (e.g. activations, tests, and maintenance)
<p>Sustainability and Survivability</p> <ul style="list-style-type: none"> ▪ Backup for system and linkage to message issuers ▪ Ability to deal with technology change, ▪ Location, building and system security, ▪ Expertise and staff competence, ▪ Sustained long-term financial support.
<p>Contribution to User Training</p> <ul style="list-style-type: none"> ▪ Share lessons learned and best practices in forums, workshop and training materials.
<p>Risk Factors and Analysis</p> <ul style="list-style-type: none"> ▪ Elements contributing to failure of aggregation functions ▪ Degree of these risks ▪ Proactive measure to prevent these risks ▪ Worst case scenario analysis

Source: Industry Canada

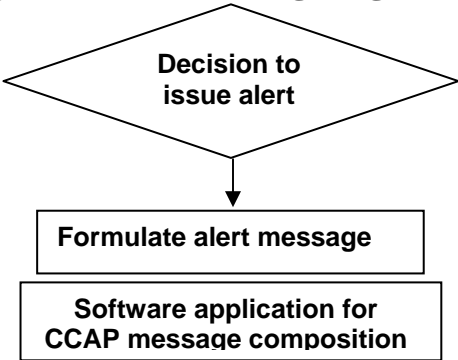
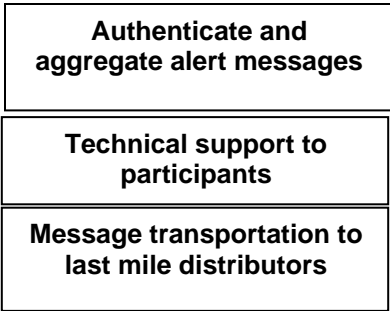
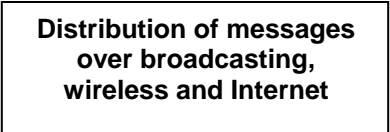
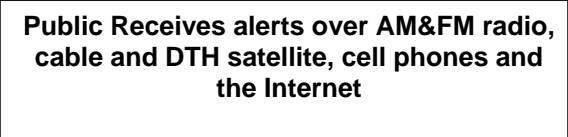
24. Our ability to create and operate the infrastructure to perform as an aggregator and national backbone distributor of emergency public alerts is dependent on the financial stability associated with continued carriage on basic in the digital universe. The investment in 24/7 operations, technical expertise and the fact that others will depend on us requires a sustainable environment of known costs and income.
25. Pelmorex has twice applied to the Commission to provide a national emergency alerting system.⁷ These proposals were for end-to-end services, mandatory for all large BDUs, required equipment to be supplied by Pelmorex, and necessitated an increase in our basic subscriber fee. Although denied, they amply demonstrated Pelmorex's expert qualifications and highlight the need for an emergency alert system that would be comparable to the EAS system that been in place in the United States for more than four decades.
26. The Commission recognized Pelmorex's expertise in PN 2007-20 when it stated,
- Pelmorex possesses substantial expertise in the area of weather-related emergency alerts. It has provided valuable emergency alerts to Canadians relating to weather disturbances since its inception. The Commission further notes that Pelmorex has forged strong working relationships with the aforementioned provinces and emergency planning officials respecting the provision of emergency alerts.*
27. The Commission subsequently amended The Weather Network and MétéoMédia's broadcasting licence in Broadcasting Decision CRTC 2007-72, *Pelmorex Emergency Alerting Service* ("Decision 2007-72") to reflect our role in providing public alerts and warnings, such that operating as an aggregator and national distributor of emergency alerts to other broadcasting undertakings is entirely consistent with our broadcasting licence terms. We are the only such broadcasting undertaking to be so qualified.
28. In this new proposal we would operate an expanded 24/7 operations centre to collect and authenticate alerts from emergency authorities across Canada and to distribute those alerts, through a national network of satellite and Internet feeds, to Canadians. These alert messages would be accessible to every BDU, television and radio undertaking. The system would allow non-proprietary access, using CANALERT approved Canadian Common Alerting Protocol ("CCAP") message format. BDUs and other broadcasting undertakings would then be free to voluntarily decode local alerts and retransmit them on their systems to the public. No increase in our basic subscription fee is requested, as BDUs would be responsible for their own decoding software and obtaining the equipment appropriate for their particular systems.
29. Our open technology design ensures that Pelmorex would not be required to interconnect proprietary equipment with the plant of any BDU. This feature, the

⁷ As part of the 2006 ACA proceeding and in 2001.

voluntary nature of the service, and its provision at no increase in subscriber fee fully respond to the three key objections BDUs raised with Pelmorex's earlier emergency alerting proposals.

30. Table 2 which follows explains the component elements of a national public alerting system as envisioned by Industry Canada, and the responsible parties for each component under our proposal.

Table 2: National Public Alerting System – Diagram of component elements

Function	Responsible parties
<p>Stage 1: Front end Message originator</p>  <pre> graph TD A{Decision to issue alert} --> B[Formulate alert message] B --> C[Software application for CCAP message composition] </pre>	<p>Message originators will include only authorized emergency bodies as agreed to under the Governance structure. These could be:</p> <ul style="list-style-type: none"> ▪ Federal government departments ▪ Provincial government agencies ▪ Municipal and local governments
<p>Stage 2: Message Aggregation and Transportation</p>  <pre> graph TD A[Authenticate and aggregate alert messages] --> B[Technical support to participants] B --> C[Message transportation to last mile distributors] </pre>	<p>Pelmorex would perform these functions on a 24/7 basis. See Appendix B & C for complete details and examples.</p>
<p>Stage 3: Last Mile Distribution</p>  <pre> graph TD A[Distribution of messages over broadcasting, wireless and Internet] </pre>	<p>BDUs, television, radio and telco service providers</p>
<p>Stage 4: Message Delivery</p>  <pre> graph TD A[Public Receives alerts over AM&FM radio, cable and DTH satellite, cell phones and the Internet] </pre>	<p>Reception by the public on AM&FM radio, cable and DTH satellite services, cell phones and the Internet</p>

Source: Industry Canada, with Pelmorex explanatory comments

31. Pelmorex would fully perform each function that Industry Canada has identified for the role of “Message Aggregation and Transportation” to last mile providers, as follows:
- Collect and authenticate CCAP messages from issuers.
 - Transport CCAP messages from issuers to last-mile distribution, e.g. Broadcasters, BDUs and other message disseminators.
 - Host and maintain a national list for authorized issuers, event codes, geo codes and other databases.
 - Ensure the security of the connections, applications, databases and other hard- and software for Stage 2.
 - Log and report system activities including records of activations, testing, upgrades and maintenance.
 - Assist installation and operation of hard and software at access points.
 - 24/7 Operation: provide technical support for message issuers and last-mile distributors.
 - System monitoring, tests, and coordination with issuers, broadcasters and BDUs (e.g. system failure or unavailability, scheduled upgrades, tests and maintenance).

Governance

32. A strong, open and participative governance system is required to ensure the emergency alerting aggregation and transportation meets the requirements of both authorized emergency alert providers, and the last mile providers. Pelmorex believes that working cooperatively with all key stakeholders is essential to the successful implementation and operations of emergency public alerting. We have distributed Environment Canada warnings for 20 years with both Commission oversight and ongoing input and feedback from Environment Canada. We have also, more recently, been distributing provincial warnings with the assistance of the appropriate provincial bodies. We propose to build on this experience with a more formal governance approach given the multiplicity of stakeholders in a national broadcast alerting system.
33. Our involvement with CANALERT initiative has included participation in the creation of standards and protocols for emergency alert messages. We will continue to work with CANALERT stakeholders, with Public Safety and Emergency Preparedness Canada, and also with the Canadian Association of Broadcasters internal task group, which is dedicated to ensuring that radio and television stations that wish to voluntarily carry emergency alerts are fully able to do so.

34. While Pelmorex will continue to be subject to the jurisdiction of the Commission under the *Broadcasting Act* for the broadcast of alerts to the public as part of our existing broadcasting undertaking, our governance proposal ensures that there will also be input and supervision by emergency authorities in tandem with this Commission oversight. Our governance structure also incorporates Industry Canada’s determination of the roles and responsibilities of various stakeholders, and respects the needs expressed by BDUs and broadcasters during the 2006 public alerting proceeding.
35. Pelmorex proposes a Governance Board comprised of representatives from five federal ministries or agencies [e.g. PSEPC, IC, EC, Health, CRTC] and five provincial/territorial representatives [e.g. one from each region] as well as a representative of the Canadian Association of Broadcasters, the CCSA, and a representative from each of the DTH and large cable undertakings or such other representation as the CRTC may direct. The Board’s proposed role is summarized in Table 3, with greater detail provided in Appendix B.

Table 3: Proposed Role of the Governance Board

Give <i>direction</i> on matters related to	Give <i>advice</i> on matters related to
<ul style="list-style-type: none"> • Implementation on CCAP updates. • Alert Message file attachments to be supported • Definition of approved users • Reporting requirements • Jurisdictional disputes 	<ul style="list-style-type: none"> • Standard Contractual terms with Users [Access agreement] • System and access security • Redundancy and back-up

36. From time to time, consultations will take place with a broader group of “key stakeholders” which will include government users at all levels as well as individual broadcasting undertakings and undertakings that fall under the jurisdiction of the *Telecommunications Act*.
37. To augment this information about our role as national public alerting aggregator and backbone network distributor, we offer the following appendices:

Appendix B: **Pelmorex Public Alerting Aggregation & National Transport Model**
 This document sets out our proposed roles and responsibilities, as well as governance model.

Appendix C: **Processing an Alert Message through Pelmorex’s Public Alerting Aggregation & Transport System**
 This document provides a detailed description of each public alerting stage.

Our existing unique and exceptional safety information

38. The safety information and the alerts that are provided today by The Weather Network and MétéoMédia are exceptional and not duplicated by other players within the broadcasting system or by other media. By providing Environment Canada alerts, provincial warnings, and weather, road and environmental safety information, The Weather Network and MétéoMédia make an exceptional contribution to the objectives of the *Broadcasting Act*.
39. This is entirely consistent with our broadcasting mandate. The Commission first recognized the unique nature of The Weather Network and MétéoMédia 20 years ago in Decision CRTC 87-899, which stated:

Perhaps more significantly, it allows the delivery of local weather information to a particular local head-end from one national network, as well as the immediate transmission of Environment Canada's weather warning and advisories to specific areas.

The Commission considers that this network will perform a valuable public service in terms of improving public safety through the provision of up-to-the-minute-essential weather information from local, regional and national perspective, at any time of the day or night, while adding to the diversity of programming available on the Canadian Broadcasting system.

Environment Canada alerts

40. Pelmorex has a close partnership with Environment Canada and uses localization technology to send weather alerts to affected communities, warning them of severe weather, including tornadoes, ice storms, and hail storms. This warning system can make a life or death difference to Canadians and Environment Canada has put on the record that other broadcasters do not reliably provide it, as this quote from its strong intervention during the 2006 proceeding shows:

*Most broadcasters are national in scope and do not allow for tailored local content. A large number of them also rely on automated programming at least for part of the week or night. This does not allow for the broadcast of a weather warning when and where it counts. While these systems have been developed to overcome these issues, today there is no comprehensive system operating in Canada. Until a comprehensive alerting system is in place, Pelmorex is the only one that enables MSC to provide weather warnings to every cable TV equipped household in Canada, and as such should remain, in our opinion, a mandatory basic cable service. **David R. Grimes, ADM, Environment Canada***

41. We have been airing Environment Canada warnings reliability and consistently for 20 years, and we remain the only national broadcaster with the technology and capacity to localize these warnings.

Provincial all hazard emergency warnings

42. The Weather Network and MétéoMédia started working with provincial governments in 2005 to offer a range of emergency warnings to local communities that go well beyond weather alerts.
43. In New Brunswick, Quebec and Ontario, where this program is being piloted, Pelmorex uses its localization technology to send warning messages on The Weather Network and MétéoMédia channels in affected communities, warning them of such emergencies as forest fires and floods. It can target viewers in a single community, several adjacent ones, or across the whole province. Citizens could potentially be alerted by provincial authorities to tainted water, evacuation notices and even terrorist threats. In all cases, warnings can be sent in English to The Weather Network and in French to MétéoMédia.
44. This unique service is dependable and automated, operating 24-hours a day, seven days a week. Government authorities consider it an essential service:

Pelmorex also broadcasts a variety of other health and safety information, and recently, has begun broadcasting urgent alerts from designated provincial officials. Government officials depend on The Weather Network and MétéoMédia to keep them informed about developing situations and to assist them in getting urgent messages out to the public in English and French. In that regard, we view these channels as an essential service. Ernest MacGillivray, Chief, New Brunswick Emergency Measures Organization.

Local and regional weather information

45. Pelmorex excels in meeting local and regional weather needs with updated information every 10 minutes. For many Canadian communities, The Weather Network and MétéoMédia are the only broadcast source of up-to-date local or regional weather and road information as shown in Table 4. For example, only 11 communities in the vast geography included in Newfoundland and Labrador are served by local radio and two by local television; whereas 117 communities can receive local and regional weather updates, alerts and safety information by tuning to The Weather Network and/or MétéoMédia on local cable. Even in communities served by local broadcasters, our services may be the only source of local, up-to-date weather information and alerts on weekends and evenings when many broadcasters rely on automation.

Table 4: Comparison of communities with local broadcasters vs. communities where local weather updates are offered by BDUs with either The Weather Network or MétéoMédia on basic				
Province	# of BDUs (except DTH) affiliated to TWN and/or MM	Communities with Local Radio Stations	Communities with a Local Television Station	Communities where TWN and MM provide the only local forecast
NL	117	11	2	112
PEI	17	2	1	15
NS	62	18	3	44
NB	71	17	4	54
QC	290	70	12	220
ON	316	89	18	227
MB	97	15	2	82
SK	210	19	4	191
AB	148	36	6	112
BC	122	51	8	71
YT	1	2		
NWR	3	2	1	1
NU	0	2		
Totals	1,454	334	61	1129

Source for radio and television: *Broadcast Dialogue's Broadcast Directory*. Source for BDUs: *MediaStats*. Note: communities where both The Weather Network and MétéoMédia are provided have been counted only once.

46. The key to The Weather Network and MétéoMédia's ability to serve small communities with affordable, detailed and constantly updated local weather and safety information – when no other broadcaster is able to do so – comes from operating a national service that has broad basic service distribution.
47. No other local radio or television broadcaster, specialty service or pay television service operating in Canada has the ability, technology and infrastructure to provide continuously updated local weather, environmental and road safety information that is as detailed, as frequent or as accurate as that provided on The Weather Network and MétéoMédia, 24 hours a day, 7 days a week. While some broadcasters provide enhanced weather forecasts for major markets like Toronto, Montreal and Vancouver, The Weather Network and MétéoMédia outperform all of these service providers and other weather forecasters in terms of quality and frequency. We also provide the same level of forecasting detail, accuracy and frequency to Canadians in communities of all sizes from coast to coast to coast. The value of our services was acknowledged by thousands of viewers from hundred of communities who wrote to the Commission in support of our original digital cable application. Their views were echoed by Canada's emergency authorities.

Each and every citizen of Ontario should have equal opportunity to information that impacts his or her health and safety without a price tag. We, at EMO and the Ministry of Community Safety and Correctional Services fully support the carriage

of The Weather Network and MétéoMédia as part of the basic service of cable and satellite. Eliminating this from basic service would be a great disservice to the community... Dan Hefkey, Chief, Emergency Management Ontario

PEP/EMBC believe that the Weather Network and MétéoMédia are key partners in public safety through the dissemination of warnings. To our knowledge, they are the only broadcasters to reliably broadcast weather warnings to the geographically appropriate audience. Of particular importance to British Columbia, in addition to broadcasting weather-related warnings, the Weather Network and MétéoMédia have also agreed to broadcast tsunami warnings to coastal residents.

Cam Filmer, Executive Director, Emergency Management BC

Road safety information

48. During a Canadian winter, road safety information is a pressing concern for Canadians. The Weather Network and MétéoMédia play a unique role in aggregating and delivering this information. No other broadcaster provides the detailed, local and up-to-date roadmaps that guide citizens in their transportation routes and helps them make life and death decisions about travel plans.
49. Pelmorex aggregates information on local highway conditions from provincial Ministries of Transport, who collect data through a network of information gatherers consisting of provincial police, emergency personnel, and salting and sanding truck operators. Information from various sources is combined to provide reliable and up-to-date local road safety reports twice an hour. The Weather Network and MétéoMédia continuously update and broadcast 185 regional roadmaps based on reports about 3,053 road segments, to show safety conditions on traffic routes all across Canada.
50. The detailed road information is targeted to Canadians on a local level, whether Prince George, B.C., Sept Isles, Quebec, or Stephenville, Newfoundland, assuring that travelers know which local highways are hazardous. For the vast majority of Canadian communities, The Weather Network and MétéoMédia are the only broadcast source of local road information. Even in major centers, local broadcasters are unable to match The Weather Network and MétéoMédia for frequency, timeliness and accuracy.

Environmental health information

51. Pelmorex is a Canadian pioneer in the provision of environmental information. As the frequency of environmental diseases has escalated, we have responded to increasing public concern about skin cancer, asthma, and airborne allergens and pollutants.
52. The Weather Network and MétéoMédia created the first national UV monitoring network in Canada in 1993, forecasting the local UV index for each hour of the day, factoring cloud cover in with seasonal and hourly proximity to the sun. We broadcast this local information six times an hour. We also broadcast air quality

data reports from a network of 157 collection sites across Canada. Our local pollen count and air quality indices have become essential to many families of allergy and asthma sufferers in planning daily activities. Health agencies counsel the use of these reports. The Quebec Ministry of Health website, for example, directs visitors to MétéoMédia for local pollen counts.

Up-to-the-minute emergency information is not accessible via other media for many Canadians

53. When applications were considered during the Digital Basic Proceeding earlier this year⁸ many Canadians wrote to the Commission to say that The Weather Network and MétéoMédia were the only broadcast sources of essential local safety information, such as emergency alerts, road safety information and environmental and air quality reports, that were available in their communities. As quoted earlier in paragraphs 40 and 47, emergency authorities also held this view in interventions that were filed with the Commission. Needless to say, daily and weekly newspapers cannot provide timely alerts. Intervenors also stated they could not reliably access emergency alerts on the Internet.
54. While we provide emergency alerts on www.theweathernetwork.com and www.meteomedia.com, we know that a significant number of Canadians do not have reliable Internet access. In particular, we heard from low-income Canadians, seniors and disabled people who could not afford computers and Internet services, or could not navigate the Internet. During the intervention period for our application for basic carriage in Spring 2007, hundreds called our offices in Montreal or Oakville – sometimes dozens a day – to say they did not have the computer equipment or proficiency to write an intervention but they relied on our services on basic.
55. Rural Canadians who are dependent on dial-up services also intervened, to say they felt they could not take the time to access Internet information as an emergency loomed. In any case, they said they were more likely to monitor their television than a website, and would want to leave telephone lines available during an impending emergency.

*The Weather Network is the only way I can get timely warnings and information about approaching storms when I am at my farm in summer. There is no Environment Canada radio broadcasting that I can pick up. Local radio and TV stations do not broadcast weather alerts on weekends. They only have prerecorded material. Internet is spotty in our area and so is cellular telephone but I can always get the Weather Network on TV. The Weather Network has quite literally saved my life because just last summer they warned me about a very severe storm just near my place in Alonsa, Manitoba ... **Natalie, Alonsa, MB***

⁸ NPH CRTC 2007-1

My mother, who is on a fixed income, does not have digital cable nor does she have access to a computer. Her hearing is extremely poor and therefore radio is not an option for her to get weather forecasts...I am comforted by the fact that they are aware of pending storms, frigid temperatures, etc. via the weather channel, particularly when I am on the road and unable to look out for them.

Linda, New Maryland, NB

56. The Commission's data that was issued in July 2007 showed that 3.7 million Canadian homes are without Internet access subscriptions, or about 30% of all Canadian homes. A further 1.2 million homes rely on dial-up Internet access only.⁹ In contrast, fully 10.5 million or 81% of Canadian homes have basic cable or satellite service subscriptions. Pelmorex submits that while the Internet may supplement the distribution of broadcast alerts, it must not be counted on a reliable source for millions on Canadians.
57. Thus The Weather Network and MétéoMédia make an exceptional contribution to fostering the growth of Canada's cultural, economic and political aims through the provision of unique safety information.

2.2 Encourages the development of Canadian expression [section 3(1)(d)(ii)]

58. The Weather Network and MétéoMédia are rare and exceptional broadcasting services, providing 100% Canadian content, which few other commercial services attain. We project our expenditures on Canadian programming will reach 41% of revenues in 2010.
59. Our programming is identifiably and distinctly Canadian at all times. Through our hourly national newscasts, we provide information and analysis concerning the weather in Canada and other countries from a Canadian point of view. Our award-winning series on climate change addressed global warming from a Canadian perspective, with an English-language and French-language crew sent to report first-hand on the impact of global climate change from the Canadian Arctic.
60. We are a news service that broadcasts primarily live programming and that presents a tremendous amount of original material every day. The small portion of our programming that is pre-recorded and repeated consists of our educational, award-winning vignettes. This programming on both channels includes hundreds of seasonal mini-features on popular weather, environmental and safety topics.

⁹ CRTC Telecommunications Monitoring Report, July 2006.

2.3 Serves the needs and interests, and reflects the circumstances and aspirations, of Canadian men, women and children, including equal rights, the linguistic duality and multicultural and multiracial nature of Canadian society and the special place of Aboriginal peoples within that society [section 3(1)(d)(iii)]

Reflects and contributes to Canadian's linguistic duality;

61. The Weather Network and MétéoMédia are unique as a bilingual programming undertaking. Pelmorex's provision of MétéoMédia free to BDUs operating outside the province of Quebec when both MétéoMédia and The Weather Network are carried on basic solidly supports the principle embraced by the Commission in Public Notice CRTC 2001-25: that increased access to existing French-language services throughout Canada will contribute to the promotion of linguistic duality and cultural diversity¹⁰. In addition to being a source of national information about Canada in the French language, MétéoMédia reflects the needs of individual Francophones and Francophone communities in Quebec and outside the province with its local weather information. With guaranteed carriage under section 9(1)(h) of the *Broadcasting Act*, this practice will be able to continue.

Reflects the multicultural and multiracial nature of Canadian society;

62. Pelmorex has consistently been recognized as a leader in employment equity and diversity, acting as a role model and activist within the broadcasting industry and among Canadian employers in general. CRTC Commissioner Andrew Cardozo complimented Pelmorex at our most recent licence renewal hearing for the substantial diversity that exists among our on-air weather presenters:

*"I have certainly observed it over the last few years, that your on-air personnel does reflect quite a diversity, the presence of several skilled anchorpersons who are visible minorities, and I just want to compliment you for that, and also ask if you have got any advice to broadcasters as to how you do it? I mean, why have some been so reluctant to reflect diversity, while you seem to do it quite naturally, I think"*¹¹.

63. In 2003, the company was named one of Canada's top employers by Maclean's magazine, and received the Vision Award that year for Excellence in Employment Equity from Labour Canada, now called Human Resources and Social Development Canada (HRSDC).
64. In the 2005 HRSDC Employment Equity Annual Report, Pelmorex was featured as 'An Employment Equity Success Story' and profiled in a chapter '...as an employer who has demonstrated an exemplary commitment to the principles and goals of

¹⁰ Pelmorex also allows The Weather Network to be carried free by BDUs in Quebec when both MétéoMédia and The Weather Network are carried on basic, thus giving equal access to its programming to the English linguistic minority in Québec.

¹¹ June 20, 2001, CRTC Public Hearing, Gatineau, Quebec.

employment equity.’ Also in 2005, The Conference Board of Canada released its Employer’s Guide ‘Maximizing the Talents of Visible Minorities’ with Pelmorex as a case study.

65. Our approach to employment diversity results in award-winning diversity on-air. In 2007, The Weather Network was awarded The Adrienne Clarkson Diversity Award, one of the most prestigious awards in radio and television journalism. It is given to the story, feature or series that best exemplifies or explores an issue of diversity in a news program. Our winning entry, against CBC's The National and CTV National News, was a 2006 Black History news series from our Maritime Bureau on how weather affected Black Loyalists and their historic burial site in Nova Scotia. Adrienne Clarkson presented the award at the Radio Television News Directors’ Association conference in June 2007.

Reflects and contributes to Canada’s diversity, including the special place of Aboriginal people in Canadian society;

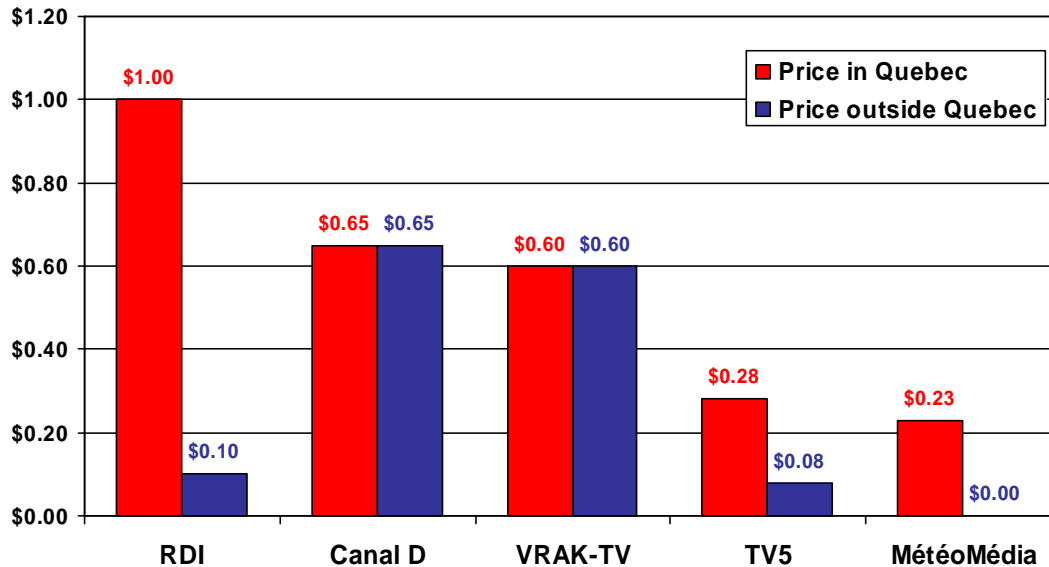
66. The Weather Network and MétéoMédia have played a substantial role in aiding Aboriginal reflection through the hiring of Aboriginal on-air personalities and other staff, as well as through a longstanding relationship with APTN, the Aboriginal People’s Television Network. In its annual diversity evaluation by HRSDC, Pelmorex has consistently earned an A rating regarding Aboriginal peoples. The rating of ‘A’ indicates superior performance in all six indicators (representation, clustering, salary gaps, hiring, promotions, and terminations).
67. Aboriginal communities with satellite or cable TV also benefit from The Weather Network and MétéoMédia’s local information on weather and road conditions. Cable operators such as Moose Factory Cable Inc. and Mocrebec Development Corp which serve the Moose Cree First Nation on James Bay in Northern Ontario, Télécable Petsiamit in the Malbaie area of Québec and the Puvirnituk Coop serving an Inuit community of less than 1,200 in Nunavik, are among the BDUs providing The Weather Network and MétéoMédia’s local weather forecasts to Canada’s Aboriginal people in remote communities.

2.4 *Is varied and comprehensive, providing a balance of information, enlightenment and entertainment [section 3(1)(i)(i)] and distributors should provide efficient delivery of programming at affordable rates, using the most effective technologies available at an affordable cost [section 3(1)(t)(ii)]*

68. The Weather Network and MétéoMédia are offered across Canada at a single subscriber fee. Canadians in underserved communities with no local broadcasters are able to receive the same quality of detailed local weather, environmental and road safety information from The Weather Network and MétéoMédia, at the same price, as subscribers in larger centers.

69. Given the widespread distribution of The Weather Network and MétéoMédia on basic throughout Canada, Pelmorex is able to offer MétéoMédia at a rate that is considerably lower than many other Canadian French-language services in Quebec.
70. The pricing structure of The Weather Network and MétéoMédia is particularly beneficial for Canada’s linguistic minorities, as shown in Figure 1. For Francophones outside the province of Quebec, MétéoMédia is available on basic at no additional charge to the BDU where The Weather Network is distributed as part of the basic service, despite the fact that additional equipment may be required for the second service at a cost to Pelmorex of several thousand dollars per cable head end. Ottawa and Moncton are among the cable markets that have availed themselves of this offer. The same policy applies to English-language service within Quebec – both English and French-language weather services are offered for the price of one where both are carried on basic, or \$0.23 per month. As BDUs move to all digital distribution and bandwidth constraints diminish, Pelmorex expects many more markets will take advantage of this bilingual offer.

Figure 1:
Fees for French language specialty television services
when delivered on basic television service



Source: CRTC

2.5 Drawn from local, regional, national and international sources [section 3(1)(i)(ii)] and takes into account regional needs and concerns [section 5(2)(b)]

71. The Weather Network and MétéoMédia are leaders in local programming, and the only broadcaster that provides detailed, up-to-date local information programming to hundreds of communities across Canada numerous times an hour. In addition to meteorological data, The Weather Network and MétéoMédia draw their news footage from four regional bureaux across the country, in Vancouver, Toronto, Montreal and Moncton. Our bureau reporters cover their respective regions extensively, giving viewers a picture of the various climates in Canada as well as facts on weather events and news, agriculture, lifestyles, and the environment in every part of the country. Pelmorex also regularly uses freelance reporters and stringers across the country who are deployed to capture news on major weather events.

2.6 Includes educational and community programs [section 3(1)(i)(iii)]

72. There is a strong educational component to Pelmorex's approach to weather information. Vignettes and program features regularly educate Canadians about Canadian geography and climate. The governing programming philosophy at Pelmorex is "weather explanation and education" and thus all forecasts are geared to help viewers better understand their climate, how weather systems develop, and how it affects lives. We believe this is the reason that Canadians picked The Weather Network for the fifth year in a row as having the best forecast on television by a margin of more than seven to one over the next competitor in the 2006 TV Quality survey conducted by Canadian Media Research Inc.¹²

2.7 Accessibility for disabled persons [section 3(1)(p)]

73. Pelmorex has worked closely with disabled communities to ensure that our services meet their needs. The text and graphic presentation of local forecasts are ideal for deaf and hard-of-hearing viewers. Pelmorex has made significant investments to complement closed captioning of regional forecasts by ensuring their text and graphic presentation are significantly superior to all other TV weather presentations in their ability to tell the weather story to the hearing impaired.
74. To serve Canada's vision impaired, both The Weather Network and MétéoMédia have invested in improving the descriptive narrative abilities of their presenters, as descriptive video is not an option for live programming. Pelmorex works closely with representatives of the Canadian National Institute for the Blind ("CNIB") on

¹² Canadian Media Research Inc., The TV Quality Survey 2006: A Report on Canadians' Attitudes Towards TV, December 2006 (survey of 1,1354 English-speaking Canadians aged 18+)

this initiative, and meets CNIB representatives at least once a year. Feedback is ongoing. We are close to achieving our goal of having the equivalent of 100% descriptive video for our regional reports.

75. In addition, The Weather Network and MétéoMédia provide regional audio reports on the secondary audio programming (SAP) channel of both services and also provide audio reports on Voiceprint to complete the information available to the vision impaired.

2.8 *Readily Adaptable to scientific and technological change [sections 3(1)(d)(iv) and 5(2)(c)] and does not inhibit the development of information technologies and the delivery of resultant services to Canadians [section 5(2)(f)]*

76. Pelmorex is recognized as a technology leader among broadcasters, and with this application we propose to expand the scope of our undertaking to serve as the emergency alerting aggregator and network distributor for the entire broadcasting industry in an open, non-proprietary system. We will facilitate and become the catalyst for the development and use of information technologies in the delivery of emergency alerts to Canadians. Any distributor or broadcaster wishing to re-distribute emergency alerting information to the public will have access to it, including those beyond the broadcasting system such as wireless and telephone system operators.
77. In addition to being the first and only national broadcaster to use localization technology to meet the needs of individual communities, Pelmorex has been a leader in Internet and interactive applications – not just among the broadcasting community but among all Canadian businesses. The distribution of local and regional forecasts to individual satellite subscribers on ExpressVu's DTH system is a technology break-through implemented in 2006 by Pelmorex.
78. We are now starting to roll out two-minute local forecasts, updated every four hours, on Video on Demand in Canadian CMAs. We have also designed a branded weather icon for set-top boxes that provides digital cable subscribers with an instant, interactive local weather forecast. These services, provided at no charge to our distributors, reflect our philosophy of continuing to upgrade our services to Canadian subscribers.

3.0 Public support for our services on basic

79. Overwhelming and unprecedented public support for the carriage of The Weather Network and MétéoMédia on basic is already on the public record. More than 15,000 individuals and organizations from almost 1,000 communities across

Canada sent individual letters to support our application for digital basic carriage for The Weather Network and MétéoMédia between January 25th and March 8 of 2007. A further 2,000 names were collected on petitions that developed spontaneously across Canada. Hundreds of other Canadians telephoned our offices. In Montreal, some 400 citizens without access to email or fax or who were unable to send letters because of disabilities used our 1-800 number to put their names on a petition. In Oakville, more than 50 calls were logged every day for several weeks, many from Canadians who lacked the computer skills or English or French-language proficiency to write a letter, but nonetheless were determined to make their voices heard in some way.

80. These Canadians were private citizens from all walks of life, including parents, university professors, students, truck drivers, day care providers, pilots, teachers, sailors, farmers, health care workers, and even a community of Roman Catholic monks. They emphasized in their letters to the Commission that public safety information is a right, not a luxury.
81. Individual supporting interventions in the digital cable proceeding were augmented by the voices of public safety organizations. These included national and provincial safety organizations and government bodies, such as Environment Canada, The Canadian Emergency Preparedness Association, The Canadian Red Cross, Emergency Management Ontario, New Brunswick Emergency Measures Organization, Emergency Management British Columbia, and the Ontario Association of Fire Chiefs. They sent a clear message that public safety information must be available to all citizens.
82. Dozens of local governments also wrote to the Commission in support of our digital basic application. Many Ontario communities sent letters of support and often attached resolutions from council meetings, including the Townships of Aran-Elderslie, Canton Bonfield, Chisholm, Conmee, Gillies, Huron Kinloss, Morley, Ryerson, and Tiny, and the Municipalities of Neebing, Whitchurch-Stouffville, the towns of Gore Bay, Midland, Mississippi Mills, Monsonee North Shore, and Richmond Hill, and the cities of Ajax, Oshawa, North Bay, Stratford, Thorold, and Whitby. These communities, as well as others farther a field including the Cities of Lunenburg, Moncton, Trois Rivières, and Bathurst wrote on behalf of their citizens and their public works departments to underline the importance of The Weather Network and MétéoMédia to public safety.
83. Numerous agricultural organizations testified to the importance of The Weather Network and MétéoMédia's contribution to the Canadian economy: The Dairy Farmers of Canada, The Pork Council, The Agricultural Alliance of New Brunswick, The Ontario Federation of Agriculture, the Keystone Agricultural Producers (Manitoba), the Wild Rose Agricultural Producers (Alberta). Together these organizations represent more than 75,000 family farm businesses whose livelihoods are dramatically enhanced by reliable local weather forecasts – and who have difficulty obtaining this local information from other sources.

84. These 15,000 interventions dramatically confirm an Environics' survey of 1,200 Canadians, which was appended to our original digital basic application in August 2006. Some 90% of Canadian surveyed favoured keeping The Weather Network and MétéoMédia on basic. Most Canadians strongly opposed any change that could be made by the Commission that would allow cable and satellite service providers to remove The Weather Network and MétéoMédia from the basic service.

4.0 Our business case is dependent on digital basic

85. Pelmorex's current service to consumers as well as our proposal to perform the expanded function of public alerting message aggregator and network distributor require the financial certainty and stability of ongoing widespread carriage of The Weather Network and MétéoMédia on basic. In the absence of stable funding, the weather, environmental and road safety information services we provide today to every Canadian community will also be jeopardized. Likewise, the investment in infrastructure and the provision of secure and reliable 24/7 services on an ongoing basis cannot be undertaken in a climate of fiscal uncertainty. The financial model in Appendix D of this application shows how the stability of carriage on digital basic service ensures that investments in public alerting aggregation and network distribution are possible. Conversely, should this application be denied, Pelmorex would be unable to undertake the expanded function of public alerting message aggregation and network distribution, and indeed face significant cutbacks in all areas of the company, including Canadian programming. This is illustrated in the financial models in Appendix E to this application.
86. The consolidation of distribution gives each major BDU overwhelming bargaining power. As one of Canada's few remaining independent, standalone operators, Pelmorex is not in a strong position to negotiate fair and commercially reasonable carriage rates and packaging. The top six BDUs represent more than 88% of our subscriber base – and each is essential to our viability.
87. If The Weather Network and MétéoMédia were no longer guaranteed basic carriage, there would be a significant negative impact on our business:
- Under this scenario, our services might be carried on discretionary tiers in some major markets. If one of our services were moved to a package that has subscriber penetration of 60% or less, a likely outcome, there is no way that a BDU would agree to a wholesale rate that would adequately compensate us for the declining subscriber numbers and vastly reduced advertising revenues resulting from that change.
 - We also know that some BDUs would demand lower affiliation fees for our services to remain on basic in major markets – and we would have little choice but to agree if we wanted to retain our advertising revenue. In essence,

the threat of being removed from basic will be used to extract a lower basic wholesale rate from our specialty services.

88. Our high capital costs mean that with a reduced subscriber base, our two services would only remain viable with significant rate increases and/or substantial cuts in programming and capital spending. Cutting costs is the more likely scenario but our services have far less ability than a typical specialty television service to respond to a reduction in revenues by cost cutting for two reasons:
- First, live, 24-hour weather, safety and environmental information programming services that operate in both of Canada's official languages are labour and capital intensive with a large investment in people and technology. Our investment in capital assets is the largest of any specialty television services, based on a comparison of depreciation over the past five years.
 - Second, because our programming is 100% original and 100% Canadian, programming costs cannot be reduced through the substitution of inexpensive foreign imports.
89. Lower programming quality, such as introducing repeats, reducing expenditures on weather and safety programming, and focussing on large urban markets, are the only ways to reduce programming budgets.
90. A simple illustration, showing the financial impact on our services, smaller BDUs and consumers of even a modest reduction in carriage of The Weather Network, is included in Appendix F. It shows how profitability levels would decline if The Weather Network lost 2.2 million subscribers or 20% of our subscribers through repackaging on tiers. This scenario is not unlikely, as was confirmed at the Canadian Association of Broadcasters annual conference in November 2007. When BDU representatives were asked during a panel discussion, what the basic tier would include and what its price would be with less regulation, Phil Lind, vice-chair of Rogers Communications answered, "We would have less services and the price would be lower."¹³
91. The Weather Network and MétéoMédia today have more than 11 million subscribers. If our subscriber base were reduced by 2.2 million subscribers (about 20%) due to tiering, the corresponding reduction in our revenues derived from advertising and subscription fees would be more than \$10 million a year. The cuts required to maintain profitability would be visible on the screens of Canadians, particularly those in small communities and rural Canada.
92. Even if only one of the top six BDUs – Shaw, Rogers, ExpressVu, Videotron, Star Choice and Cogeco – were to decide to remove The Weather Network or MétéoMédia from the basic service and distribute it as part of a digital package, the impact would be significant. For example, if one of these BDUs were to move The

¹³ As quoted by Kurt Elby on 11/07/2007 in "Regulation, Redefined more like Regulatory Wish Lists", Tech Media Reports, (<http://www.techmediareports.ca/reports>)

Weather Network to a digital package that has a fairly high penetration (at around 50%), our subscriber revenues would still be cut in half on those systems and our advertising revenues would suffer a similar fate, resulting in a loss of millions of dollars a year from a single BDU. This financial impact would be compounded if we were unable to retain our current wholesale rate in the other major systems where our services would remain on basic. This impact will be felt directly by consumers, as we show in Section 5 of this brief.

4.1 Basic distribution has fostered excellence

93. Our history of dual status carriage for The Weather Network and MétéoMédia has been a driver for excellence that has benefited consumers. With a fixed wholesale fee, our services have only been able to grow by enhancing our programming to attract viewers, and hence advertisers. We operate in competitive environment that drives us to invest and improve continually. The details of our programming improvements are fully on the record as a result of the 2007 digital basic proceeding¹⁴. The result has been that our viewership has outpaced the growth in residential BDU subscribers despite the proliferation of viewing choices:

- From 1994 to 2007 total residential subscribers grew by 40.1%;
- During the same period, our total weekly viewers grew by 59.7% while our average weekly minute audiences grew by 157%.

94. Broad distribution is also essential to our viewing success. The nature of weather information means people view for short periods of time and that broad frequent convenient access is equally important.

4.2 Maturity and popularity will NOT ensure that The Weather Network and MétéoMédia can fulfill our mandate without basic carriage

95. Given the limited degree of competition that exists in the broadcasting distribution market and the degree of control that BDUs exercise over access by Canadians to programming services, the popularity of our services will not ensure that they remain on basic in a digital environment. In fact, their popularity is just as likely to be a reason for moving them to a discretionary tier or package to help boost its penetration.

96. Nor will the popularity of our services ensure that most Canadian BDU subscribers would choose to purchase tiers or additional packages to continue to receive The Weather Network or MétéoMédia. Many of the comments the Commission received from subscribers in the 2007 Digital Basic Proceeding demonstrated their

¹⁴ These include increased localization; the introduction of greater environmental data and road safety data; the introduction of provincial emergency alerts; localized forecasts for satellite subscribers, etc.

unwillingness to pay more to get services that they are already receiving as part of their basic service.

97. Significantly, these comments were confirmed in a survey that BDUs – including Rogers, Bell Canada, TELUS, SaskTel, MTS Allstream, and the Canadian Cable Systems Alliance (CCSA) – jointly commissioned for the Television Policy Review proceeding in November 2006.¹⁵ At that time, the BDUs provided survey results revealing that a majority of Canadian TV subscribers (81%) oppose paying increased cable or satellite bills for television signals that are currently available at no extra fee as part of the basic service.

4.3 Investments in programming improvements depend on Digital Basic

98. In addition to the significant investment and ongoing operating costs required to operate as a national public alerting aggregator and backbone network distributor of a voluntary Canadian broadcasting alert system, Pelmorex is committed to implementing the following programming expenditures and improvements. These initiatives will be jeopardized without the financial stability afforded by basic distribution, and each will be re-evaluated.

HDTV

99. The Weather Network and MétéoMédia are on the eve of initiating the substantial costs of converting to HDTV. Unlike any other broadcaster, Pelmorex must develop, design and roll out a localization unit that is compatible with HDTV technology, in addition to investing in HDTV production systems. HDTV conversion will require equipment installation at all 1,200 affiliate headends across Canada to upgrade localization units – a capital cost in excess of \$10,000,000 alone.

More local information

100. Pelmorex plans to embark on the next phase of significantly improving our forecasting through enhanced software and systems for mapping and profiling. We will continue to refine our forecasting to target even smaller geographic areas to better serve small and remote communities. At the same time, more data will be collected from provincial and municipal sources on topics that range from road and school closures due to inclement weather to air and water quality advisories and warnings.

More provincial alerting

101. Pelmorex continues to roll out its program of providing targeted emergency warning by provincial government authorities, based on its pilot projects with the provinces of Quebec, New Brunswick and Ontario.

¹⁵ Broadcasting Notice of Public Hearing CRTC 2006-5.

More regional input into the weather news

102. Pelmorex will improve weather news by expanding our capability to cover extreme weather across Canada. The Weather Network and MétéoMédia are upgrading their ability to tell the weather story through the use of regional “videographers” located strategically across Canada. Initial plans call for staff on board in Calgary/Edmonton, Regina, Winnipeg, Gatineau/Ottawa, Quebec City, St. John’s and the far north. As well as videographers in more locations, The Weather Network and MétéoMédia are in the process of upgrading local information gathering from viewers through web-based mechanisms to collect and share video.

Better regional programming through new super localization equipment located at BDU head ends

103. Pelmorex is currently developing its next generation of localization technology with the development of a localization unit (a PMX) that will support, not just text and graphics, but regional video and audio content as well. We are in the process of hiring additional staff to increase the volume of market and regional specific weather forecasts when the new capability is launched.
104. Initially, these “super PMX” units will permit the delivery of regional information similar to the concept of the regional feeds provided by SportsNet. Initial plans call for the roll out of test systems in 2008, followed by additional regional units in 2009. A related benefit will be an increase in the number of regional SAP channels to serve the vision impaired.

Ongoing development of interactive capabilities

105. Pelmorex continues to emphasize the development of interactive television (ITV) capabilities and applications. Our initial work has enabled ExpressVu subscribers to access interactive local or regional forecasts, and we intend to continue to expand this capability for more targeted forecasts for these DTH subscribers. As well, The Weather Network and MétéoMédia use these systems not only for providing local weather information but also for providing other information such as local school closures.

5.0 Ensuring affordable cable and satellite services for Canadians

106. Our application for digital basic carriage and to carry out the role as a national public alerting aggregator and backbone network distributor will help ensure that cable and satellite BDUs will be able to continue to provide our services in an affordable manner to Canadians for the following reasons:
 - The Weather Network and MétéoMédia will provide the services of a national public alerting aggregator and backbone network distributor at no incremental cost to subscribers;

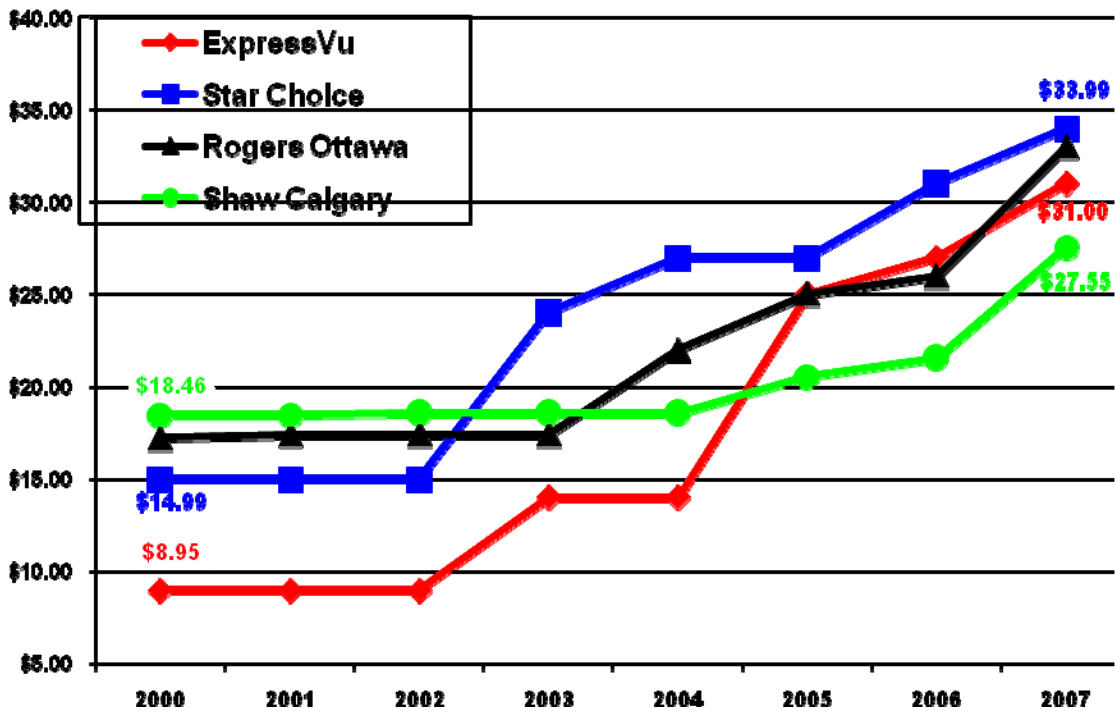
- The Weather Network and MétéoMédia are already highly affordable services on basic; and
- Without continued carriage on digital basic, The Weather Network and MétéoMédia will be more expensive for many Canadians.

5.1 The economics of the basic service have changed

107. Lack of competition among distributors governs the pricing of the basic service, and is important context to understanding the impact on consumers of changes in the distribution or price of our services.

108. Many consumers have limited ability to switch to a different BDU if they do not like the basic service offering of their current distributor. Many are locked into their BDU because of bundled pricing with telephone services or because they have agreed to a multi-year contract to defray the cost of a satellite dish or digital cable box. Some may not be able to afford the cost of a satellite dish if they currently receive cable, while others may be dependent on the BDU chosen by their apartment or condominium manager. This lack of real competition between distributors is illustrated in the following Figure 2, showing increases in basic service rates.

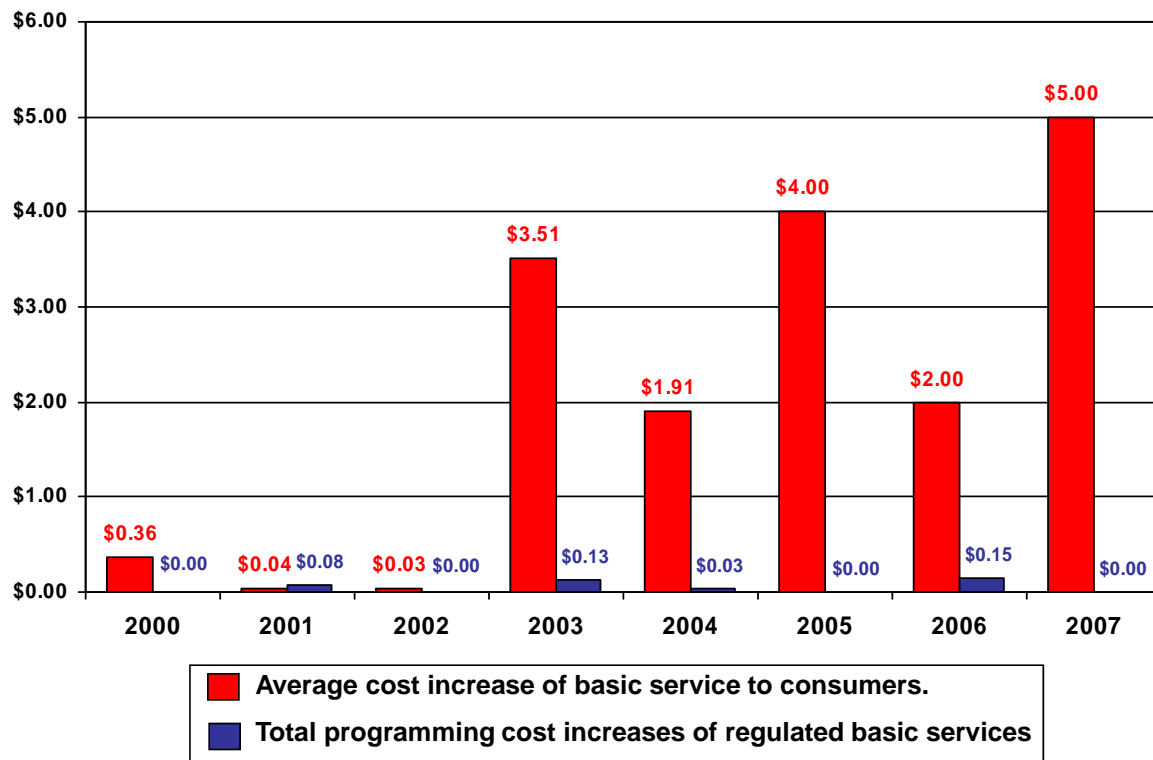
Figure 2: Monthly cost to Consumers of Basic Service



Source: MediaSTATS

109. The price of basic service and the significant increase in recent years bear little relation to changes in the wholesale fees for programming services, as demonstrated in Figure 3 which follows. Indeed, increases in the price of the basic service are often used to offset lower margins on discretionary tiers. When a programming service reduces its wholesale fee, BDUs are under no obligation to pass the savings on to consumers and will find such a move impractical in terms of revised marketing and billing costs. Therefore, if The Weather Network and MétéoMédia are forced to reduce their wholesale rate to stay on basic, consumers will derive no benefit. Even if our services are removed from basic, this savings is unlikely to be passed on to customers.

Figure 3: Comparison of the Annual Increase in Regulated Basic Programming Wholesale fees vs. Increases in the Consumer Price for Basic Service¹⁶



Source: MediaStats & CRTC

¹⁶ Average cost of the increase in basic service was calculated in June of each year for the specific BDUs presented in Figure 2 above. The basic service cost increases included any 9(1)(h) or dual status services carried on basic by these same BDUs.

5.2 We propose greater value without any increase in subscriber fee

110. The Weather Network and MétéoMédia are already highly affordable and provide good value to Canadians. They are offered today on basic at the same subscriber fee as 15 years ago - \$0.23 per month. If our rate had increased with the rate of inflation alone in this period, it would be 56% higher today. Yet without any increase in subscriber fee - inflationary or actual - we have augmented the quality of service we provide through new content acquisition, new technology applications, and increased localization of our forecasting information. We now provide forecasts down to the 10 square kilometre grid, and offer life-saving road safety, alerting and environmental information programming that was previously unavailable.
111. With this proposal, The Weather Network and MétéoMédia will enable the provision of broadcast emergency alerting services to the public at no increase in their subscriber fee. BDUs also indicated during the 2006 proceeding on public alerting said that they would be willing to pass on alerts without imposing an incremental charge on their subscribers. Approval of this application will, therefore, represent excellent value for Canadians. The Thompson Lightstone research included with our application in the 2006 ACA proceeding concluded that a majority of Canadians would be willing to pay a fee for emergency alerts. Fully (82%) of survey respondents feel that an emergency alert system would be worthwhile to them and their families even at a monthly cost of 50 cents per household.
112. Essentially, this application provides a beneficial status quo for consumers in terms of service quality and price, helps to avoid price increases, and enables alert aggregation and distribution that will facilitate the wide distribution of alerts and warnings on all platforms.

5.3 Without basic carriage, many subscribers will pay more for our services

113. In the event that a BDU were to remove our services from basic, The Weather Network and MétéoMédia would likely be packaged with other information services in bundles that could cost \$5 or more. This increase would certainly place an undue burden on the millions of Canadians outside major centres who rely on The Weather Network and MétéoMédia as their sole broadcast source of current daily weather information.
114. Even if a BDU agreed to continue to distribute our services on basic in some systems or regions, those BDUs might still face price increases to distribute The Weather Network and MétéoMédia. In Pelmorex's current business case, a subscriber in Toronto can be served at a lower cost than one in Norman Wells, NWT because of the high capital costs per head end for localization equipment. Therefore, larger systems subsidize the rates for smaller ones today, and subscribers in Coopérative de Cablodistribution de l'Isles-aux-Coudres and Coopérative de Cablodistribution de Larouche, Québec get the same quality of service as those in

Edmonton and Calgary, Alberta, at the same price. But if a larger BDU were to distribute The Weather Network or MétéoMédia on a discretionary tier, then the implicit subsidy that we provide to smaller systems would break down, and would force us to significantly raise the cost to those smaller distributors and, ultimately, their subscribers. The offer by Pelmorex of both services at a single low price across Canada would no longer make commercial sense.

115. In Quebec, MétéoMédia is one of the least expensive French-language services offered on basic cable today because it is offered at the same wholesale rate (\$0.23) as The Weather Network. Its price has been kept low because of the widespread distribution of both services on basic all across Canada. Maintaining this low wholesale rate will no longer be possible if even one major distributor moves The Weather Network off basic to a discretionary package. Pricing that reflects a true share of the French-language network costs spread over the smaller linguistic market will trigger substantial rate increases, and could threaten the viability of MétéoMédia. Without broad distribution of The Weather Network on the basic service of all larger BDUs serving Anglophone markets, the basic wholesale fee for MétéoMédia would have to be increased to approximately 40 cents per subscriber per month,¹⁷ a rate increase that would surely be difficult for BDUs and consumers to accept.
116. Pelmorex will also consider the removal of bilingual market pricing, which today offers both services for the price of one where carried on basic in bilingual markets. Thus Francophones outside Quebec and Anglophones within Quebec would face higher costs to receive our service in their mother tongue.

5.4 Other important consequences for Canadian viewers of changes in our pricing and packaging

117. There are additional negative consequences for Canadians if regulatory changes are implemented that would force Pelmorex to revise the pricing and packaging for The Weather Network and MétéoMédia.
118. First, a national voluntary broadcasting alerting system is unlikely to ever develop. Pelmorex simply cannot afford to take on the additional cost of acting as a national public alerting aggregator and backbone network distributor without the financial stability and security of digital basic carriage. Other parties who could play this role will not do so without government funding – and no funds have been allocated by current or previous governments despite years of review. The most recent federal mini-budget once again does not include funding for a national public alerting aggregator and backbone network distributor. Thus Canadians will not have the benefit of a comprehensive national broadcast alerting system.

¹⁷ Among bilingual specialty television services (Newsworld, RDI; Newsnet, LCN; MuchMusic, Musiqueplus, etc.) the basic wholesale fee authorized by the CRTC is about 85% higher on average for the French-language service than its English-language counterpart. Thus the price for MétéoMédia on a standalone basis would be about \$0.40.

119. Second, a large percentage of Canadians will no longer have ready access to vital weather warnings, provincial alerts and other safety and environmental information programming carried on our services. At best, if The Weather Network and MétéoMédia match TSN for take-up rates as discretionary services, about 30% of Canadians in systems where our specialty services are not distributed on basic will have no access to vital safety information and warnings. At worst, 50% or more of these subscribers will lose access to weather, environmental and local highway safety information. They will not receive notification that a tornado warning or severe thunderstorm warning has been issued for their area, nor will they receive road safety information, air quality reports or provincial warnings of such emergencies as floods, forest fires or tainted water.
120. Through the Digital Basic Proceeding in 2007, thousands of Canadians wrote to the Commission to say that The Weather Network and MétéoMédia are currently affordable as basic services, but will not be if they are repackaged in any way. Thousands of low-income Canadians wrote to plead for our networks to remain on the basic service, as they could not afford upgrades to their cable or satellite service. The message was clear: many Canadians, who cannot afford more than the basic package, see cable and satellite packages as luxuries. They asked the Commission to protect their right to basic weather and safety information provided by The Weather Network and MétéoMédia at the lowest possible cost.

*I am a stay-at-home mom of two-year-old twin daughters. The weather network is very important to our family for several reasons.... I don't think I will be able to afford the service, if you change this. **Diana, Cudworth, SK***

La programmation de MétéoMédia m'est importante quelque soit la période de l'année pour connaître les conditions routières et les prévisions de la journée avant de décider de prendre la route pour gagner ma vie. ... Je consulte aussi très fréquemment MétéoMédia pour les prévisions Pollen étant moi-même atteint d'allergies sévères qui m'empêchent de fonctionner à la belle saison. ... Si MétéoMédia est retiré du service de base et que des frais supplémentaires doivent être déboursés pour y accéder, malheureusement, je ne ferai plus parti des Québécois qui s'y référeront. Que ce soit via une dépense sur des appareils ou sur un service. Les priorités financières m'obligeront à me passer d'un service "essentiel" dans mon cas.

Sebastien, Sainte-Béatrix, QC

*We live in a small rural community on the west coast of Vancouver Island where many homes do not have access to the internet, cell phone or other telecommunication services. Additionally, many people in our community do not have the means to purchase extra communications like expensive satellite packages and digital cable boxes. Please support this application for the safety, security and preparedness of our residents. **Shawna, Sooke, BC***

*It is a lifesaving channel to me and my handicapped parents who rely on The Weather Network to plan their outings using Wheel Trans.... Also my parents are on a fixed income and can only afford basic cable service. The Weather Network must not become a luxury that only the rich can afford – it is a real necessity of life and must not be removed from basic cable. **Lucille, Toronto, ON***

Je suis retraité et mes revenus sont très limités. L'information de MétéoMédia est essentielle à mes prises de décisions concernant mes déplacements. Je considère que de l'information de première qualité concernant la météo est essentielle à ma sécurité et celle de beaucoup de gens âgés vivant seul.

Jacques, Ham-Sud, QC

*Our son has a developmental disability and works in a sheltered workshop, without The Weather Network I would have to coach him on what would be suitable clothing on a very cold morning, with The Weather Network he checks for himself to determine how many layers he needs to keep warm while using public transit to get to work. For people on fixed incomes any increase in cable rates would put The Weather Network out of reach. Weather forecasts in Canada are a necessity not a luxury. **Lise, Sudbury, ON***

*Je suis une mère monoparentale avec un faible revenu, je travaille à l'extérieur et j'ai besoin de suivre la température à la météo à tous les jours. Je ne puis m'offrir que le service de base par câble que je trouve très utile d'ailleurs. S'il advenait que le programme MétéoMédia ne soit plus accessible avec le service de base par câble, je n'aurais alors plus les moyens de l'écouter à la télévision. **Gabrielle, Candiac, QC***

*I am a young mother of two and a student, we have a limited income and can not afford to pay anymore than we already do for cable. We rely on the weather network on a daily basis as we live in Calgary, AB and do not have a vehicle and the weather can change hourly. **Tamara, Calgary, AB***

121. Canadians will also be affected indirectly by changes to our carriage status because as the revenues and profitability of The Weather Network and MétéoMédia decline, a logical consequence will be to focus more and more on the top 25 large markets where the vast majority of subscription and advertising revenues are generated. Programming priorities will reflect the need to focus on large markets and many planned programming improvements, such as greater localization, will no longer be practical.
122. As we noted above in our description of the economics of basic cable, consumers do not stand to benefit if BDUs negotiate lower wholesale fees, or remove our service from basic. The larger BDUs, who currently charge between \$25 and \$34 per month for basic cable service, are unlikely to revise their marketing and billing systems to pass on a price reduction for our \$0.23 service or even its removal from basic.

6.0 Conclusion

123. Pelmorex firmly believes that the nature of our programming undertaking and the vital health and safety programming that is broadcast by our two specialty services ensures that we have satisfied each of the criteria outlined PN 2006-23 for digital basic carriage. We are the only local broadcaster in hundreds of Canadians communities, and the only source of readily available local weather, road and safety information.

124. We are also fully cognizant of Canada's need for a swift, reliable and robust emergency alert system that will be available in every region of the country as a means to help ensure the safety and security of all Canadians. Pelmorex has the resources and the technical ability to expand the scope of our existing broadcasting undertaking by acting as a national public alerting aggregator and backbone network distributor for the broadcasting industry's emergency alert system. With this application, we are offering to perform the missing functions that will enable the broadcasting system to alert Canadians to imminent emergencies.

List of Appendices

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Appendix B

**Pelmorex Public Alerting
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**Processing an Alert Message through
Pelmorex's Public Alerting Aggregation & Transport System**

Appendix D

**Business Case for Digital Basic Carriage
And Public Alerting Aggregation & Transport
Assumes 9(1)(h) Application APPROVED**

Appendix E

Business Case without Digital Basic Carriage Approved

Appendix F

**Impact of Tiering the Weather Network & MétéoMédia
on Selected BDUs and Consumers**