



## Telecom Notice of Consultation CRTC 2020-326

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Ottawa, 4 September 2020

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### Call for comments – Establishment of new deadlines for Canada’s transition to next-generation 9-1-1

**Deadline for submission of interventions: 19 October 2020**

**Deadline for submission of replies: 9 November 2020**

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

*Following the suspension of next-generation 9-1-1 (NG9-1-1)-related deadlines in April 2020 due to the COVID-19 pandemic, the Commission is initiating a proceeding to establish new NG9-1-1 deadlines. As a result of this proceeding, the Commission may impose obligations on some or all telecommunications service providers, including NG9-1-1 network providers, regardless of whether they choose to actively participate in the proceeding.*

#### Background

1. In Telecom Regulatory Policy 2017-182 and Telecom Decision 2019-353 (hereafter, the NG9-1-1 framework) the Commission set out determinations on the implementation of NG9-1-1 networks<sup>1</sup> and the provision of new emergency services to Canadians.
2. The Commission made its determinations with a view to achieving the following strategic objectives:
  - increasing the safety of Canadians by giving them the best access to emergency services through world-class telecommunications networks;
  - providing high-quality information, services, and support to public safety answering points (PSAPs),<sup>2</sup> which ultimately enables emergency responders to effectively assist Canadians;

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<sup>1</sup> NG9-1-1 in Canada is based on the National Emergency Number Association (NENA) i3 architecture standard (the NENA i3 standard). The Commission approved the NENA i3 standard as the NG9-1-1 architecture standard in Telecom Decision 2015-531. NG9-1-1 is an Internet Protocol (IP)-based system comprised of (i) transport infrastructure known as managed Emergency Services IP-Enabled Networks (ESInets), (ii) the functional elements and databases that replicate traditional Enhanced 9-1-1 features and functions, and (iii) additional capabilities, known as next-generation core services (NGCS).

<sup>2</sup> A primary PSAP is a PSAP to which 9-1-1 calls are routed directly as the first point of contact. In most cases, the primary PSAP then contacts the appropriate agency to dispatch emergency responders. However, in cases where local authorities determine that specialized expertise is required to handle the 9-1-1 call, such as calls for emergency medical services, 9-1-1 calls are transferred to a secondary PSAP.

- introducing NG9-1-1 solutions that are cost-effective, innovative, and transparent;
  - maintaining the existing high-quality, reliable 9-1-1 networks throughout the transition to NG9-1-1;
  - ensuring an effective and timely transition to NG9-1-1; and
  - using standards-based solutions that allow for flexibility and strive for national consistency.
3. In the NG9-1-1 framework, the Commission established, among other things, deadlines by which
- incumbent local exchange carriers (ILECs) were to establish their NG9-1-1 networks and were to be ready to provide NG9-1-1 Voice<sup>3</sup> and NG9-1-1 Text Messaging based on real-time text (RTT)<sup>4</sup> wherever PSAPs have been established in a particular region;
  - telecommunications service providers (TSPs)<sup>5</sup> and wireless service providers (WSPs) were to make the changes necessary to support NG9-1-1 Voice and NG9-1-1 Text Messaging, respectively, throughout their operating territories wherever their networks are capable of doing so;
  - ILECs were to make available to interconnecting parties and file with the Commission, for information, the interconnection specifications for the provision of NG9-1-1 Text Messaging; and
  - ILECs were to decommission their current 9-1-1 network components that will not form part of their NG9-1-1 networks.
4. Given the force majeure situation posed by the COVID-19 pandemic, the Commission suspended the NG9-1-1 deadlines established in the NG9-1-1 framework and stated a preliminary view for the establishment of new deadlines in a [letter](#) dated 8 April 2020 (hereafter, the Commission letter), as follows:

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<sup>3</sup> NG9-1-1 Voice is a service that enables the end-to-end provision of an IP-based 9-1-1 voice call, as defined under the NENA i3 standard. The service is expected, at a minimum, to provide the capabilities and functions of 9-1-1 services in place today, where technically feasible, including functions such as conference calling and calling back the person requesting emergency services following a disconnection.

<sup>4</sup> NG9-1-1 Text Messaging based on RTT will provide an alternative method for requesting emergency assistance when, for example, a voice-based call is not possible, or talking is unsafe for the caller. RTT is an IP-based text messaging service, using the Session Initiation Protocol (SIP) signalling protocol, which enables characters to be sent and received immediately as they are typed, simulating a typical real-time conversation.

<sup>5</sup> For the purposes of this notice of consultation, TSPs are also referred to as originating network providers (ONPs) and are restricted to network operators providing local voice telephony services, including traditional wireline, wireless, and local voice over Internet Protocol (VoIP) telephony networks. In the future, TSPs could be expanded to include other types of providers as new NG9-1-1 services are introduced.

- i. the dates for filing of NG9-1-1 cost studies and tariffs by NG9-1-1 network providers, from 1 June 2020 to 1 March 2021 and from 30 June 2023 to 30 March 2024, respectively;
- ii. the date at which NG9-1-1 network providers and originating network providers (ONPs)<sup>6</sup> must have their networks ready to support NG9-1-1 Voice, from 30 June 2020 to 30 March 2021;
- iii. the deadline for NG9-1-1 network providers to make available their interconnection specifications to support NG9-1-1 Text Messaging, from 30 June 2020 to 30 September 2021;
- iv. the date by which wireless service providers must provide NG9-1-1 Text Messaging based on RTT throughout their operating territories wherever their networks are capable of doing so, and PSAPs have launched NG9-1-1 Text Messaging, from 30 December 2020 to 30 March 2022;
- v. the date at which the existing 9-1-1 networks must be decommissioned, from 30 June 2023 to 30 March 2024;
- vi. the dates by which certain reports of the CRTC Interconnection Steering Committee (CISC)<sup>7</sup> Emergency Services Working Group (ESWG)<sup>8</sup> are to be submitted:
  1. ESTF0090 from 10 April 2020 to 30 September 2020;
  2. ESTF0085 from 15 May 2020 to 30 September 2020;
  3. ESTF0073b from 23 May 2020 to 27 November 2020;
  4. ESTF0091 from 15 June 2020 to 27 November 2020; and
  5. ESTF0093 from 30 June 2020 to 27 November 2020.

## Issues to be examined

5. The Commission hereby initiates a proceeding with a view to establishing new deadlines associated with the NG9-1-1 milestones at issue in the Commission letter (hereafter, the outstanding NG9-1-1 milestones). This proceeding will enable NG9-1-1 stakeholders,<sup>9</sup> as

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<sup>6</sup> For a description of ONPs, refer to footnote 5.

<sup>7</sup> CISC is an organization established by the CRTC to assist in developing information, procedures, and guidelines as may be required in various aspects of the CRTC's regulatory activities.

<sup>8</sup> The ESWG is a permanent working group under the umbrella of CISC, which deals with technical and operational issues related to 9-1-1 service in Canada. Participants include TSPs (e.g. Bell Mobility Inc., Rogers Communications Canada Inc., Shaw Communications Inc., and Videotron Ltd.), NG9-1-1 network providers (e.g. Bell Canada, Saskatchewan Telecommunications, and TELUS Communications Inc.), and PSAPs.

<sup>9</sup> NG9-1-1 stakeholders include NG9-1-1 network providers, local and provincial governments, ONPs, PSAPs, and vendors.

well as any other interested persons, to provide their views on appropriate deadlines for the execution or implementation of the outstanding NG9-1-1 milestones, including those related to the submission of ESWG reports. It will also allow stakeholders to share their views on how workforce-related and other issues arising from the COVID-19 pandemic have affected them in regard to the deployment of NG9-1-1.

6. Furthermore, in the Commission letter, the Commission expressed the preliminary view that it would be appropriate to establish a new milestone associated with the operation of NG9-1-1 networks. In this regard, the Commission introduced criteria for NG9-1-1 networks to meet to be considered in service as well as a deadline by which these criteria must be met. NG9-1-1 stakeholders and other interested persons are hereby provided with an opportunity to comment on the new milestone, including the appropriateness of the associated criteria and deadline.
7. Although PSAPs are outside the Commission's jurisdiction, they are NG9-1-1 stakeholders, and therefore the timing of their transition plans and NG9-1-1 readiness is part of overall considerations.

### **Call for comments**

8. The Commission invites comments on the issues identified above within the scope of this proceeding. Specific questions are outlined below. The Commission requests that each party set out separately its responses to each issue it chooses to address, but in one document, indicating which issue it is addressing at the beginning of each response. Parties with similar views are encouraged to file a joint submission.
9. As a result of this proceeding, the Commission may impose obligations on some or all TSPs, including NG9-1-1 network providers, regardless of whether they choose to actively participate in this proceeding.
10. The Commission acknowledges that some of the dates provided in the preliminary view in the Commission letter may lapse prior to the publication of the decision that follows this notice of consultation or soon thereafter. Parties should take this into account when commenting on this matter.
11. The Commission requests that interveners address the following questions. All responses, whether in the affirmative or negative, shall include appropriate supporting evidence and rationale.

### **Establishment of deadlines for outstanding existing NG9-1-1 milestones**

Q1. The Commission letter set out a preliminary view regarding new deadlines for key NG9-1-1 milestones.

- a. Do you agree that it is reasonable and appropriate for the Commission to direct NG9-1-1 network providers to file proposed NG9-1-1 wholesale and retail tariffs by 1 March 2021? If not, propose an alternative date. These tariffs are to include

proposed rates supported by cost studies that reflect the incremental costs of adding new NG9-1-1 networks, services, or functionalities.

- b. Do you agree that it is reasonable and appropriate for the Commission to direct NG9-1-1 network providers and ONPs to have their networks ready to support NG9-1-1 Voice by 30 March 2021? If not, propose an alternative date.
- c. Do you agree that it is reasonable and appropriate for the Commission to direct NG9-1-1 network providers to make available their interconnection specifications to support NG9-1-1 Text Messaging, and to file them with the Commission for information, by 30 September 2021? If not, propose an alternative date.
- d. Do you agree that it is reasonable and appropriate for the Commission to direct WSPs to provide, by 30 March 2022, NG9-1-1 Text Messaging based on RTT throughout their operating territories wherever (i) their networks are capable of doing so, and (ii) PSAPs have launched NG9-1-1 Text Messaging? If not, propose an alternative date.
- e. Do you agree that it is reasonable and appropriate for the Commission to direct ILECs to decommission their current 9-1-1 network components that will not form part of their NG9-1-1 networks by 30 March 2024? If not, propose an alternative date. The Commission notes that the existing 9-1-1 tariff rate regime will remain in place until current 9-1-1 networks are decommissioned. As a result, during the transition period from the current 9-1-1 framework to the NG9-1-1 framework, TSPs will be subject to both current 9-1-1 access rates and NG9-1-1 rates.
- f. Do you agree that it is reasonable and appropriate for the Commission to direct NG9-1-1 network providers to file, by 30 March 2024, proposed NG9-1-1 wholesale and retail tariffs, including proposed rates based on cost studies that include (i) costs associated with network components that were formerly included in 9-1-1 cost studies but continue to be required for the provision of NG9-1-1 services, and (ii) all other NG9-1-1-related cost components? If not, propose an alternative date.

### **Establishment of a new NG9-1-1 network in-service milestone**

Q2. The Commission letter set out a preliminary view that it would be appropriate to establish a new milestone associated with the operation of NG9-1-1 networks.

- a. Do you agree that it is reasonable and appropriate for the Commission to introduce a new milestone associated with NG9-1-1 networks being in service?
- b. Do you agree that it is reasonable and appropriate for the Commission to define “in service” as being the state in which (i) production onboarding<sup>10</sup> and testing is complete, and in which (ii) live NG9-1-1 traffic is transiting between PSAPs?

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<sup>10</sup> During the NG9-1-1 trial, ONPs and PSAPs are connected to NG9-1-1 networks in a test environment, through the trial onboarding process, where only test NG9-1-1 traffic transits over the networks. After the trial, the ONPs and PSAPs are connected to the NG9-1-1 networks in a production environment, through the production onboarding process, where live NG9-1-1 traffic will transit over the networks.

NG9-1-1 network, NG9-1-1 networks, and the originating networks capable of supporting NG9-1-1?<sup>11</sup>

- c. Do you agree that it is reasonable and appropriate for the Commission to direct all NG9-1-1 network providers to have their NG9-1-1 networks in service by 30 June 2021,<sup>12</sup> conditional on (i) the provider's NG9-1-1 service tariffs having been approved by the Commission, whether on an interim or final basis, and (ii) there being at least one PSAP to be served by the relevant NG9-1-1 network<sup>13</sup> that is ready to receive NG9-1-1 traffic? If not, propose an alternative date.
- d. If the conditions identified in paragraph c directly above have not been met by 30 June 2021, do you agree that it would be reasonable and appropriate to direct the concerned NG9-1-1 network providers to have their NG9-1-1 networks in service as soon thereafter as those conditions are satisfied?
- e. The Commission requests that NG9-1-1 network providers indicate with which PSAP(s) they will be partnering to achieve this proposed milestone.
- f. The Commission requests that PSAPs identified in response to paragraph e directly above confirm their commitment in the achievement of this proposed milestone. The Commission considers that such a commitment involves the PSAPs handling live NG9-1-1 traffic by the deadline for this proposed milestone.

### **Emergency Services Working Group reports**

Q3. The Commission letter set out a preliminary view for the submission dates of various CISC ESWG reports. Do you agree that it is reasonable and appropriate for the Commission to request that CISC submit the following reports by the following dates? If not, propose an alternative date.

- ESTF0090, regarding NG9-1-1 reliability, resiliency, and security, to be submitted by 30 September 2020;
- ESTF0085, regarding NG9-1-1 transition considerations, to be submitted by 30 September 2020;

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<sup>11</sup> In accordance with Telecom Regulatory Policy 2017-182, in which the Commission directs TSPs, throughout their operating territories, to (i) make the necessary changes to support NG9-1-1 Voice in their originating networks that are technically capable of supporting NG9-1-1 Voice, and (ii) provide NG9-1-1 Voice to their customers served by networks that are technically capable of supporting NG9-1-1 Voice wherever PSAPs have launched NG9-1-1 Voice by routing 9-1-1 calls over NG9-1-1 networks.

<sup>12</sup> This in-service date would also coincide with the effective date of the NG9-1-1 tariffs such that NG9-1-1 network providers would be able to begin recovering their investments when Canadians begin to reap the benefits of this investment.

<sup>13</sup> Small ILECS have indicated their intention to outsource part or all of the NG9-1-1 network functionality to large ILECs.

- ESTF0073b, regarding multi-line telephone systems 9-1-1 call dialing, routing, display challenges, issues, specifications, and requirements, to be submitted by 27 November 2020;
- ESTF0091, regarding NG9-1-1 additional data considerations, to be submitted by 27 November 2020; and
- ESTF0093, regarding Transition from Text with 9-1-1 to NG9-1-1 Text Messaging, to be submitted by 27 November 2020.

## Procedure

12. 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](http://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.
13. The Commission invites interventions that address the issues and questions set out above. The Commission will accept interventions that it receives on or before **19 October 2020**. Interventions must be filed in accordance with section 26 of the Rules of Procedure. Only parties that have filed interventions may file a reply to matters raised during the intervention phase. The deadline for the filing of replies is **9 November 2020**.
14. 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.
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](http://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 filing, or where required, service 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 or served. The Commission advises parties who file or serve documents by electronic means to exercise caution when using email for the service of documents, as it may be difficult to establish that service 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.
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](http://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](http://www.crtc.gc.ca) by using the public record number provided at the beginning of this notice or by visiting the "Consultations and hearings – Have your say!" section, then selecting "our applications and processes that are open for comment." 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 at the following address, upon request, during normal business hours.

Les Terrasses de la Chaudière  
Central Building  
1 Promenade du Portage  
Gatineau, Québec  
J8X 4B1  
Tel.: 819-997-2429  
Fax: 819-994-0218

Toll-free telephone: 1-877-249-2782  
Toll-free TTY: 1-877-909-2782

Secretary General

### **Related documents**

- *CISC Emergency Services Working Group – Consensus report on matters related to compatibility, reliability, resiliency, and security for next-generation 9-1-1*, Telecom Decision CRTC 2019-353, 22 October 2019
- *Next-generation 9-1-1 – Modernizing 9-1-1 networks to meet the public safety needs of Canadians*, Telecom Regulatory Policy CRTC 2017-182, 1 June 2017
- *CISC Emergency Services Working Group – Consensus report regarding a Next-Generation 9-1-1 network architecture standard for Canada*, Telecom Decision CRTC 2015-531, 30 November 2015

- *Filing submissions for Commission proceedings in accessible formats*, Broadcasting and Telecom Information Bulletin CRTC 2015-242, 8 June 2015
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010