



Telecom Order CRTC 2006-254

Ottawa, 29 September 2006

Bell Canada

Reference: Tariff Notice 6953

VoIP 9-1-1 call routing service

The application

1. The Commission received an application by Bell Canada, dated 30 May 2006, proposing revisions to its Access Services Tariff (AST) item 320, Voice over IP 9-1-1 Call Routing Service (VoIPCRS), to add a provision that would clearly identify the service as discretionary and available in parallel with its Zero-Dialed Emergency Call Routing Service (0-ECRS).

Process

2. The Commission addressed interrogatories to Bell Canada on 13 June 2006 and the company filed responses to these interrogatories, dated 4 July 2006.
3. The Commission received comments from TELUS Communications Company (TCC),¹ dated 30 June 2006, and reply comments from Bell Canada, dated 14 July 2006.

Background

4. In *Emergency service obligations for local VoIP service providers*, Telecom Decision CRTC 2005-21, 4 April 2005 (Decision 2005-21), the Commission, among other things, directed Canadian carriers supporting nomadic local voice over Internet Protocol (VoIP) services or fixed/non-native local VoIP services to implement an interim solution that would provide a level of 9-1-1 service functionally comparable to Basic 9-1-1 service in areas where 9-1-1/Enhanced 9-1-1 service was available from the incumbent local exchange carrier (ILEC). The Commission further directed Canadian carriers to ensure that a 9-1-1 call originating from a local VoIP service customer would not be routed to a public safety answering point (PSAP) that did not serve the geographic location from which the call was placed.
5. In Telecom Order CRTC 2005-245, 28 June 2005, the Commission approved on an interim basis the introduction of VoIPCRS in Bell Canada's serving territory.
6. In *VoIP 9-1-1 call routing*, Telecom Decision CRTC 2006-5, 30 January 2006 (Decision 2006-5), the Commission, among other things, directed Bell Canada to file revisions to its tariffs to allow VoIP service providers access to 0-ECRS, and to maintain its VoIPCRS until the Commission had approved its proposed tariff revisions to 0-ECRS and its customers had migrated from VoIPCRS to 0-ECRS.

¹ TCC was formerly known as TELUS Communications Inc. (TCI). Effective 1 March 2006, TCI assigned and transferred all of its assets and liabilities, including all of its service contracts, to TCC.

7. In Telecom Order CRTC 2006-168, 6 July 2006, the Commission approved Bell Canada's application on an interim basis.

TCC's comments

8. TCC requested that the Commission direct Bell Canada to allow all voice service providers, regardless of whether they provided only VoIP services or a mixture of VoIP and TDM-based² (circuit-switched) voice services, the option of relying on VoIPCRS for all of their emergency calls. TCC noted that the exception would be local 9-1-1-dialed calls from circuit-switched and fixed VoIP end-users, which would continue to be routed through the 9-1-1 network to the PSAP.
9. TCC stated that while VoIPCRS was available for emergency-dialed calls from any of their nomadic or fixed/non-native VoIP end-users, zero-dialed emergency calls from local fixed VoIP end-users would still have to rely on 0-ECRS. TCC suggested that service providers with local fixed VoIP end-users as well as nomadic and fixed/non-native VoIP end-users would either have to migrate entirely to 0-ECRS or subscribe to both Bell Canada's 0-ECRS and VoIPCRS.
10. TCC submitted that if Bell Canada were required to make VoIPCRS available for emergency calls made by customers of VoIP and circuit-switched voice services, a wireline competitive local exchange carrier (CLEC) with both circuit-switched and VoIP calls would be able to route all of its zero-dialed emergency circuit-switched calls and all of its VoIP-originated emergency calls via VoIPCRS. TCC suggested that its option would minimize both the risk of human error by the CLEC or other service provider in determining how calls should be routed and the delay in connecting the calling party to the required PSAP or emergency service provider. TCC also suggested that its option would allow a CLEC or other service provider to determine which option – VoIPCRS or 0-ECRS – would be more timely and efficient in directing emergency calls without incurring redundant costs.

Bell Canada's reply

11. In reply, Bell Canada submitted that TCC had mistaken the capabilities of its 0-ECRS service, since 0-ECRS allowed eligible customers to use the service for both emergency-dialed calls from their nomadic or fixed/non-native VoIP end-users and zero-dialed emergency calls from VoIP end-users other than nomadic and fixed/non-native VoIP end-users. Bell Canada indicated that eligible customers could use both VoIPCRS and 0-ECRS, or only 0-ECRS, to route both zero-dialed and VoIP 9-1-1 emergency calls, in contrast to TCC's understanding as noted in its comments.
12. Bell Canada was of the view that it should not have to expand the scope of its VoIPCRS service. The company noted that in Decision 2006-5, the Commission had directed all ILECs other than TCC to offer an automated dialing system for VoIP 9-1-1 calls. It also noted that the

² TDM stands for *time division multiplexing*.

Commission had directed Bell Canada to extend its 0-ECRS service to make it available to VoIP service providers for handling 9-1-1 calls placed by the latter's VoIP service customers. Bell Canada noted, further, that the Commission had subsequently permitted it to make its VoIPCRS service available on an optional basis.

13. Bell Canada submitted that it had filed its VoIPCRS service as an optional alternative to the 0-ECRS serving arrangement for handling VoIP 9-1-1 calls, and that this service was never intended to handle zero-dialed emergency calls. The company argued that no obligation existed, nor should any be imposed, for the company to alter its VoIPCRS service and associated tariff as proposed by TCC. Bell Canada submitted that it had abided by the Commission's directives to make 0-ECRS available for VoIP 9-1-1 calls, and that it should not be directed to include further options to an alternative optional service.

Commission's analysis and determinations

14. The Commission notes that Bell Canada's 0-ECRS enables competitors' operators – including those of wireless service providers, interexchange carriers, competitive pay telephone service providers, CLECs, VoIP service providers, and alternate operator service providers – to route emergency calls from end-customers to the designated PSAP or other emergency response agencies within Bell Canada territory. The Commission notes that competitors that subscribe to 0-ECRS must establish call routing databases and train their operators to route emergency calls.
15. By way of contrast, Bell Canada's VoIPCRS is available to Canadian carriers, alternate operator service providers, and VoIP service providers for the routing of 9-1-1 calls made over VoIP services defined as nomadic or fixed/non-native. With VoIPCRS, a Bell Canada VoIP 9-1-1 routing operator will obtain the location information of the end-user from a VoIP service provider 9-1-1 operator and then route the 9-1-1 call to the appropriate PSAP or other applicable emergency response agencies within Ontario and Quebec. The Commission notes that VoIPCRS is provided to competitors at a higher rate than 0-ECRS.
16. In the Commission's view, allowing competitors – whether they be VoIP- and/or TDM-based – to subscribe to VoIPCRS for their emergency calls would help reduce the risk of human error and minimize any potential delay in connecting the end-user to the required PSAP or emergency service provider. The main reason for this is that competitors would neither have to establish call routing databases, nor train their operators to route emergency calls in a territory with which they might be unfamiliar.
17. Furthermore, the Commission expects that Bell Canada would not incur significant additional costs if VoIP- and/or TDM-based competitors were permitted to choose VoIPCRS for routing all their emergency calls.
18. Accordingly, the Commission is of the view that local service providers offering both VoIP and non-VoIP services should have the option to subscribe to VoIPCRS for routing all their emergency calls from their end-customers, except for local 9-1-1-dialed calls from circuit-switched and fixed VoIP end-users, should they so choose. The Commission notes that local 9-1-1-dialed calls from circuit-switched and fixed VoIP end-users would continue to be routed through the 9-1-1 network to the PSAP.

19. In light of the above, the Commission **approves on a final basis** Bell Canada's application, with the condition that its VoIPCRS service be made available to all service providers that are eligible to obtain 0-ECRS for the routing of their customers' circuit-switched or VoIP-based emergency calls. Revised tariff pages are to be issued within 30 days of the date of this Order.

Secretary General

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