



Telecom Notice of Consultation CRTC 2015-548

PDF version

Ottawa, 11 December 2015

File number: 8620-C12-201513416

Call for comments

Application of Basic 9-1-1 service obligations to wireless service providers that are not competitive local exchange carriers

Deadline for submission of interventions: 1 February 2016

[\[Submit an intervention or view related documents\]](#)

The Commission invites comments on whether wireless service providers that are not competitive local exchange carriers, but provide voice services, should be subject to the obligation to provide wireless Basic 9-1-1 service in all areas where they operate and where wireless Basic 9-1-1 network access services are available from the relevant incumbent local exchange carrier.

Introduction

1. Effective and timely telecommunications access to emergency services is critical to the health and safety of citizens, and is an important part of the Commission's role to ensure that Canadians have access to a world-class communication system. Over the years, the Commission has established policies to contribute to the availability of reliable and effective telecommunications access to 9-1-1 services in Canada.
2. The Commission has mandated telecommunications service providers to provide their customers with 9-1-1 service wherever provincial/territorial and municipal governments have established specialized 9-1-1 call centres known as public safety answering points (PSAPs). As a result, an estimated 98% of Canada's population currently has access to either Basic 9-1-1 or Enhanced 9-1-1 (E9-1-1) service¹ through wireline, wireless, and voice over Internet Protocol (VoIP) telephone services.
3. In certain areas of Canada, such as Newfoundland and Labrador, and parts of Yukon, only Basic 9-1-1 service is available. In other parts of the country, such as most of Yukon and all of the Northwest Territories and Nunavut, no 9-1-1 service is available, accounting for approximately 2% of

¹ Basic 9-1-1 service enables callers to be connected to call takers in PSAPs, who dispatch the appropriate emergency responders. E9-1-1 service includes Basic 9-1-1, but also automatically provides 9-1-1 call takers with the telephone number and location of the caller.

Canada's population. However, it is expected that Basic 9-1-1 service will be expanded to rural communities in Yukon in 2016, and provided to other parts of Canada in the near future.

4. A significant portion of 9-1-1 calls now come from wireless phones, since more Canadian households now subscribe exclusively to mobile wireless services (20.4%) than to wireline services (14.4%).² As well, the number of 9-1-1 calls made from wireless phones is expected to increase based on the growth rates of the number of wireless service users and consumer mobile traffic in Canada.³

Regulatory background

5. In Telecom Decision 97-8, the Commission established competitive local exchange carrier (CLEC) obligations, including the obligation for CLECs to provide 9-1-1 services to their subscribers.
6. In Telecom Decision 2003-53, the Commission set out the following 9-1-1-related obligations:

For wireless CLECs:

- In a community where the incumbent local exchange carrier (ILEC) provides basic 9-1-1 service, the wireless carrier must provide a comparable level of service.
- Provide wireless E9-1-1 service to subscribers in communities where wireless E9-1-1 network access service is available from an ILEC.
- Establish and maintain, by 14 October 2003, toll-free telephone access to and continuous staffing of at least one operation centre, in order to promptly assist authorized PSAP personnel seeking subscriber information in emergency situations.

For wireless service providers (WSPs):

- Provide subscribers with initial and periodic notification of the availability, characteristics, and limitations of the 9-1-1 service offered.
- Provide wireless E9-1-1 service to their subscribers in communities where wireless E9-1-1 network access service is available from an ILEC.

² See Section 2.0 of the CRTC's *Communications Monitoring Report 2015*.

³ See reports from the [U.S. Federal Communications Commission](#) and [Cisco Systems, Inc.](#).

- Establish and maintain, by 14 October 2003, toll-free telephone access to and continuous staffing of at least one of the WSP's operation centres, in order to promptly assist authorized PSAP personnel seeking subscriber information in emergency situations.
7. In Telecom Regulatory Policy 2009-40, the Commission noted that within North America, the wireless industry has adopted a phased approach to the provision of cell phone caller location information to PSAPs. The Commission also directed all WSPs to complete their respective implementation of wireless Phase II Stage I E9-1-1 service by 1 February 2010, wherever wireline E9-1-1 service was available across Canada.
 8. In Telecom Decision 2003-53, the Commission explicitly imposed an obligation to provide Basic 9-1-1 service on wireless CLECs where Basic 9-1-1 service is provided by the ILEC. However, it did not impose a similar obligation on WSPs. Therefore, it is appropriate for the Commission to determine whether to impose on WSPs (carriers and non-carriers) the obligation to provide wireless Basic 9-1-1 service where wireless Basic 9-1-1 network access services are available from the relevant ILEC.

Call for comments

9. In light of the above, the Commission invites comments on whether WSPs that are not CLECs, but provide voice services, should be subject to the obligation to provide wireless Basic 9-1-1 service in all areas where they operate and where wireless Basic 9-1-1 network access services are available from the relevant ILEC.

Procedure

10. The *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* (the Rules of Procedure) apply to this proceeding. The Rules of Procedure set out, among other things, the rules for the content, format, filing, and service of interventions, answers, replies, and requests for information; the procedure for filing confidential information and requesting its disclosure; and the conduct of public hearings. Accordingly, the procedure set out below must be read in conjunction with the Rules of Procedure and related documents, which can be found on the Commission's website at www.crtc.gc.ca under "[Statutes and Regulations](#)." The guidelines set out in Broadcasting and Telecom Information Bulletin 2010-959 provide information to help interested persons and parties understand the Rules of Procedure so that they can more effectively participate in Commission proceedings.
11. Interested persons who wish to become parties to this proceeding must file an intervention with the Commission by **1 February 2016**. The intervention must be filed in accordance with section 26 of the Rules of Procedure.
12. Parties are permitted to coordinate, organize, and file, in a single submission, interventions by other interested persons who share their position. Information on

how to file this type of submission, known as a joint supporting intervention, as well as a [template](#) for the accompanying cover letter to be filed by parties, can be found in Telecom Information Bulletin 2011-693.

13. All documents required to be served on parties to the proceeding must be served using the contact information contained in the interventions.
14. All parties may file replies to interventions with the Commission by **11 February 2016**.
15. The Commission encourages interested persons and parties to monitor the record of this proceeding, available on the Commission's website at www.crtc.gc.ca, for additional information that they may find useful when preparing their submissions.
16. Submissions longer than five pages should include a summary. Each paragraph of all submissions should be numbered, and the line *****End of document***** should follow the last paragraph. This will help the Commission verify that the document has not been damaged during electronic transmission.
17. Pursuant to Broadcasting and Telecom Information Bulletin 2015-242, the Commission expects incorporated entities and associations, and encourages all Canadians, to file submissions for Commission proceedings in accessible formats (for example, text-based file formats that enable text to be enlarged or modified, or read by screen readers). To provide assistance in this regard, the Commission has posted on its website [guidelines](#) for preparing documents in accessible formats.
18. Submissions must be filed by sending them to the Secretary General of the Commission using **only one** of the following means:

by completing the
[\[Intervention form\]](#)

or

by mail to
CRTC, Ottawa, Ontario K1A 0N2

or

by fax to
819-994-0218

19. Parties who send documents electronically must ensure that they will be able to prove, upon Commission request, that service/filing of a particular document was completed. Accordingly, parties must keep proof of the sending and receipt of each document for 180 days after the date on which the document is filed. The Commission advises parties who file documents by electronic means to exercise

caution when using email for the filing of such documents, as it may be difficult to establish that filing has occurred.

20. In accordance with the Rules of Procedure, a document must be received by the Commission and all relevant parties by 5 p.m. Vancouver time (8 p.m. Ottawa time) on the date it is due. Parties are responsible for ensuring the timely delivery of their submissions and will not be notified if their submissions are received after the deadline. Late submissions, including those due to postal delays, will not be considered by the Commission and will not be made part of the public record.
21. The Commission will not formally acknowledge submissions. It will, however, fully consider all submissions, which will form part of the public record of the proceeding, provided that the procedure for filing set out above has been followed.

Important notice

22. All information that parties provide as part of this public process, except information designated confidential, whether sent by postal mail, facsimile, email, or through the Commission's website at www.crtc.gc.ca, becomes part of a publicly accessible file and will be posted on the Commission's website. This includes all personal information, such as full names, email addresses, postal/street addresses, and telephone and facsimile numbers.
23. The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission, or for a use consistent with that purpose.
24. Documents received electronically or otherwise will be posted on the Commission's website in their entirety exactly as received, including any personal information contained therein, in the official language and format in which they are received. Documents not received electronically will be available in PDF format.
25. The information that parties provide to the Commission as part of this public process is entered into an unsearchable database dedicated to this specific public process. This database is accessible only from the web page of this particular public process. As a result, a general search of the Commission's website with the help of either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public process.

Availability of documents

26. Electronic versions of the interventions and other documents referred to in this notice are available on the Commission's website at www.crtc.gc.ca by using the file number provided at the beginning of this notice or by visiting the "Participate" section of the Commission's website, selecting "Submit Ideas and Comments," then selecting "our open processes." Documents can then be accessed by clicking on the links in the "Subject" and "Related Documents" columns associated with this particular notice.

27. Documents are also available from Commission offices, upon request, during normal business hours.

Commission offices

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Secretary General

Related documents

- *Filing submissions for Commission proceedings in accessible formats*, Broadcasting and Telecom Information Bulletin CRTC 2015-242, 8 June 2015
- *Filing of joint supporting interventions*, Telecom Information Bulletin CRTC 2011-693, 8 November 2011
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010
- *Implementation of wireless Phase II E9-1-1 service*, Telecom Regulatory Policy CRTC 2009-40, 2 February 2009
- *Conditions of service for wireless competitive local exchange carriers and for emergency services offered by wireless service providers*, Telecom Decision CRTC 2003-53, 12 August 2003, as amended by Telecom Decision CRTC 2003-53-1, 25 September 2003
- *Local competition*, Telecom Decision CRTC 97-8, 1 May 1997