



## Telecom Regulatory Policy CRTC 2022-234

PDF version

References: 2021-191 and 2021-191-1

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*Public record: 1011-NOC2021-0191 and 8698-NI-202201557*

### **Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing**

#### **Summary**

The Commission initiated a proceeding to determine the need for a national three-digit code for mental health crisis and suicide prevention services, to identify the existing barriers to the establishment of such a code and, if necessary, to determine how these barriers can be overcome.

The Commission **determines** that it would be appropriate to introduce a three-digit code for mental health crisis and suicide prevention services, and that 9-8-8 is to be introduced as the three-digit code to provide access to these services.

The Commission **directs** telecommunications service providers (TSPs) to

- transition to ten-digit local dialing by **31 May 2023** (except for Northwestel outside the Yellowknife local interconnection region [LIR] and for area code 506 in New Brunswick); and
- implement any other necessary changes required for the implementation of 9-8-8 by the later of **30 November 2023**, or within **six months** after the date on which the Public Health Agency of Canada files a letter with the Commission stating to which 1-8XX number calls to the three-digit code should be routed.

The Commission also **directs** TSPs that are required to implement 9-8-8 to

- file their communications plan about the transition to ten-digit local dialing with the Commission, in both official languages, for information purposes, by **30 September 2022**;
- provide communications about this transition in American Sign Language (ASL) and Langue des signes québécoise (LSQ), as well as in the languages of the Indigenous communities located in the areas that would be transitioning from seven-digit to ten-digit local dialing as a result of the introduction of the three-digit code; and

- develop and implement the awareness campaign in collaboration with the 9-8-8 operator and raise awareness about 9-8-8 service at the time the 9-8-8 operator considers appropriate to do so.

The Commission further **determines** that each TSP is to assume the costs of transitioning to ten-digit local dialing, basic switch modifications, and network changes necessary for the implementation of 9-8-8 service. In addition, the Commission imposes a condition of service, under sections 24 and 24.1 of the *Telecommunications Act* (the Act), on the provision of telecommunications services, whereby TSPs will bear the costs of calls to 9-8-8 and will not charge their end-users for accessing this service.

With respect to the ability to text directly to 9-8-8, the Commission **directs** wireless service providers (WSPs) to implement text-to-9-8-8 functionality using a common short code on the same date established by the Commission to implement 9-8-8 voice call service. The Commission also imposes a condition of service, under sections 24 and 24.1 of the Act, on the provision of mobile wireless services, whereby WSPs will bear the costs of operating text-to-9-8-8 service and will not charge their end-users for this service.

The Commission also **approves** Northwestel's Part 1 application to accommodate both seven- and ten-digit local dialing on a permissive basis in the 867 area code, except in the Yellowknife LIR, where ten-digit local dialing would be mandatory, and **directs** Northwestel to launch 9-8-8 on the same day it is to be launched in other areas.

The Commission's determinations in this proceeding will ensure a timely and efficient implementation of 9-8-8 and will provide Canadians in all regions of the country with easier and free-of-charge access to mental health crisis and suicide prevention services.

## Introduction

1. Suicide is a complex public health issue that can affect Canadians of all ages and backgrounds. Between 2017 and 2019, there were approximately 4,500 deaths by suicide in Canada annually, which represents approximately 12 deaths each day.<sup>1</sup> Overall, suicide is the ninth leading cause of death in Canada for all age groups, with some populations experiencing higher rates and risk of suicide, such as men, youth, those aged 45 to 59, those identifying as being part of the LGBTQ2 community, and certain Indigenous communities. More specifically, men represent 75% of all suicides in Canada. Suicide is the second leading cause of death among youth and young adults (15 to 34 years of age), and approximately one third of suicide deaths are among people 45 to 59 years of age.<sup>2</sup> Suicide rates among First Nations people, Métis, and Inuit are also significantly higher than the rate among non-Indigenous people. The suicide rate among First Nations people is approximately three times higher than that among non-Indigenous people. For Métis, the suicide rate is

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<sup>1</sup> See [Leading causes of death, total population, by age group](#).

<sup>2</sup> See [Suicide in Canada](#).

approximately twice as high as the rate for non-Indigenous people, and for Inuit, the rate is approximately nine times higher.<sup>3</sup>

2. In addition, the strain on mental health caused by the COVID-19 pandemic has amplified the need for improved access to mental health services. For example, a decreasing number of Canadians aged 15 and older reported excellent or very good mental health during the COVID-19 period (54%) compared to 2018 (68%). This decrease is more significant among those aged 15 to 24, where 42% reported excellent or very good mental health during the pandemic compared to 62% in 2018.<sup>4</sup> Also, 29.1% of Canadians aged 12 and older reported that their current mental health is somewhat worse or much worse compared to before the pandemic.<sup>5</sup> Easy and timely access to mental health crisis and suicide prevention services could make the difference between life and death for many Canadians.
3. There are currently many different mental health crisis and suicide prevention services available across Canada, whose scope and reach vary greatly. Some of these organizations serve municipalities, while others cover a province or territory, or span the entire country. Further, some of these organizations specialize in helping specific populations, such as children or Indigenous people. The majority of these services are accessed by dialing different seven- or ten-digit numbers.
4. Currently, Talk Suicide Canada (formerly the Canada Suicide Prevention Service), which can be reached at 1-833-456-4566, offers bilingual voice support 24 hours a day, 365 days a year, and text support provided through a common short code (CSC)<sup>6</sup> – 45645 – in English from 4 p.m. to 12 a.m. Eastern Time. This pan-Canadian service does not replace existing mental health crisis and suicide prevention services; rather, it collaborates with existing crisis centres to support improved access to these services. When residents of Quebec call Talk Suicide Canada, they are automatically rerouted to the provincial suicide prevention hotline, 1-866-APPELLE, which is available 24 hours a day, 365 days a year, and offers text and online chat services in addition to voice services.
5. When a person is in a mental health crisis situation, remembering or finding the correct seven- or ten-digit number can be especially daunting, and can prevent a person from receiving the assistance they may urgently need. The availability of an easily recognized and remembered three-digit abbreviated dialing code (three-digit code) could significantly improve access to crisis management services. In addition, the availability of a three-digit code would work towards removing the stigma associated with seeking help for mental health crises or with suicide prevention

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<sup>3</sup> See [Suicide among First Nations people, Métis and Inuit \(2011-2016\): Findings from the 2011 Canadian Census Health and Environment Cohort](#) (CanCHEC). See also the Public Health Agency of Canada's [Suicide Prevention Framework](#).

<sup>4</sup> See [Canadians report lower self-perceived mental health during the COVID-19 pandemic](#).

<sup>5</sup> See [Canadians' Health and COVID-19: Interactive Dashboard](#).

<sup>6</sup> CSCs enable wireless service subscribers to send text messages to an abbreviated number (generally made up of five or six digits).

counselling. Therefore, a three-digit code could have the same social acceptance as other three-digit codes used to request assistance or emergency services, like 8-1-1 or 9-1-1.

## **Background**

6. In 2018, the United States Congress introduced an [act](#) to require the Federal Communications Commission (FCC) to study the feasibility of designating a simple, easy-to-remember dialing code to be used for a national mental health crisis and suicide prevention hotline. In 2019, the FCC [announced](#) the implementation of 9-8-8 as the three-digit code for such a hotline. The FCC required telecommunications carriers and voice over Internet Protocol (VoIP) service providers in the United States to make necessary modifications to implement 9-8-8 service by 16 July 2022. In 2021, the FCC also [mandated](#) certain text messaging service providers to support text messaging to 9-8-8 by 16 July 2022.
7. In late 2020, a [petition](#) advocating for the launch of 9-8-8, or another three-digit number, for mental health crisis and suicide prevention services was circulated in Canada. The petition garnered over 30,000 signatures.
8. A [motion](#) to establish a national suicide prevention hotline that consolidates all suicide crisis numbers into one easy-to-remember three-digit hotline accessible to all Canadians was passed unanimously in the House of Commons on 11 December 2020.

## **Telecom Notice of Consultation 2021-191**

9. On 3 June 2021, the Commission initiated a proceeding to determine the need for a national three-digit code for mental health crisis and suicide prevention services; to identify the existing barriers to the establishment of such a code; and, if necessary, to determine how these barriers can be overcome. The Commission invited comments on these matters, expressing certain preliminary views and posing several specific questions to help inform parties' submissions.
10. Certain matters were excluded from consideration in the proceeding. In particular, given that the Commission does not have jurisdiction over the organizations that would ultimately provide the services that would be accessed using the three-digit code, matters pertaining to the governance and coordination of mental health crisis and suicide prevention organizations and the funding of their services were not considered.

11. Following a procedural request from the Deafness Advocacy Association Nova Scotia, the Newfoundland and Labrador Association of the Deaf, and the Ontario Association of the Deaf (collectively, the DHH [Deaf and Hard of Hearing] Coalition), the Commission
  - provided, in American Sign Language (ASL) and Langue des signes québécoise (LSQ), key information from Telecom Notice of Consultation 2021-191 of particular interest for Canadians who are Deaf or hard of hearing;
  - modified its general procedures for the purposes of this proceeding to invite parties to submit their interventions and replies in ASL or LSQ, in video format, if they so chose; and
  - provided extended intervention and reply periods to provide sufficient time for individuals and groups to create videos in ASL or LSQ and to ensure that all parties had the opportunity to review the transcripts of these videos.
12. The Commission received interventions from individual Canadians, Indigenous organizations, Members of Parliament, organizations providing mental health crisis and suicide prevention services, organizations representing consumer interests and Deaf, deaf-blind, or hard-of-hearing (DDBHH) Canadians, telecommunications service providers (TSPs), and various levels of government.

### **Northwestel Inc.'s Part 1 application**

13. On 5 April 2022, the Commission received a Part 1 application from Northwestel Inc. (Northwestel), in which the company requested that the Commission approve the implementation of mandatory ten-digit local dialing in the Yellowknife local interconnection region (LIR), while callers in the remainder of the 867 numbering plan area (NPA) code, which is the area code used in the Northwest Territories, Nunavut, and Yukon, would be able to use both seven-digit and ten-digit local dialing (Northwestel's Part 1 application).
14. Northwestel proposed this implementation in support of the anticipated introduction of the three-digit code under review by the Commission. Northwestel submitted that its proposal would make it possible to implement the three-digit code throughout its serving territory without the need to transition to ten-digit local dialing (except in the Yellowknife LIR) and would ensure a more efficient and faster launch of the three-digit code in its serving territory. Further, Northwestel requested that the Commission approve the request either before, or in conjunction with, the issuance of its determinations resulting from Telecom Notice of Consultation 2021-191.
15. The issues raised in Northwestel's Part 1 application are closely linked to those examined as part of this proceeding. Accordingly, the Commission hereby combines the record of Northwestel's Part 1 application with that of Telecom Notice of Consultation 2021-191, and is providing its determinations on Northwestel's Part 1 application as part of the current decision.

## Issues

16. The Commission has identified the following issues to be addressed in this decision:

- Should a national three-digit code for mental health crisis and suicide prevention services be subject to the criteria for N11 codes? If so, would it meet those criteria?
- What three-digit code should be allocated for access to mental health crisis and suicide prevention services?
- How should calls to the three-digit code be routed?
- What issues related to the implementation of the three-digit code and a transition to ten-digit local dialing need to be addressed?
- Should there be an option to send text messages to the three-digit code?
- Should the dispatchable location information of callers be made available?
- How should video relay service (VRS) and nomadic VoIP calls be handled?
- What are the specific needs of Indigenous communities and other groups?

**Should a national three-digit code for mental health crisis and suicide prevention services be subject to the criteria for N11 codes? If so, would it meet those criteria?**

## Background

17. Within the North American Numbering Plan (NANP), which provides the framework for a multi-country integrated telephone number system, unique three-digit (N11) codes are assigned to provide specific types of services, the majority of which serve the broad public interest. For example, 2-1-1 is used for public information and referral services, and 3-1-1 is used for non-emergency municipal government services.

18. In Decision 2001-475, the Commission established the following criteria for the assignment of N11 codes:

- there must be a compelling need for three-digit access that cannot be satisfied by other dialing arrangements or it is demonstrated that existing dialing arrangements are not suitable for accessing the needed services;
- the provision of N11 dialing is to be based on a need to serve the broad public interest (including providing access to the telephone network to disadvantaged individuals or groups);
- the N11 dialing should not confer a competitive advantage on the service provider(s) reached by this number;

- the assignment of an unused N11 code should be to a service or services rather than a specific organization;
  - the services to be provided through N11 dialing are to be widely available geographically and on a full-time or extended-time basis; and
  - where possible, the N11 allocation does not conflict with the NANP and is in keeping with the Canadian Steering Committee on Numbering guidelines for N11.
19. In Telecom Notice of Consultation 2021-191, the Commission expressed the preliminary view that the implementation of any three-digit code for mental health crisis and suicide prevention services, including a non-N11 three-digit code, should be subject to the criteria established for N11 codes in Decision 2001-475. The Commission invited parties to comment on this preliminary view, and on whether the implementation of a three-digit code would meet the criteria established in Decision 2001-475.

### **Application of the criteria established in Decision 2001-475 to a non-N11 three-digit code**

#### **Positions of parties**

20. All the parties that commented on this issue, namely Bell Canada et al.;<sup>7</sup> Bragg Communications Incorporated, carrying on business as Eastlink (Eastlink); la Coalition pour le service 9-1-1 au Québec (la Coalition); Distributel Communications Limited (Distributel); the Public Interest Advocacy Centre (PIAC); Quebecor Media Inc., on behalf of Videotron Ltd. (Videotron); Rogers Communications Canada Inc. (RCCI), Saskatchewan Telecommunications (SaskTel); and TekSavvy Solutions Inc. (TekSavvy), supported the Commission's preliminary view that the three-digit code should be subject to the criteria established in Decision 2001-475. Bell Canada et al. submitted that although some of these criteria are worded in a manner that specifically addresses N11 codes, the criteria are also applicable to a non-N11 three-digit code. PIAC submitted that the use of non-N11 three-digit codes should also be subject to clear and uniform standards to ensure that they are used in a manner that maximizes benefits to consumers.
21. RCCI submitted that while it supports a non-N11 code for mental health crisis and suicide prevention services, this should only be a one-time assignment and not serve as a precedent for deploying other non-N11 codes for abbreviated dialing, since that would accelerate the exhaustion of NANP numbering resources.

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<sup>7</sup> Bell Canada filed interventions on behalf of itself (including where it operates as Bell Aliant in Atlantic Canada and Bell MTS in Manitoba, and including its divisions DMTS and KMTS); Bell Mobility Inc.; Groupe Maskatel Québec L.P.; NorthernTel Limited Partnership, including its division Ontera; Northwestel; and Télébec, Société en commandite.

### **Commission's analysis**

22. The Commission is of the view that, similarly to how N11 codes are assigned to provide specific services that serve the broad public interest, the nature of the services to be accessed through this non-N11 three-digit code (i.e., mental health crisis and suicide prevention services) is consistent with the nature of the services accessed through N11 codes. As discussed further in this section, the assessment of whether such a code would meet the criteria will further support the applicability and relevance of these criteria in this case.
23. With respect to RCCI's comment that the three-digit code should be a one-time assignment of a non-N11 code, the determinations in this decision apply only to this case. Should the Commission initiate a proceeding on the assignment of another non-N11 three-digit code, or should an application be submitted in the future that requests the assignment of such a code, that application would be assessed on the basis of its own merit.
24. In light of the above, the Commission **determines** that the assignment of a non-N11 code for mental health crisis and suicide prevention services should be treated and considered in the same manner as the assignment of N11 codes, and be subject to the criteria established in Decision 2001-475.

### **Consistency of a non-N11 three-digit code with the criteria established in Decision 2001-475**

25. The parties that commented on this issue submitted that a non-N11 three-digit code would generally meet all the criteria established in Decision 2001-475.
26. Below, the Commission assesses whether such a code would meet each criterion.

**There must be a compelling need for three-digit access that cannot be satisfied by other dialing arrangements or it is demonstrated that existing dialing arrangements are not suitable for accessing the needed services, and the provision of N11 dialing is to be based on a need to serve the broad public interest (including providing access to the telephone network to disadvantaged individuals or groups)**

27. Given that these two criteria are relevant to one another, they will be addressed together.

### ***Positions of parties***

28. Bell Canada et al., la Coalition, PIAC, Videotron, RCCI, TekSavvy, and TELUS Communications Inc. (TCI) submitted that there is a compelling need for three-digit access to mental health crisis and suicide prevention services that cannot be satisfied by other dialing arrangements, and that existing dialing arrangements are not suitable for accessing these services. RCCI submitted that there is an urgent need for such a code and that there is no obvious alternative dialing arrangement that would be appropriate for mental health crisis and suicide prevention services.

29. Bell Canada et al., PIAC, and TCI also submitted that a three-digit code would be more effective and easier to remember than ten-digit numbers, particularly during moments of high stress associated with mental health crises, and thus would help to reduce barriers to access mental health crisis and suicide prevention services. Bell Canada et al. and Merit National argued that a three-digit code would reduce the stigma of seeking help for suicide prevention or mental health crisis counselling. Further, the DHH Coalition argued that a three-digit code would have the same social acceptance as other three-digit codes used to request assistance, like 8-1-1 or 9-1-1. In addition, TekSavvy submitted that the availability of mental health services varies from region to region, and that having a dedicated mental health crisis line would be a valuable tool to help people access the most appropriate service available.
30. The DHH Coalition, PIAC, RCCI, le Regroupement pour les centres de prévention du suicide du Québec (le Regroupement), TCI, TekSavvy, and Videotron submitted that a three-digit code would serve the public interest. Le Regroupement submitted that establishing such a code would increase accessibility by providing the population with improved access to mental health crisis and suicide prevention services. Videotron also argued that suicide and mental health issues increasingly affect Canadians of all ages, and that this reality justifies more than ever a quick and easy access to assistance in these matters. TekSavvy added that the need for mental health crisis and suicide prevention resources has become even more apparent during the COVID-19 pandemic.
31. In addition, TCI submitted that services provided through a three-digit code would be accessible to all Canadians regardless of geographic location or socioeconomic status. The Canada Deaf Grassroots Movement (CDGM), the Mental Health Commission of Canada (MHCC), and PIAC submitted that a three-digit code could improve access for disadvantaged individuals and groups, including youth, low-income individuals, LGBTQ2 communities, and DDBHH individuals who wish to obtain crisis counselling. Similarly, the Council of Yukon First Nations (CYFN) argued that a three-digit code would be a low-barrier-to-access solution for Indigenous citizens who are disadvantaged with regard to Internet access.

***Commission's analysis***

32. In Telecom Decision 2006-44, the Commission addressed an application from the Canadian Association for Suicide Prevention (CASP) for the assignment of the abbreviated dialing code 5-1-1 for urgent crisis intervention and suicide prevention. Ultimately, the Commission determined that CASP's application did not meet all the criteria, indicating that CASP had not demonstrated a compelling need that could not be satisfied by other dialing arrangements or that existing arrangements were not suitable. Further, the Commission noted that an N11 code for the proposed service would create a partial overlap with 2-1-1. CASP did not demonstrate that the 2-1-1 code would not be suitable for accessing the needed crisis intervention and suicide prevention services. The Commission therefore denied CASP's application.

33. However, since that decision was issued, there have been important developments that support the need for a national three-digit code for mental health crisis and suicide prevention services, including the FCC implementing 9-8-8, the unanimous House of Commons motion on the issue, and the strain that the COVID-19 pandemic has placed on overall mental health and well-being. Society's understanding of the severity and prevalence of mental health issues has evolved considerably over the last 15 years, and the introduction of a three-digit code to facilitate access to mental health crisis and suicide prevention services would be a positive and impactful step forward.
34. In addition, a three-digit code would reduce confusion for consumers and be helpful in emergency situations, such as during a time of crisis, since it would be easier to remember than a longer number.
35. Several factors support the view that existing dialing arrangements are not suitable for reaching mental health crisis and suicide prevention services and that a three-digit code should be implemented to reach these services. Because the availability of these services varies significantly from region to region, it could be difficult for a caller to find the appropriate resource promptly, particularly since there are services that do not operate on a 24-hour basis. A three-digit code would also help reduce the stigma of seeking help for suicide prevention and mental health crisis counselling, since a three-digit code has the potential to have the same social acceptance as other three-digit codes and enhance public awareness of mental health services. Additionally, having a three-digit code would help serve disadvantaged individuals and groups, since it would be accessible to all Canadians regardless of their geographic location or socioeconomic status. Specifically, people with disabilities, low-income households, racialized groups, and the LGBTQ2 youth population are segments of the population that are disproportionately affected by suicide.
36. In light of the above, the Commission is of the view that a three-digit code for mental health crisis and suicide prevention services would respond to a compelling need, and that existing dialing arrangements are not suitable. The Commission is also of the view that a three-digit code would serve the broad public interest. Accordingly, the Commission is satisfied that a three-digit code would satisfy the two above-noted criteria.

**The N11 dialing should not confer a competitive advantage on the service provider(s) reached by this number**

***Positions of parties***

37. Videotron submitted that consolidating national and provincial suicide prevention services into a single three-digit number would simplify the process for Canadians to access these services, regardless of their service provider.

38. Talk Suicide Canada submitted that it has a network of crisis centres, which has enabled the centres to support one another through the partnership, and that callers can dial the same telephone number from anywhere in Canada to access assistance.

***Commission's analysis***

39. The Commission considers that the services accessed through the three-digit code would be offered in a manner similar to how existing mental health and suicide prevention services are reached through service providers, where callers seeking crisis services dial a single number from anywhere in Canada and are then routed to a service on the basis of the area code of the number they are calling from and the availability of member call centres.
40. In light of the above, the Commission considers that introducing a three-digit code would not provide a competitive advantage to any service provider reached by the code, and is thus satisfied that a three-digit code would meet this criterion.

**The assignment of an unused N11 code should be to a service or services rather than a specific organization**

***Positions of parties***

41. PIAC, RCCI, TCI, and TekSavvy submitted that a three-digit code would provide access to a service linking callers to mental health crisis and suicide prevention services rather than to one specific organization.
42. Talk Suicide Canada stated that its services are available nationally and delivered locally by trained volunteers and staff. It added that its services include connecting to Quebec's suicide prevention service 1-866-APPELLE. Quebec residents calling Talk Suicide Canada will automatically be routed to Quebec's service.

***Commission's analysis***

43. The three-digit code would connect users to a service linking them to mental health crisis and suicide prevention services, rather than to one specific organization. Therefore, the Commission is satisfied that it would meet this criterion.

**The services to be provided through N11 dialing are to be widely available geographically and on a full-time or extended-time basis**

***Positions of parties***

44. PIAC, TCI, and TekSavvy submitted that a three-digit code would be widely available geographically and on a full-time or extended-time basis. TCI argued that if calls are routed to the existing national suicide prevention service, it is assumed that the service will continue to be available across Canada 24 hours a day, 7 days a week, and 365 days a year.

45. Talk Suicide Canada submitted that a three-digit code would continue to support its network of crisis centres that is currently accessible by all regions and populations within Canada.

***Commission's analysis***

46. The proposed three-digit code would be for a service that is available on a full-time, national basis. Therefore, the Commission is satisfied that it would meet this criterion.

**Where possible, the N11 allocation to a service does not conflict with the NANP and is in keeping with the Canadian Steering Committee on Numbering guidelines for N11**

***Positions of parties***

47. TCI, TekSavvy, and Videotron argued that a three-digit code would not conflict with the NANP and would be in keeping with Canadian Steering Committee on Numbering guidelines. RCCI submitted that the proposed three-digit code does not perfectly align with the criteria in that it is not an N11 code but an unused area code. TCI argued that since the FCC has already selected the 9-8-8 code for a similar service in the United States, the number has been removed from the NANP and is available for use in Canada as a three-digit code. Iristel Inc. (Iristel) submitted that while the proposed three-digit code could conflict with the NANP guidelines, since 9-8-8 can currently be used as a central office code (or NXX),<sup>8</sup> it does not violate this criterion in the strict sense as the criterion states that such allocation should not conflict with the NANP “where possible.” Iristel further submitted that the obstacles posed by using a non-N11 number are manageable and that the lack of an available N11 number should not be a reason to avoid using a non-N11 code if it is deemed necessary by the public health agencies and mental health experts.

***Commission's analysis***

48. The Commission is of the view that the obstacles posed by using a non-N11 number, as discussed above, should not prevent the use of such a number if it is in the public interest.
49. As further discussed in the following section, 9-8-8 would be the code selected for use. Since the FCC has designated 9-8-8 for its national mental health crisis and suicide prevention hotline, this code cannot be assigned as an area code within the NANP. Thus, its use for the same purpose in Canada would not conflict with the NANP and represents an efficient use of NANP numbering resources.
50. As such, a three-digit code would satisfy this criterion.

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<sup>8</sup> These are the three digits following the area code in a ten-digit telephone number.

## Conclusion

51. In light of all the above, the Commission is of the view that a non-N11 three-digit code for mental health crisis and suicide prevention services would (i) serve the public interest, and (ii) meet all the criteria established in Decision 2001-475. Therefore, the Commission **determines** that it would be appropriate to introduce such a code.

## What three-digit code should be allocated for access to mental health crisis and suicide prevention services?

### Background

52. In 2020, the FCC designated 9-8-8 as the three-digit code for mental health crisis and suicide prevention services to be used in the United States. The Commission expressed the preliminary view, in Telecom Notice of Consultation 2021-191, that if a three-digit code is to be used for such services in Canada, 9-8-8 should be the three-digit code for consideration. The Commission invited parties to comment on this preliminary view.
53. However, because 9-8-8 has been used as a central office (CO) code (i.e., the first three digits of a seven-digit telephone number) in certain areas, or NPA, codes in Canada, its use as a three-digit code requires ten-digit local dialing in these areas. With seven-digit local dialing, generally, once a central office code is dialed, switches are programmed to receive an additional four digits, and calls dialed with fewer than seven digits will not complete. Given that seven-digit local dialing is still the norm in certain areas in Canada, the Commission also invited parties to comment on whether Canada should move to national ten-digit local dialing in all areas in support of establishing a non-N11 national three-digit code for mental health crisis and suicide prevention services.

### Positions of parties

54. Most parties that commented on the issue agreed with the Commission's preliminary view that 9-8-8 should be the three-digit code for consideration in this proceeding.
55. The Canadian Administrator of VRS (CAV), Eastlink, the MHCC, PIAC, RCCI, and Talk Suicide Canada submitted that using the same three-digit code as used in the United States would allow for capitalization on messaging and awareness campaigns already in place there, while also avoiding any confusion that having different three-digit codes in each country could cause. Bell Canada et al. also submitted that 9-8-8 cannot be assigned as an NPA code anywhere in the countries that are part of the NANP system. This removes implementation complexity and software upgrade costs, since Bell Canada et al. will not need to build logic in their systems to distinguish between 9-8-8 as an NPA code versus 9-8-8 as a three-digit code.
56. PIAC and Videotron further submitted that implementing a non-N11 national three-digit code would not require repurposing and decommissioning any N11

number that might already be in use, which PIAC further commented would significantly reduce costs. Moreover, PIAC submitted that designating a non-N11 code like 9-8-8 would reduce the overall implementation time, and that using a unique three-digit code like 9-8-8 would be less disruptive to existing users and service providers. In addition, PIAC submitted that using 9-8-8 as the three-digit code would not add pressure on North American numbering resources, since the FCC has already assigned the code for that purpose.

57. SaskTel submitted that the Canadian N11 Notification and Implementation Guideline would generally apply to the implementation of a non-N11 three-digit code and could be modified to include the implementation of other three-digit codes.
58. Distributel submitted that there are clear benefits to selecting 9-8-8, such as consistency with the three-digit code selected in the United States and the associated benefits regarding awareness, but also clear downsides, namely implementing ten-digit local dialing in the places that still use seven-digit local dialing before the code could be implemented in those areas.
59. The majority of parties that commented on this matter supported the move to national ten-digit local dialing in all areas in support of establishing a three-digit code for mental health crisis and suicide prevention services.
60. Bell Canada et al. submitted that most areas in Canada already have ten-digit local dialing, and that subscribers in the areas that do not have it are already familiar with the concept. Bell Canada et al. also submitted that from a network perspective, the transition is not overly complicated.
61. PIAC and TBayTel submitted that the transition to ten-digit local dialing would facilitate the process for the use of other non-N11 three-digit codes.

### **Commission's analysis**

62. The Commission considers that selecting a non-N11 code, such as 9-8-8, as the three-digit code for mental health crisis and suicide prevention services provides several benefits. In particular, a non-N11 code could very likely be placed into service much sooner than a repurposed N11 code. If an N11 code were to be repurposed, it would require launching an additional proceeding to determine which number would be suitable, which would likely cause delays to the implementation of a three-digit code for mental health crisis and suicide prevention services.
63. Consistent with its preliminary view, the Commission considers 9-8-8 to be the most appropriate three-digit code. Other non-N11 codes would carry certain challenges, including placing additional pressure on NANP resources. The selection of 9-8-8 would further allow for a more cohesive public awareness campaign to be launched, since it would build upon the messaging disseminated in the United States. The Commission considers that this may encourage greater uptake by the Canadian public, reduce confusion, and reduce the risk of Canadians potentially dialing an incorrect three-digit code.

64. In addition, the use of 9-8-8 would further reduce implementation complexity and software upgrade costs, since there would not be a need to distinguish between 9-8-8 as an NPA code versus 9-8-8 as a three-digit code. The Commission considers that the selection of a three-digit code should not incur unnecessary complexity that may negatively affect its introduction.
65. However, selecting a non-N11 code such as 9-8-8 would require some areas of Canada that currently use seven-digit local dialing to transition to ten-digit local dialing. While the transition would create delays due to network upgrades, these delays would be less significant in comparison to those that would occur should an N11 number be repurposed.
66. In light of all the above, the Commission **determines** that 9-8-8 is to be introduced as the three-digit code to provide national access to mental health crisis and suicide prevention services.

## **How should calls to the three-digit code be routed?**

### **Background**

67. There are several call routing scenarios that could be used for calls to 9-8-8, such as the following:
  - routing calls directly to the various suicide prevention or crisis counselling centres;
  - using the 9-1-1/next-generation 9-1-1 (NG9-1-1) network to route calls to suicide prevention or crisis counselling centres; and
  - translating calls to a 1-8XX number and routing them using established practices for these types of calls.<sup>9</sup>
68. In Telecom Notice of Consultation 2021-191, the Commission expressed the preliminary view that 1-8XX translation, where calls are routed to a 1-8XX number using conventional call routing protocols, should be used as the routing method for calls to a three-digit code. Parties were invited to comment on this preliminary view, as well as on other matters related to the routing of these calls.

### **Positions of parties**

69. Most parties agreed with the Commission's preliminary view that 1-8XX translation should be used as the routing method for calls to a three-digit code for mental health crisis and suicide prevention services, arguing that this routing scenario would be the most effective and efficient way to implement the three-digit code. Bell Canada et al., RCCI, and Talk Suicide Canada submitted that doing so would enable the service

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<sup>9</sup> "Translation" refers to a process under which a switch determines, based on routing information stored in a switch or other telecommunications databases, how calls are to be routed so that they can progress through telecommunications networks to the appropriate destination.

to be built upon existing infrastructure and processes to the greatest extent possible, and it would not require customized network or system modifications. Bell Canada et al. and RCCI also submitted that 1-8XX translation would allow call centres to route calls differently based on the time of day and to balance call traffic between call centres.

70. The majority of parties that commented on this matter, including Bell Canada et al., Iristel, PIAC, RCCI, Talk Suicide Canada, and TCI, submitted that calls to the three-digit code should be routed to a single national toll-free number. TCI submitted that routing these calls to a single 1-8XX number would be appropriate, because a national line has already been established with the necessary expertise, systems, and processes in place. RCCI also submitted that a national toll-free number would expedite the deployment of the service and minimize the costs for all stakeholders. PIAC further submitted that having a centralized system in Canada for the three-digit code would (i) enable it to work efficiently, (ii) be the simplest structure to maintain, and (iii) be the fastest way to deploy the three-digit code.
71. La Coalition submitted that the Commission should consider using the 9-1-1 networks to route calls to the three-digit code, since it would allow for the direct transfer of calls between mental health crisis and suicide prevention service providers and emergency service providers, which would facilitate rapid and efficient dispatch of emergency services, when required.
72. Le Regroupement submitted that calls to the three-digit code should be routed directly to the different suicide prevention call centres in Quebec. It indicated that not all such call centres in Quebec have the mandate to receive calls from the provincial suicide prevention hotline (1-866-APPELLE). It argued that routing calls to the three-digit code directly to suicide prevention call centres would ensure call centres that officially represent 1-866-APPELLE are not favoured over call centres that do not.
73. Bell Canada et al. and Distributel submitted that routing calls made to the three-digit code directly to the various suicide prevention call centres or to the incumbent local exchange carriers' (ILECs) 9-1-1 networks would not be viable because it could cause routing errors and would be unduly complex and onerous to manage for TSPs.
74. Bell Canada et al. and Distributel argued that modifying the 9-1-1 networks to simultaneously handle 9-1-1 calls and calls to the new three-digit code would likely add significant complexity to the ongoing transition to NG9-1-1. Bell Canada et al. added that mental health crisis and suicide prevention calls may be lengthy, which could overload the 9-1-1 system. In addition, Iristel submitted that in Nunavut and Nunavik, local authorities have not established public safety answering points

(PSAPs).<sup>10</sup> It added that even basic 9-1-1 service is not available, and that using the 9-1-1 network to route these calls would preclude the use of the three-digit code in certain regions of Canada where it is potentially most needed.

75. Bell Canada et al., Distributel, Eastlink, Iristel, RCCI, and TCI submitted that routing calls directly to specific suicide prevention call centres would create several challenges. Bell Canada et al., Distributel, and TCI submitted that doing so would require establishing and managing very detailed route mapping, since TSPs would need routing instructions to map how calls should be routed to each call centre. RCCI added that it would be cumbersome from a network standpoint given the number of TSPs, call centres, and switching systems. Bell Canada et al. further submitted that this routing option would likely delay the service launch date and multiply the costs to be incurred. Distributel added that a single change to how calls should be routed directly to any of the mental health crisis and suicide prevention call centres would require each TSP to make a change to its routing protocols.
76. In addition, Bell Canada et al. submitted that le Regroupement's concerns can be effectively addressed if the 9-8-8 operator uses the 1-8XX translation method to route 9-8-8 calls directly to the local call centres. They noted that 1-8XX toll-free systems have the ability to dynamically route calls to many different answering call centres or terminating numbers, which would enable the call centres to work together to ensure that services are always available.

## **Commission's analysis**

### **Call routing method**

77. Given the nature of the services that would be reached through 9-8-8, it is critical that the selected call routing arrangement minimize the risk of routing errors to the fullest extent possible. The selected arrangement should also allow for a timely deployment of 9-8-8 and provide flexibility to manage changes in call routing requirements. For these reasons, the Commission does not consider that routing calls made to 9-8-8 directly to the various mental health crisis and suicide prevention call centres, or through the ILECs' 9-1-1 networks, would be appropriate.
78. Doing so would be unduly complex for TSPs and would lead to an increased probability of errors. These arrangements would require TSPs to manage detailed route mapping and many different call routing scenarios that would likely be inflexible with respect to changing requirements of mental health crisis and suicide prevention services. The calls would also be subject to routing errors due to the complexity and large range of different routing requirements. These routing scenarios would likely increase the time and costs associated with the

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<sup>10</sup> PSAPs are call centres responsible for answering calls to 9-1-1 for police, firefighting, and ambulance services. PSAPs have trained 9-1-1 operators that are responsible for dispatching the appropriate emergency services or transferring calls to the appropriate emergency response agency for the dispatch of services.

implementation of 9-8-8, incur ongoing costs, and be complex to manage should any changes in call routing be required.

79. With respect to the 9-1-1 networks, 9-1-1 systems are designed for short-duration calls with high calling volume during some emergencies (e.g., fires, car accidents, or severe weather events). However, due to their nature, mental health crisis and suicide prevention calls can be very lengthy. Therefore, the capacity of the 9-1-1 networks would likely have to be increased to prevent overloading the 9-1-1 systems. Further, 9-1-1 is in the process of being migrated to NG9-1-1 systems, and modifying the networks to simultaneously handle 9-1-1 calls and calls to the three-digit code would likely add complexity and implementation time to this transition.
80. Also, the current national suicide prevention hotline (Talk Suicide Canada) has the capability to transfer calls to 9-1-1 if required. This arrangement allows for responders to calls placed to Talk Suicide Canada to simultaneously contact a third-party emergency call centre to facilitate connection to a PSAP as needed. In these scenarios, the nearest PSAP is identified based on location information provided by the caller.
81. Since there are measures in place for current Talk Suicide Canada responders that would not introduce delays to implementation, or require immediate network infrastructure upgrades, there may not be an immediate need to require TSPs to interconnect 9-8-8 services with the 9-1-1 networks.
82. The interconnection of 9-8-8 calls with the 9-1-1 networks could be assessed at a later date, once the transition to NG9-1-1 has reached an appropriate level of maturity, and once further data is collected following the launch of 9-8-8 (e.g., call volumes being transferred, whether modifications are to be applied to location collection efforts, rollout and testing of new features, and the acquisition of specialized equipment by suicide prevention call centres).
83. Routing calls to a 1-8XX number using conventional call routing protocols is typically how calls to certain N11 codes are routed. This approach would be the most efficient and cost-effective for 9-8-8 calls, because no customized network modifications or systems would be required. In addition, based on a number of parameters, such as area code, time of day or week, and call volume, 1-8XX systems have the ability to dynamically route calls to a different telephone number (i.e., a different call centre). This approach would enable crisis centres to work together to ensure that services are always available. Routing rules could also be centrally modified when new centres join the network, or when availabilities change. This would provide more flexibility and time efficiency compared to reconfiguring TSPs' switches when there is a change in the way calls to 9-8-8 are handled by mental health crisis and suicide prevention service providers.
84. With respect to le Regroupement's concern that not all suicide prevention call centres in Quebec have the mandate to receive calls from the provincial suicide prevention hotline, this is a governance issue that is outside the Commission's

jurisdiction. Notwithstanding the above, routing 9-8-8 calls to a 1-8XX number using conventional call routing protocols would address le Regroupement's concerns by permitting the routing of calls to many different answering call centres or terminating numbers, since the organization that would be responsible for managing the calls made to 9-8-8 (the 9-8-8 operator) would be able to internally manage how calls to 9-8-8 would be routed based on their specificities.

85. Accordingly, the Commission **determines** that 1-8XX translation, where calls are routed to a 1-8XX number using conventional call routing protocols, is to be used as the routing method for 9-8-8 calls. The Commission also **determines** that interconnection of 9-8-8 calls with 9-1-1 networks is not warranted at this time.

#### **1-8XX number for call routing**

86. In addition to the call routing method, consideration needs to be given to which 1-8XX number calls to 9-8-8 would be routed, since TSPs need to know this 1-8XX number to implement the service.
87. With respect to other three-digit codes that have been implemented (i.e., N11 codes), the Canadian N11 Notification & Implementation Guideline addresses the notification, planning, and coordination for the implementation of certain N11 codes in Canada.<sup>11</sup> Based on the guideline, the organization responsible for providing the services accessed through the N11 code has to coordinate with TSPs to implement the service and provides the necessary information for call routing arrangements, including the number to which calls should be routed. The Commission is not involved in the determination of which number calls to N11 codes should be routed to, since this matter is coordinated between the N11 service operator(s) and TSPs.
88. The Public Health Agency of Canada (PHAC), the government agency responsible for overseeing the governance of Talk Suicide Canada, has confirmed, by way of a [letter](#) to the Commission, that it would provide the Commission with information regarding the termination point for calls made to the proposed three-digit code as soon as it is available. PHAC is collaborating with health and public health partners, including provincial and territorial governments, suicide prevention stakeholders, and Indigenous organizations, to determine which 1-8XX number calls to 9-8-8 should be routed to.
89. Accordingly, the Commission **determines** that calls to 9-8-8 are to be routed to the termination point (1-8XX number) determined by PHAC at a later date, once it has made such a determination.

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<sup>11</sup> These N11 codes are: 211 Community Information and Referral Services; 311 Non-emergency municipal government services; 511 Weather and traveller information; and 811 Non-urgent health tele-triage information.

## **What issues related to the implementation of the three-digit code and a transition to ten-digit local dialing need to be addressed?**

### **Background**

90. Parties were invited to provide comments on whether the three-digit code should be deployed everywhere in Canada at the same time or be subject to a phased deployment. The Commission also sought comments on what modifications, such as network changes, would be required to establish the three-digit code, as well as the associated timelines and costs.

### **Phased versus one-time national deployment**

#### **Positions of parties**

91. Many parties that commented on the issue, including Bell Canada et al., the Canadian Association of the Deaf – Association des Sourds du Canada (CAD-ASC), the CAV, la Coalition, Eastlink, Iristel, Kids Help Phone, Merit National, the MHCC, PIAC, TBayTel, and Videotron, submitted that the three-digit code should be deployed everywhere in Canada at the same time.
92. Bell Canada et al., the CAV, Eastlink, and PIAC submitted that a Canada-wide deployment with a well-coordinated public awareness campaign would reduce consumer confusion and provide uniform access to all Canadians. TBayTel also submitted that a national deployment would ensure that all Canadians have access to the service simultaneously, both where they live and in all areas where they may be travelling. La Coalition further submitted that while it supports a national deployment, another alternative would be to deploy the service by province and/or large regions (e.g., Ontario, Quebec, and the Maritimes) to allow for faster deployments in certain areas if significant delays are expected in others.
93. Bell Canada et al., the MHCC, and TBayTel added that a phased deployment would pose a public health and safety risk. Bell Canada et al. argued that such an approach could lead to help-seekers not being able to reach the assistance they need, which could have adverse consequences such as serious injury or death.
94. Some parties, including the Canadian Association of Fire Chiefs (CAFC), the Champagne and Aishihik First Nations (CAFN), the CYFN, the DHH Coalition, the Deaf Wireless Canada Consultative Committee (DWCC), Distributel, Indigenous Services Canada, RCCI, and Talk Suicide Canada, submitted that the service should be subject to a phased deployment.
95. Indigenous Services Canada argued that a phased approach would allow for adjustments to be made based on lessons learned from the initial deployment. The CAFC also argued that a phased approach would allow for individuals to benefit from the service earlier rather than delaying the entire service everywhere. Talk Suicide Canada further argued that a phased approach could provide a more orderly introduction to the service by giving more time for (i) three-digit code

service providers to gradually build capacity, (ii) technology providers to implement and test the technology, (iii) TSPs to make necessary changes to their networks, and (iv) areas that still use seven-digit local dialing time to switch to ten-digit local dialing.

96. The CAFN and CYFN submitted that an earlier deployment of the three-digit code that targets areas with limited or an absence of mental health services, such as remote Indigenous communities, would be beneficial to these areas.
97. Distributel and RCCI submitted that the three-digit code should be deployed first in all areas that currently support ten-digit local dialing. Distributel argued that while a coordinated nationwide implementation and launch would be ideal, getting the service in place quickly where feasible to do so will nonetheless benefit individuals in those areas. RCCI argued that such a phased approach balances the speed of activation of the three-digit code with its prerequisite implementation of ten-digit local dialing, and that it would bring the three-digit code to the most populated areas as soon as possible, while TSPs work in parallel on the conversion from seven-digit to ten-digit local dialing.

#### **Commission's analysis**

98. With respect to the CAFN and CYFN proposal to deploy the three-digit code first in areas with limited or an absence of mental health services, such as remote Indigenous communities, it would be challenging to accurately identify each of these areas based on this criterion, since there is no information on the record of the proceeding to enable the Commission to identify all of them. With respect to the territories, which include several of these communities, given that steps need to be taken prior to implementing 9-8-8, it is unlikely to be feasible to target these areas first if a phased deployment is deemed appropriate, since the deployment could be done faster in areas currently supporting ten-digit local dialing.
99. The Commission recognizes that deploying 9-8-8 first in areas with ten-digit local dialing would likely permit a faster deployment for the majority of Canadians who would benefit from easier access to mental health crisis and suicide prevention services. It could also provide a more orderly introduction of the service by allowing adjustments to be made based on lessons learned, while providing areas that still use seven-digit local dialing time to switch to ten-digit local dialing. However, the Commission is of the view that there will be few lessons learned during the introduction of 9-8-8, since 1-8XX translation is a very well-established process of routing calls.
100. Also, a phased approach would introduce further risks of failed attempts to reach 9-8-8 by callers who may be confused about the availability of the three-digit code in some areas. Confusion about what number to call could have significant consequences for individuals in crisis situations and be a detriment to accessing crisis services, since it could lead to help-seekers not being able to reach the assistance they need. Even though a deployment based on large regions

(e.g., by province) may help with the communication of 9-8-8 service availability, it may not eliminate possible confusion. Further, such a phased deployment would introduce inequity with respect to access to the service, including in some of the areas of the country that need it most, such as certain in Indigenous communities and areas in the territories where suicide rates are among the highest in the country.

101. Deploying 9-8-8 everywhere in Canada at the same time would provide uniform access to all Canadians, wherever they reside or travel within the country. It would also be easier to communicate to the public about the service and would cause less confusion among the public compared to a phased deployment. This approach would further public safety by reducing the risks of failed calling attempts to 9-8-8 that could lead callers not being able to reach the help they need. The Commission also considers that this approach is more equitable than a scenario where earlier access to the three-digit code is provided in areas that could implement it sooner, since it would not leave any areas or communities without access to the service.

102. In light of the above, the Commission **determines** that a uniform nationwide implementation time frame should be established.

### **Timing for implementation**

#### **Positions of parties**

##### ***Timeline for the transition to ten-digit local dialing***

103. Bell Canada et al. submitted that TSPs will first need to transition their networks to ten-digit local dialing and then reprogram and implement translations in all their switches to accept 9-8-8 as a three-digit code. Bell Canada et al. added that from a technical perspective, transitioning their networks to ten-digit local dialing could be done within nine months of a Commission determination, and that the subsequent reprogramming of the switches to implement the three-digit code could be done simultaneously.

104. RCCI submitted that six months should be provided for the transition to ten-digit local dialing, and that an additional six months should be provided to implement the three-digit code.

105. TCI submitted that the programming changes to all its switching platforms required to support national ten-digit local dialing could be completed in four to six weeks, and that it anticipated that it would require 26 weeks for the implementation of the three-digit code.

106. TBayTel submitted that the implementation of national ten-digit local dialing should occur no earlier than 18 months from the date of the Commission's decision, with an additional six months to deploy the three-digit code after ten-digit local dialing is implemented in all remaining areas. However, TBayTel indicated that it would need only nine months to transition to ten-digit local dialing, and an additional six months to implement the three-digit code.

107. Iristel anticipated that it would require several days of software development for its implementation of the three-digit code.
108. The DHH Coalition proposed that a maximum of 15 months be provided to launch the three-digit code in areas with ten-digit local dialing already implemented, 18 to 24 months to launch it in areas needing a transition to ten-digit local dialing, and a maximum of 28 months to launch it in areas needing a transition to ten-digit local dialing and 9-1-1 service launch.
109. PIAC proposed timelines similar to those established by the FCC for the transition to ten-digit local dialing and the implementation of 9-8-8 (i.e., no more than 13 months for the transition to ten-digit local dialing, and 18 months to a maximum of two years for the implementation of 9-8-8; these timelines would run concurrently).
110. Bell Canada et al., PIAC, and RCCI indicated that migration to ten-digit local dialing would also require customers such as private branch exchange (PBX) system operators and alarm companies in the affected NPAs to adjust their own equipment and become accustomed to the new dialing requirements. They submitted that the time customers may need to take to be ready for the transition needs to be considered in addition to the time required by TSPs to migrate from seven-digit to ten-digit local dialing.
111. Distributel submitted that an abbreviated awareness campaign should be used to inform affected customers about an expedited transition to ten-digit local dialing. Bell Canada et al. submitted that while it is possible to shorten the timeline for the communications campaign substantially by running a clear and concise consumer awareness campaign simultaneously for all NPAs transitioning to ten-digit local dialing, the Commission must carefully weigh the needs of customers in its assessment. RCCI, however, submitted that end-users, such as PBX system operators and alarm companies, still require the standard time interval to implement the seven-digit to ten-digit local calling conversion.
112. PIAC suggested that TSPs work with the CRTC Interconnection Steering Committee (CISC) to (i) quickly address the technical challenges associated with the transition and implement the required solutions, and (ii) prepare and submit a comprehensive transition plan for ten-digit local dialing in areas that are still using seven-digit local dialing and 9-8-8 as a CO code. Likewise, TCI proposed that CISC be requested to create a special plan for the communication and implementation of ten-digit local dialing.

***Timeline for Northwestel's transition to ten-digit local dialing***

113. In its Part 1 application, Northwestel submitted that the transition to ten-digit local dialing may be challenging in the Far North. It argued that deploying ten-digit local dialing across the entire 867 NPA would require sending technicians to 24 remote sites, 21 of which are fly-in only, and that each site visit would require two technicians for an expected average of seven days including travel time. Northwestel also submitted that there is no business need to transition to ten-digit local dialing in

the territories, since NPA 867 is not projected to exhaust until after 2043. Northwestel proposed that ten-digit local dialing be implemented in only the Yellowknife LIR, which includes the communities of Yellowknife, Behchoko, Dettah, and Whati, while the rest of the NPA accommodate both seven- and ten-digit local dialing on a permissive basis. Northwestel noted that the implementation of ten-digit local dialing in the Yellowknife LIR would be necessary because 9-8-8 is in use as a CO code in that LIR.

114. Northwestel argued that this proposal would

- simplify the implementation of ten-digit local dialing in the territories;
- enable the company to implement network changes to support the 9-8-8 service as soon as practicable and within the nine-month period proposed by Bell Canada et al.;
- avoid making customers switch their dialing behaviours or incur expenses to reprogram their telephone equipment where it would otherwise be unnecessary for them to do so; and
- ensure that customers have access to 9-8-8 without being forced to switch to ten-digit local dialing (outside the Yellowknife LIR).

115. In its intervention on Northwestel's Part 1 application, the Government of the Northwest Territories submitted that it favours an approach that does not pass costs on to network users and minimizes complications for service providers and telephone users.

#### **Commission's analysis**

116. Generally speaking, there are two steps that TSPs must perform to implement a non-N11 three-digit code: (i) TSPs operating in seven-digit local dialing areas will need to transition their networks to enable ten-digit local dialing; and (ii) TSPs will need to reprogram and implement translations in all their switches to accept 9-8-8 as a three-digit code.

#### ***Timeline for the transition to ten-digit local dialing***

117. There is already mandatory ten-digit local dialing in most NPAs in Canada, with four exceptions: New Brunswick (NPA 506),<sup>12</sup> Newfoundland and Labrador (NPA 709), northern Ontario (NPA 807), and the territories (NPA 867).

118. With respect to the transition from seven-digit to ten-digit local dialing, the Commission considers that the timelines for certain activities associated with this transition could be reduced. For instance, the Canadian NPA Relief Planning Guideline provides a three- to four-month transition period to educate

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<sup>12</sup> New Brunswick will move to ten-digit local dialing with a new NPA code being introduced by 23 April 2023.

telecommunications users to dial local calls with 10 digits, for example through network announcements that are provided to callers dialing a seven-digit number to inform them about the transition. This transition includes a phase where both seven- and ten-digit local dialing is provided on a permissive basis and lasts for about three to four months, followed by a phase where ten-digit local dialing becomes mandatory.

119. The Commission considers that many customers today are used to ten-digit local dialing, and all wireless carriers currently require ten-digit local dialing throughout Canada, which means that wireless end-users currently use ten-digit local dialing in areas where seven-digit local dialing is still the norm. Therefore, the Commission considers that the period under which both seven- and ten-digit local dialing is provided on a permissive basis could be reduced without unduly affecting end-users.
120. Accordingly, the Commission **determines** that the period under which both seven- and ten-digit local dialing is provided on a permissive basis is to be reduced to two months (except for NPA 506 in New Brunswick, which is already in the process of transitioning to ten-digit local dialing).
121. Pursuant to the Canadian NPA Relief Planning Guideline, customers are to be notified at least 18 months prior to the transition to ten-digit local dialing to provide them with time to make any necessary changes to their customer premises equipment, such as PBX, monitoring equipment, and telephone number databases, and to their contact information to include ten-digit telephone numbers, including in their printed material.
122. In light of the importance of implementing 9-8-8 in a timely manner and given that only a few areas in Canada would need to transition to ten-digit local dialing, the Commission is of the view that providing a shorter time frame to inform customers about the transition to ten-digit local dialing would be appropriate. While the transition will entail some inconvenience and costs for certain customers, the benefits of having an expedited implementation of 9-8-8 service for Canadians outweigh the inconvenience and costs associated with the changes required for certain customers.
123. TSPs indicated that, from a technical perspective, they would need between one and nine months to transition to ten-digit local dialing. The Commission considers that a nine-month transition timeline provides an appropriate balance between the need for a timely implementation of 9-8-8 service and the time TSPs require to make the necessary changes to accommodate ten-digit local dialing, while providing customers several months to prepare for this transition. Since this time frame represents the longest interval that a TSP would require to make that transition, it also minimizes the risk of TSPs not meeting the required deadline.
124. As such, the Commission **determines** that TSPs are to have nine months to transition to ten-digit local dialing in NPAs that currently have seven-digit local dialing (except in NPA 867 outside the Yellowknife LIR, as further explained below,

and NPA 506 in New Brunswick, which is already in the process of transitioning to ten-digit local dialing).

***Timeline for other network changes required to implement the three-digit code***

125. In addition to the transition to ten-digit local dialing on their networks, TSPs will need to reprogram and implement translations in all their wireline and wireless switches to accept 9-8-8 as a three-digit code throughout their networks. Certain parties (e.g., RCCI, TBayTel, and TCI) proposed an additional six-month period to implement the remaining network changes required to implement the three-digit code.
126. Implementing translations into the wireless network could be done in a relatively short period of time, given that all mobile wireless networks in Canada are IP (Internet Protocol) / SIP (Session Initiation Protocol)-based and all switches could be reprogrammed simultaneously. However, it would take longer for certain wireline networks, since they are not all IP/SIP-based and include time-division multiplexing switches that would require more programming to implement the required translations to enable a non-N11 three-digit code. The reprogramming will need to be performed individually for each of those switches.
127. Accordingly, the Commission **determines** that TSPs are to have an additional six months to reprogram and implement translations in their switches to enable access to 9-8-8 service.

***Timeline for Northwestel's transition to ten-digit local dialing***

128. In its Part 1 application, Northwestel proposed to implement the three-digit code in most parts of the territories without transitioning to ten-digit local dialing, that is, by accommodating both seven- and ten-digit local dialing on a permissive basis in NPA 867 (except for the Yellowknife LIR, where 9-8-8 is used as a CO code). This solution would enable the company to route calls to 9-8-8 to a 1-8XX number without implementing ten-digit local dialing where 9-8-8 is not deployed as a CO code.
129. While ten-digit local dialing would not be deployed on a mandatory basis everywhere in the territories, this transition is not an end in itself, and there are no evident disadvantages associated with accommodating both seven- and ten-digit local dialing outside the Yellowknife LIR: customers would not have to modify the way they dial telephone numbers, they would not have to modify their equipment to accommodate ten-digit local dialing, and they would be able to reach the three-digit code like callers elsewhere in Canada.
130. Northwestel's proposed solution would enable the company to make the three-digit code available to customers in the territories at the same time as Canadians living in the provinces, while taking into account the specificities and challenges in the territories, including those related to the communication of the transition in Indigenous languages.

131. Accordingly, the Commission **approves** Northwestel's Part 1 application, i.e., to accommodate both seven- and ten-digit local dialing on a permissive basis in NPA 867, except in the Yellowknife LIR, where ten-digit local dialing would be mandatory. For consistency with other areas where the three-digit code is being implemented, the Commission also **directs** Northwestel to enable access to the three-digit code by the same deadline provided for other areas, and launch it on the same day.

## **Conclusion**

132. In light of all the above, the Commission **directs** TSPs to

- transition to ten-digit local dialing by **31 May 2023** (except in NPA 867 outside the Yellowknife LIR, and NPA 506 in New Brunswick); and
- implement any other necessary changes required for the implementation of the three-digit code by the later of **30 November 2023**, or within **six months** after the date on which PHAC files a letter with the Commission, serving TSPs and all parties to the proceeding, stating to which 1-8XX number calls to the three-digit code should be routed, and launch the three-digit code on that date.

133. Given the important impact that the 9-8-8 service would have on Canadians, as well as the public safety risks associated with 9-8-8 being available from only a subset of TSPs, the Commission does not intend to provide any extensions beyond the date established above for the implementation of the three-digit code. The Commission expects TSPs to take all necessary measures to ensure that the three-digit code will be implemented in their networks by that date.

## **Customer awareness campaigns**

### **Positions of parties**

134. Distributel submitted that coordinating or combining an awareness campaign about an expedited transition to ten-digit local dialing with an awareness campaign about the implementation of the three-digit code could serve to amplify both messages. Bell Canada et al., Eastlink, PIAC, and RCCI, however, submitted that the awareness campaign about the transition to ten-digit local dialing should be conducted separately from any awareness campaign for the introduction of the three-digit code. PIAC argued that doing so would be easier to implement and simpler for consumers to follow. Bell Canada et al. argued that the awareness campaigns pertaining to the implementation of the three-digit code should be the responsibility of the 9-8-8 operator, since it would be in the best position to determine the appropriate timing and content of such messaging. Likewise, RCCI submitted that TSPs should echo the message, for example, by providing links on their websites to the main campaign offered by the 9-8-8 service provider.

135. The CDGM, the DWCC, and the DHH Coalition submitted that the transition to ten-digit local dialing and the implementation of the three-digit code should be communicated and explained to the DDBHH community so they can understand and be aware of the implementation of the service. The DHH Coalition also submitted that these notifications should be provided in an efficient, effective, and timely manner in videos in ASL, LSQ, and Indigenous sign languages, especially in northern Canada, and that printed material should be in plain language. The CDGM added that considerations should be given to Deaf Indigenous and DHH people who live in the territories, since they are very isolated from other DHH communities in the South.
136. The Government of the Northwest Territories submitted that transition to ten-digit local dialing would require customer education that, in view of the high cost of broadband Internet in NPA 867, could not be primarily reliant on web-based campaigns in that NPA. It also submitted that the Commission should pay specific attention to ensuring that customer notifications and notification periods respond to the particularities of northern Canada.
137. RCCI noted that in earlier Commission decisions, the time frame for N11 awareness campaigns for N11 services was six months. PIAC submitted that consumer awareness initiatives should start as soon as the network changes are implemented and should be in place at least six to seven months before the final implementation of the three-digit code.
138. TBayTel suggested that a unified consumer awareness plan and overarching implementation support from the Canadian Numbering Administrator for the local TSPs in the remaining areas would be beneficial.

### **Commission's analysis**

#### ***Customer awareness campaign about the migration to ten-digit local dialing***

139. With respect to the content of the campaign informing customers of the migration to ten-digit local dialing and associated network announcements, the industry has extensive experience in running these campaigns. Pursuant to the Canadian NPA Relief Planning Guideline, TSPs are to file their consumer awareness program with the Commission for every instance of NPA relief. Typically, these campaigns are centrally managed by the Telecommunications Alliance, and it would be possible to use past communications templates, while removing any references to the introduction of a new NPA. This would provide a simple, efficient, and well-understood communications plan that all TSPs could easily implement.
140. Given that the content of this campaign would be based on established campaigns, and to reduce the confusion around the implementation date of 9-8-8 service, the Commission considers that separate campaigns would be easier to implement and simpler for consumers to follow.

141. To avoid delays, the Commission does not need to approve the customer awareness campaign filed for the transition to ten-digit local dialing before the campaign is implemented. However, for past NPA relief processes, once the Commission has issued a decision on how relief is to be implemented, TSPs have filed with the Commission their consumer awareness program, for information purposes. Therefore, the Commission **directs** TSPs that are required to implement 9-8-8 access to file their communications plan with the Commission, in both official languages, for information purposes, by **30 September 2022**.
142. Given that DDBHH persons and certain Indigenous communities would be affected by the transition to ten-digit local dialing, the Commission **directs** TSPs to provide communications about this transition in ASL and LSQ, as well as in the languages of the Indigenous communities located in the areas that would be transitioning from seven-digit to ten-digit local dialing as a result of the introduction of the three-digit code.<sup>13</sup> The Commission also encourages TSPs to provide communications in Indigenous sign languages about the transition to ten-digit local dialing.

***Customer awareness campaign about the introduction of the three-digit code***

143. For N11 services, the educational campaign about the service provided through the N11 code is primarily the responsibility of the organization providing the service. There is little information on the record of this proceeding as to what a campaign about 9-8-8 service should include. For mental health crisis and suicide prevention services, the 9-8-8 operator would be the most appropriate entity to champion such a campaign, in collaboration with PHAC, health and public health partners, provincial and territorial governments, suicide prevention stakeholders, and Indigenous organizations. Together they would be best positioned to determine the appropriate timing and content of such messaging.
144. However, given the importance of ensuring that the public be informed about 9-8-8 service, it would be appropriate for TSPs to collaborate with the 9-8-8 operator and participate in awareness efforts for the three-digit code, for example, by conveying the messaging developed by the three-digit code operator through social media, their website, and customers' bills or billing inserts.
145. Accordingly, the Commission **directs** TSPs that are required to implement 9-8-8 access to develop and implement the awareness campaign in collaboration with the 9-8-8 operator and to raise awareness about 9-8-8 service at the time the 9-8-8 operator considers appropriate to do so.

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<sup>13</sup> ASL and LSQ content or specific messages in Indigenous languages do not need to be provided with the communications plans; the plans should, however, indicate what information would be provided in ASL/LSQ and in Indigenous languages, along with a timeline for their communication.

## Costs

### Positions of parties

146. The majority of parties that commented on the matter submitted that TSPs should bear the costs of implementing national ten-digit local dialing and deploying the three-digit code.
147. Bell Canada et al. argued that each carrier usually manages its own costs for any standard NPA relief overlay, and that while certain investments required to implement ten-digit local dialing would be advanced from their original projected timelines, these costs would nonetheless be incurred at some point in the future. They also argued that if the three-digit code is implemented by translating calls to a single toll-free number, the cost to implement the three-digit code should be borne by each carrier, similar to how the costs to implement other three-digit codes are handled today. SaskTel, TCI, and TekSavvy submitted that there would be minimal costs to transition to ten-digit local dialing. TCI added that there are no anticipated costs related to additional hardware or special vendor software loads, and all work would be carried out by TCI personnel.
148. Bell Canada et al. submitted that they would not generally seek recovery of costs associated with the deployment of 9-8-8 service, provided that the service is routed via a 1-8XX toll-free number.
149. SaskTel submitted that depending on the scope of network changes required, the 9-8-8 operator requesting the service implementation should cover any excess associated costs that TSPs may incur.
150. RCCI submitted that the Commission should follow the precedents set by earlier NPA relief and N11 abbreviated dialing code cost determinations, and that subscribers should pay for access calls and SMS, including those placed from wireless devices or payphones.
151. TBayTel submitted that any TSP that is required to move to ten-digit local dialing before, and as a direct result of, the introduction of the three-digit code should be permitted to recover its costs to do so. It also submitted that these costs should be included in the overall scope of the total costs for activities related to the implementation of the three-digit code. TBayTel argued that the resources and costs related to relief planning may not be considered or accounted for until such time that the addition of a second area code is necessary, and that the network changes required for ten-digit local dialing would not be completed or built into network evolution and capital budget planning.
152. PIAC submitted that TSPs should bear the costs associated with making their networks ready to implement the three-digit code. The DWCC submitted that operating costs for the service should be borne by TSPs or, if considerable, should be contributed to by all TSP customers in an equal, transparent manner, as is the case for 9-1-1 operation. PIAC added that it would encourage some smaller service

providers who are providing landline services in rural and remote regions to request funding from the National Contribution Fund to accommodate and cover any burdensome costs associated with implementation.

153. The CDGM and PIAC submitted that end-users should never be charged any direct per-call or network access fees to make a call to the three-digit code. PIAC argued that charging for the service would create unnecessary access barriers and discourage users, particularly low-income and vulnerable users, from using the service. Similarly, the DHH Coalition and the DWCC submitted that users should never be charged for accessing the service, that is, they should not be subject to fees for access, long distance minutes, data usage, non-voice accounts, or any other usage.
154. The DWCC also submitted that fees should be collected from subscribers to fund accessible crisis services that are nonexistent for both DDBHH and Indigenous people, to ensure there are enough services to meet as diverse a span of geography as possible in Canada.

#### **Commission's analysis**

155. With respect to the costs to be incurred by TSPs to transition to ten-digit local dialing, some investment needs to be made before their original projected timelines for certain seven-digit local dialing NPAs that are not currently within a relief planning window. However, these costs would eventually be incurred by TSPs during NPA relief implementation.
156. With respect to the costs to be incurred by TSPs to make the other necessary changes to implement 9-8-8 service, these types of costs are typically borne by each carrier in the implementation of N11 codes. Given that calls to 9-8-8 are expected to be routed to a single 1-8XX number, the routing arrangements to be implemented would be straightforward and similar to those established for certain N11 codes.
157. In addition, the Commission considers that the costs involved to implement 9-8-8 access, including those for the transition to ten-digit local dialing, would not be significant.
158. In light of the above, the Commission **determines** that each TSP is to assume the costs of transitioning to ten-digit local dialing, basic switch modifications, and network changes necessary for the implementation of 9-8-8 service.
159. With respect to PIAC's proposal for certain carriers to recover their costs through the National Contribution Fund, there is insufficient information on the record of the proceeding for the Commission to evaluate (i) which costs should be eligible, (ii) which carriers should have access to this cost recovery mechanism, and (iii) whether it would be appropriate to recover the costs from the National Contribution Fund. However, any TSP may file a Part 1 application with the Commission for the recovery of its costs, and the Commission could decide at that time whether it would agree with such a proposal.

160. With respect to the DWCC's proposal to create a new category of subscriber fees to fund accessible mental health crisis and suicide prevention services for DDBHH and Indigenous communities, the Commission does not have jurisdiction over such services, and indicated in Telecom Notice of Consultation 2021-191 that this matter is outside of the scope of this proceeding.
161. With respect to charging fees to 9-8-8 callers, callers bear the costs of certain calls to N11 services, for example, for 3-1-1 and 8-1-1 calls placed from a mobile or pay telephone. However, calls to 9-1-1 are typically provided for free. Given the importance of the service that would be accessed through 9-8-8, and that charging access fees could deter its use and adoption, it would not be appropriate to charge fees to customers to access 9-8-8 service.
162. In light of the above, the Commission imposes a condition of service, under sections 24 and 24.1 of the *Telecommunications Act* (the Act), on the provision of telecommunications services, whereby TSPs will bear the costs of calls to 9-8-8 and will not charge their end-users for accessing this service.
163. If the costs of supporting access to 9-8-8 incurred by TSPs are significant, TSPs could propose to the Commission a cost recovery plan for such costs by way of a Part 1 application.

## **Should there be an option to send text messages to the three-digit code?**

### **Background**

164. In Telecom Notice of Consultation 2021-191, the Commission invited parties to comment on whether the ability to text directly to the three-digit code should be implemented. In addition, parties were asked to comment on the advantages and challenges of implementing a texting functionality, the possible texting protocols (e.g., SMS [Short Message Service], real-time text [RTT],<sup>14</sup> or Rich Communication Services [RCS]<sup>15</sup>), and the timeline and costs associated with the implementation of the functionality.

### **Positions of parties**

165. All parties that commented on the matter generally supported the view that the ability to text directly to the three-digit code should be implemented.

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<sup>14</sup> RTT is an IP-based text messaging service. It uses the SIP signalling protocol that enables characters to be sent and received immediately as they are typed, simulating a typical real-time conversation.

<sup>15</sup> RCS is a communication protocol aimed at replacing SMS messages with a text-message system that enables more features (e.g., group chat, file transfer, IP video calls, and geo-localization).<sup>16</sup> OTT-based services are services provided by third-party providers other than TSPs, through applications that enable the provision of text messaging and the transmission of other media, such as pictures and video clips, via the Internet. Only the third-party provider has the ability to control the functionality of the service or the content. Examples of OTT messaging include Facebook Messenger and WhatsApp.

166. Most parties submitted that having a texting functionality would specifically benefit the Canadian youth population, who rely more on texting rather than voice conversations. The Canadian Wireless Telecommunications Association (CWTA), the DWCC, Indigenous Services Canada, the MHCC, and PIAC also submitted that a texting functionality could benefit other groups such as individuals with special needs or those in remote and isolated communities. L'Association de l'Ouïe de l'Outaouais, the CDGM, the DWCC, Indigenous Services Canada, and Talk Suicide Canada further submitted that texting would provide accessibility and equitable access to mental health and suicide prevention services. In addition, many parties submitted that texting offers more privacy and provides a safe alternative to individuals who do not feel comfortable having a voice call conversation.
167. Le Regroupement submitted that there is already a digital service in Quebec called [suicide.ca](http://suicide.ca) that offers an intervention service via text message, and that while Canadians in other provinces would benefit from texting to the three-digit code, an additional texting service in Quebec would create confusion. In reply to le Regroupement's comment, Bell Canada et al. submitted that while the existing 24/7 texting service is an innovative initiative by [suicide.ca](http://suicide.ca) in Quebec, a texting option to a three-digit code should be offered in Quebec, and a national educational campaign would help Quebec customers be aware of the new service.
168. With respect to which texting protocol to implement, most parties submitted that SMS would be the most suitable texting protocol because it is widely used in Canada and is universally supported by wireless devices. Bell Canada et al., the CWTA, RCCI, and TBayTel also submitted that it is too soon to comment on the feasibility of using RTT and RCS since RTT has not been launched for use with Enhanced 9-1-1 services in Canada, and RCS is still in its infancy and is only available on compatible Android devices.
169. La Coalition submitted that text messaging to the three-digit code could be implemented later when RTT is available. TCI also submitted that if the Commission wants to provide dispatchable location information with texting to the three-digit code, then SMS would not be the appropriate technology to employ, and that RTT should be considered instead when it becomes available. PIAC submitted that RCS and RTT should be considered and gradually integrated into the system if it is not possible to do so at the time of implementation, as these texting protocols would enhance communications.
170. CAD-ASC, the CDGM, and the DHH Coalition submitted that SMS, RCS, and RTT protocols should all be available for the service to be fully accessible for Canadians with disabilities, particularly the DDBHH community. The DWCC argued that RTT should be integrated for its critical real-time capabilities, which is essential in crisis situations. In reply, CAD-ASC noted the issues expressed by parties with respect to RTT and RCS, but encouraged the three-digit code service to at least be developed with RTT and RCS capability in mind, for future expansion. In addition, the DWCC

submitted that over-the-top (OTT)-based services that provide texting capabilities should be provided as options to text the three-digit code.<sup>16</sup>

171. The CWTA submitted that establishing a new CSC, which uses SMS protocol, is the only viable way to implement the texting functionality. It noted, however, that additional testing will be required to assess whether the three-digit code triggers another CSC with the same prefix. Multiple parties, including Bell Canada et al., Eastlink, RCCI, SaskTel, TBayTel, Talk Suicide Canada, and Videotron, supported the CWTA's proposal to establish a CSC for texting to the three-digit code. The CDGM, the DHH Coalition, and the DWCC supported the introduction of such a CSC, along with other means of texting for the three-digit code (e.g., RTT and RCS). The DHH Coalition argued that some parents may not give their children parental permission to register with the CAV, which means the only way they may ask for help from the three-digit hotline is by SMS texting.
172. PIAC submitted that the Commission should require TSPs to work together with CISC to review and address the technical challenges related to enabling a texting functionality and to consider the lessons from the framework and procedures from the text-with-9-1-1 process to avoid the issues of text to 9-1-1 for DDBHH persons.
173. With respect to the timing for deployment, Bell Canada et al. submitted that the texting functionality could be implemented at the same time as voice call deployment, assuming that SMS protocol is used and that the text messages are sent to an aggregator. Bell Canada et al. also submitted an alternative of deploying the texting functionality within six months of when the call centres can receive and respond to text messages. PIAC and RCCI submitted that they support deploying the texting service simultaneously with the voice service if it is technically possible to do so. PIAC also submitted that there should be a uniform nationwide deadline for implementation across Canada for all covered text messaging service providers and text messages to the three-digit code, since it will be more efficient in raising consumer awareness. The CYFN and Talk Suicide Canada submitted that if waiting for the texting functionality would delay implementation, they recommend a phased deployment wherein voice services are implemented first, followed by text services.
174. The CWTA submitted that the CSC could be provisioned on the wireless service providers' (WSPs) networks within four to six weeks after receiving all the relevant information from the 9-8-8 operator. However, it added that provisioning the CSC does not automatically make it usable, and that the 9-8-8 operator would need to undertake certain activities (e.g., securing an aggregator and ensuring that its messaging platform has sufficient capacity) in order to launch the texting functionality through the CSC, which is outside the CWTA's control. PIAC submitted that since the timeline for implementation is uncertain, it should be

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<sup>16</sup> OTT-based services are services provided by third-party providers other than TSPs, through applications that enable the provision of text messaging and the transmission of other media, such as pictures and video clips, via the Internet. Only the third-party provider has the ability to control the functionality of the service or the content. Examples of OTT messaging include Facebook Messenger and WhatsApp.

reviewed by CISC, and that mental health crisis and suicide prevention service providers and the CWTA should work together at CISC to define the timeline and the testing requirements required to set up the texting functionality.

175. With respect to costs, most parties submitted that WSPs should be responsible for their costs to implement the texting functionality. Bell Canada et al. submitted that the implementation for SMS-based texting would have minimal or negligible costs. PIAC also submitted that the operating costs for the texting service should be treated similarly to those for the voice-based service.
176. Talk Suicide Canada submitted that WSPs should ensure that the usage of the texting service is not included in customers' monthly bills. Bell Canada et al., Iristel, SaskTel, and Videotron agreed that the service should be provided at no charge to the end-user.
177. RCCI and TBayTel submitted that the decision to make the service free of charge should be a Commission policy decision. RCCI added that should the Commission mandate that the service is to be provided free of charge, RCCI would require approximately three to six months to implement the required billing system changes.

### **Commission's analysis**

178. The implementation of a texting functionality to reach mental health crisis and suicide prevention services received broad support, and there are many advantages associated with the implementation of this functionality. For instance, texting to a three-digit code would (i) provide an accessible alternative to DDBHH Canadians to access mental health and suicide preventions services, (ii) benefit younger users of telecommunications services who rely more on texting than on voice communications, and (iii) provide a safe alternative to individuals who do not feel comfortable having a voice call conversation. Given these benefits, the Commission considers that it would be appropriate to implement a texting functionality to access mental health crisis and suicide prevention services through 9-8-8.
179. With respect to the texting protocol(s) to use, SMS protocol is well known by mobile wireless end-users, widely used in Canada, and supported by all wireless devices. RCS and RTT, however, have limited availability. RCS is not supported on all devices or by all WSPs in Canada. At this time, RTT is being deployed only in NG9-1-1 networks, but the implementation timeline was suspended in Telecom Decision 2021-199 while the industry works on developing standards for its implementation. While providing a wide range of texting solutions could help enhance accessibility of the service, significant time and effort would need to be deployed to implement texting capabilities for the three-digit code with RCS or RTT. In the future, when these protocols are more widely supported and available, and if the 9-8-8 operator is able to support them, these options could be considered as alternative methods for texting to the three-digit code.

180. Accordingly, the Commission considers that SMS should be the protocol to use to text with 9-8-8.
181. Parties broadly supported using a CSC, which uses SMS protocol, to implement text-to-9-8-8 service. Using a CSC may allow, subject to testing, the use of the same three-digit code for the CSC, which would be easier for customers to remember. Talk Suicide Canada and certain other mental health crisis and suicide prevention service providers are already able to support texting using CSCs. In addition, all WSPs in Canada are able to support the use of CSCs, and the three-digit CSC could be implemented in a relatively short time frame and at minimal cost to WSPs. The Commission therefore considers that this solution would be appropriate to implement text-to-9-8-8 service.
182. With respect to the timing for implementation, the CSC could be implemented within one or two months, but would require all WSPs to establish agreements and connectivity with the CSC aggregator selected by the 9-8-8 operator. As indicated above, TSPs will have 15 months to implement the three-digit code. The Commission considers that this would give WSPs sufficient time to implement the text-to-9-8-8 functionality, including securing agreements and connectivity with the selected CSC aggregator.
183. In light of the above, the Commission considers that it would be appropriate to implement the text-to-9-8-8 functionality using a CSC, which would be the most efficient, ubiquitous, and expedient solution for implementing the functionality. The Commission therefore **directs** WSPs to implement text to 9-8-8 using a CSC on the same date established by the Commission to implement 9-8-8 voice call service.
184. With respect to the DWCC's suggestion to enable texting to the three-digit code through OTT applications with texting capabilities, using such means of communication is at the discretion of the 9-8-8 operator to determine whether they would provide services through these applications.
185. For the same reasons outlined above for voice calls to 9-8-8, WSPs should not charge fees for text messages to 9-8-8. The Commission also considers that the timeline established for the implementation of text-to-9-8-8 would give sufficient time to RCCI and other WSPs, as appropriate, to make the necessary changes to their billing systems to provide the service at no charge for end-users.
186. Accordingly, the Commission imposes a condition of service, under sections 24 and 24.1 of the Act, on the provision of mobile wireless services, whereby WSPs will bear the costs of operating text-to-9-8-8 and will not charge their end-users for this service.
187. If WSPs' costs of supporting text-to-9-8-8 service are significant, WSPs may propose to the Commission, by way of a Part 1 application, a cost recovery plan for such costs.

## Should the dispatchable location information of callers be made available?

### Background

188. The Commission noted in Telecom Notice of Consultation 2021-191 that it was unclear whether it would be feasible for the public switched telephone network to include a feature that would automatically capture the location of the caller that could then be used for emergency intervention (dispatchable location information). It also noted that while an individual calling the three-digit code may desire support and assistance in a time of mental crisis, some callers may prefer to remain anonymous and that their location not be shared, at least not at the initial time of the call. It indicated that should this information be automatically captured, it would likely raise privacy concerns and may dissuade certain individuals from using the service. The Commission invited parties to comment on this matter, with the caveat that this feature may be complex to implement and could require follow-up proceedings.

### Positions of parties

189. CAD-ASC, Eastlink, Iristel, PIAC, RCCI, TCI, Teksavvy, and Videotron submitted that calls to the three-digit code should not automatically capture dispatchable location information.

190. Eastlink and Videotron submitted that including this feature would add unnecessary complexity and cost to implementing the three-digit code. Iristel and TekSavvy submitted that the feature is not technically feasible with nomadic VoIP calls, which make up the majority of their subscribers' calls.<sup>17</sup> RCCI submitted that the capability to automatically capture dispatchable location information for calls other than 9-1-1 calls does not exist and would require industry standards and network infrastructure.

191. PIAC referenced the issues explored in the FCC's 988 Geolocation Report<sup>18</sup> including (i) whether the public switched telephone network will be able to capture dispatchable location information, (ii) the technical feasibility for providers such as mobile wireless carriers and nomadic VoIP service providers to provide the feature, (iii) whether call centres will have the necessary infrastructure to receive and route information, and (iv) the lack of interoperability with the 9-1-1 system and local PSAPs. PIAC indicated that Canada is likely to face similar technical and financial challenges, and added that there is uncertainty concerning the costs that would be incurred by different parties.

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<sup>17</sup> Nomadic VoIP service is provided over the Internet and enables callers to access telephone services using any high-speed Internet connection from any location. Nomadic VoIP service provides Basic 9-1-1 service because there is no fixed address to provide to 9-1-1 operators. The mobility of this service makes it very hard for service providers and 9-1-1 operators to pinpoint the location of a 9-1-1 call.

<sup>18</sup> The FCC's [Geolocation Report – National Suicide Hotline Designation Act of 2020](#) investigated the benefits, technical feasibility, and potential costs of capturing caller's locations when dialing 9-8-8.

192. Bell Canada et al. submitted that, for suicide prevention calls that require 9-1-1 emergency dispatch, Talk Suicide Canada currently has an arrangement in place with a third-party emergency call centre which has connections to all the PSAPs in Canada. They also indicated that if a call to a suicide prevention line escalates to an emergency that requires 9-1-1 attention, the agent from Talk Suicide Canada will call the emergency call centre and attempt to connect with the appropriate PSAP based on the location that the caller may have provided verbally, or will reach out to the voice service provider to obtain the location of the caller. Bell Canada et al. further submitted that the only method to provide automatic access to reliable dispatchable location information for 9-8-8 calls that escalate to 9-1-1 emergencies would be to physically and directly integrate NG9-1-1 networks with those that 9-8-8 operates on, and that the most feasible option in the near term would be to rely on a 1-8XX call routing scenario for the capturing of location information.
193. In addition, PIAC and RCCI submitted that this feature could be introduced in a future phase of the three-digit code. PIAC suggested that CISC initiate work on adapting Automatic Location Information / Automatic Number Information (ALI/ANI) technology for 9-8-8, but indicated that it would be difficult to currently estimate a time frame for implementation since consumer privacy and technical issues need to be considered.
194. Many parties also submitted that the automatic capture of dispatchable location information would raise privacy and confidentiality concerns that may discourage consumers from using the three-digit code. PIAC submitted that low-income and vulnerable groups could be dissuaded from calling the three-digit code out of fear of embarrassment and aversion to intervention by authorities if their location information is shared. PIAC also submitted that callers' location information should be obtained by the 9-8-8 service provider only if the caller provides express consent to do so or the caller explicitly requests for help to be sent to his or her location.
195. The CAFC, la Coalition, le Regroupement, and Talk Suicide Canada submitted that they supported calls to a three-digit code to automatically capture dispatchable location information, because it would, among other things, increase safety in emergency situations so that services can be deployed, provided that privacy considerations are met. Talk Suicide Canada submitted that it would help to streamline and enhance the transfer process in the 2 to 3% of cases where a call or SMS message is referred to 9-1-1. Le Regroupement submitted that suicide prevention call centres currently provide confidential but not anonymous telephone intervention services, and that most such centres are equipped with a telephone system that can automatically access the caller's telephone number so that the call centre can quickly trace the person's location if they are considered to be in danger of committing suicide and immediate action is required.
196. Talk Suicide Canada further submitted that a phased approach to deploying the feature is a possible solution that would allow for various factors to be considered, including weighing the time, resources, and stakeholder consultation against the benefits of geolocation. Talk Suicide Canada added that a phased approach would

increase safety and better streamline calls to the service without delaying access in the interim. In addition, through a phased approach, partners could request special clearance from the Commission due to the lifesaving services provided by Talk Suicide Canada to obtain unrestricted caller information on all calls made to the service. Furthermore, Talk Suicide Canada submitted that to obtain caller information over the public network, mobile wireless network operators would need to confirm their ability to deliver this information.

197. RCCI replied that because the FCC did not mandate the provision of dispatchable location information for 9-8-8, it is unlikely that equipment vendors would develop this unique feature solely for Canadian TSPs. TCI submitted that there are not enough details on the benefits of automatically capturing dispatchable location information on the record of this proceeding to justify having the feature.

### **Commission's analysis**

198. Several parties submitted that it would not be reasonably feasible for the public switched telephone network to automatically capture dispatchable location information that could then be used for emergency intervention. This would, instead, need to be achieved by directly connecting with the 9-1-1 networks. Specifically, the ALI database used to facilitate the collection of location data for calls placed to 9-1-1 was designed to meet explicit standards that have not yet been assessed for 9-8-8.

199. Mental health crisis and suicide prevention service centres are currently using other mechanisms to route the majority of calls to the appropriate service. For example, Talk Suicide Canada is currently able to route calls based on the caller's NPA and CO code. In this scenario, the location of the caller would be generalized to the exchange or coverage area of the caller's home NPA and CO code, as opposed to the exact physical location of the caller. A caveat to this approach would be the inability of the entity managing the three-digit code to decipher whether a caller's actual location matches their NPA and CO code if the end-user is using a nomadic VoIP service or is a mobile wireless service user outside their NPA.

200. In addition, numerous callers contact crisis lines in part due to the anonymity afforded to them. The Commission recognizes that seconds are precious when considering the nature of the calls placed to a suicide prevention service, especially when connecting callers via indirect interconnection to emergency services (i.e., 9-1-1) by the counsellor responding to the call. Mental health concerns continue to be stigmatized, and automatically capturing callers' geolocation and personal details may act as a deterrent for end-users seeking assistance. Mental health crisis and suicide prevention service providers, such as Talk Suicide Canada, have processes in place to protect the anonymity and privacy of callers, while being able to escalate the call to emergency services when it is deemed necessary by the counsellor. For example, Talk Suicide Canada has the capability to transfer calls to 9-1-1 if required. This arrangement allows for responders to calls placed to Talk Suicide Canada to simultaneously contact a third-party emergency call centre to facilitate connection to a PSAP as needed.

201. Given the above, the Commission considers that the privacy concerns related to the automatic collection of dispatchable location information, as well as the related technical challenges, outweigh the benefits of collecting such information. The Commission also considers that the expeditious implementation of the service is of utmost importance, and that network improvements can be made at a later date if necessary.

202. Therefore, the Commission **determines** that dispatchable location information is not to be automatically collected during calls to 9-8-8.

## **How should VRS and nomadic VoIP calls be handled?**

### **Background**

203. In Telecom Notice of Consultation 2021-191, the Commission noted that callers using VRS and nomadic VoIP service cannot access most N11 services because these types of calls do not provide the necessary location information for them to be routed to the appropriate recipient. It stated that options to address this issue, such as using an approach similar to the one used for 9-1-1 calls from fixed/non-native<sup>19</sup> and nomadic local VoIP services, whereby calls are triaged and handled by a third-party call centre, would need to be explored. The Commission therefore invited parties to comment on how VRS and nomadic VoIP calls to the three-digit code should be treated.

### **Positions of parties**

204. Many parties, including Bell Canada et al., CAD-ASC, Iristel, PIAC, RCCI, and TekSavvy, submitted that routing VRS and nomadic VoIP calls to the three-digit code to a single toll-free number is the most suitable approach to handle these types of calls.

### **Nomadic VoIP calls to the three-digit code**

205. Bell Canada et al., RCCI, and SaskTel submitted that calls to the three-digit code from nomadic VoIP service users could be implemented in the same manner as other calls to this number from non-nomadic VoIP services. Bell Canada et al. argued that the rationale for requiring TSPs to have a third-party emergency call centre for nomadic VoIP 9-1-1 calls is that there is no location information available for these calls. For 9-1-1 to work with nomadic VoIP services, the call must be routed by the third-party emergency call centre to the appropriate local PSAP. Bell Canada et al. and Distributel argued that having a local call centre handle calls to the three-digit code may not be the most important issue, and that it would be more important that the call be answered by trained suicide prevention counsellors, rather than by an agent seeking to reroute the call. Distributel added that this approach would allow calls to be triaged immediately and without any potential barriers (e.g., being first

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<sup>19</sup> Fixed/non-native VoIP service involves the use of a telephone number that is not associated with any of the exchanges within a customer's PSAP serving area.

required to provide information to a third-party call centre) that may lead the caller to abandon the call. Bell Canada et al. further submitted that once the call is answered by a trained professional, if it makes sense to dispatch local emergency services to the caller's location, there can be a mechanism for the suicide prevention call centre to transfer the call to a local PSAP, as is done today.

206. TBayTel submitted that if the Commission's determination for treating nomadic VoIP calls involves a similar approach to that currently being used for 9-1-1 calls, appropriate modifications to the existing agreements for 9-1-1 triaging between third parties and originating network providers would need to be made to include calls to the three-digit code.

#### **VRS calls to the three-digit code**

207. Bell Canada et al. and RCCI submitted that access to mental health crisis and suicide prevention services through the three-digit code for VRS users should be provided using the same processes in place today for users of VRS. Bell Canada et al. argued that these processes are already developed, well understood by VRS users, and feasible to implement ubiquitously across the country.

208. The CAV submitted that it does not anticipate material obstacles if implementation of the three-digit code involves call routing to a single toll-free number. It indicated that when the code becomes available from its VoIP service provider, the CAV would begin testing the routing of this code over the SRV (service de relais video) Canada VRS network. It also indicated that the code could be implemented in its network within a six- to twelve-months interval. The CAV noted, however, that this time frame does not take into consideration the development of service functionality to address specific requirements established by the Commission or by other entities. The CAV further submitted that the network architecture it currently uses to route 9-1-1 calls may provide a model for routing calls placed using the three-digit code, that is, establishing a separate call queue with a priority per the Commission's determination, with calls then being routed to the next available qualified video interpreter. In addition, the CAV submitted that introduction of the three-digit code may require the organization to increase the number of video interpreters and provide special training for them, or to develop processes to address issues such as longer call durations and emergency call management.

209. CAD-ASC, supported by PIAC, submitted that to best determine if the solution to accessing the three-digit code through the SRV Canada VRS network is ideal for its users, an initial pilot group of DDBHH VRS users should participate in testing this service before it is released to the general public. The CDGM and the DWCC indicated that it may be reasonable to have an 18-month phased implementation plan for the three-digit VRS configuration.

210. CAD-ASC and the DHH Coalition, supported by the DWCC, also submitted that the VRS system must treat calls to the three-digit code the same way as it does 9-1-1 calls, that is, to determine the highest priority call to connect the caller to the next

available video interpreter. CAD-ASC and the DWCC further submitted that the CAV would be required to provide specific training for the video interpreters to prepare them for the high-stress environment facilitating communication between the caller in crisis and counsellors. In addition, the CDGM and the DHH Coalition submitted that the National Contribution Fund should cover all the CAV's expenses related to VRS calls made to the three-digit code. The DHH Coalition added that these funds should be in addition to those already provided to the CAV for its existing services.

211. Furthermore, CAD-ASC, the CDGM, the DHH Coalition, and the DWCC submitted that the VRS application must change so that its landing page has a button to call the three-digit code directly. CAD-ASC added that the SRV Canada VRS application should not consume users' data allotments. It argued that this would ensure that during a crisis, DDBHH users will not have a video call cut short if they run out of data.
212. TBayTel submitted that the CAV should be responsible for determining the complexities of VRS functionality with the three-digit code and establishing a framework for its implementation. TBayTel proposed that the CAV submit a report, prepared in consultation with representatives of the DDBHH communities, outlining its recommendations on implementation, availability, performance metrics, costs, and funding structure. The CDGM, the DHH Coalition, and PIAC submitted that CISC should work with the CAV to address this issue. The DHH Coalition added that TSPs, 7-1-1 / IP relay service providers, and organizations of, for, and by DHH consumers should also join the CAV and CISC in this process, and that the scope of issues to be assessed should expand from just VRS calls to the three-digit code to the broader questions of making the hotline in its entirety DHH-friendly and accessible.

## **Commission's analysis**

### **Nomadic VoIP calls to the three-digit code**

213. The Commission's view is consistent with that of parties in that priority should be given to providing mental health support for people calling the three-digit code, rather than determining where the calls should be routed. Routing nomadic VoIP calls first to a third-party call centre before rerouting them to a mental health crisis and suicide prevention service would delay the intervention of counsellors, and may increase the risk of the caller abandoning the call. Also, calls to the three-digit code are to be centrally routed to the same toll-free number, and this scenario would ensure that every call, including those from nomadic VoIP services, would be handled by trained counsellors. Should any nomadic VoIP calls need to be transferred to 9-1-1, Talk Suicide Canada and other mental health crisis and suicide prevention call centres already have processes and arrangements in place to allow the escalation of calls between them and emergency services.
214. Accordingly, the Commission **determines** that calls to 9-8-8 from nomadic VoIP service users are to be implemented in the same manner as other calls to the

three-digit code from non-nomadic VoIP service users, and that it would not be necessary to mandate a different type of call routing arrangement for these types of calls.

#### **VRS calls to the three-digit code**

215. For the same reasons outlined above for nomadic VoIP services, it would not be appropriate to add another step for VRS users by requiring them to go through a third-party call centre before being able to access mental health crisis and suicide prevention services. VRS users are currently able to access these services through VRS and they will continue to be able to do so through the VRS when 9-8-8 is implemented. Routing VRS calls to 9-8-8 to the same toll-free number would ensure that VRS calls are handled by trained counsellors, like all calls to 9-8-8, and processes are in place for calls to be escalated to emergency services, as required.
216. Accordingly, the Commission **determines** that VRS calls to 9-8-8 are to be implemented in the same manner as other calls to 9-8-8, and that it would not be necessary to mandate a different type of call routing arrangement for these types of calls.

#### **Other proposed modifications to VRS to address the introduction of the three-digit code**

217. While improvements could be made to enable DDBHH Canadians to reach mental health crisis and suicide prevention services in a more efficient manner, the way VRS is currently implemented enables VRS callers to reach such services. The CAV's underlying service provider would be responsible for implementing the appropriate routing protocols to its systems so that calls to 9-8-8 are routed to the appropriate toll-free number. As such, the CAV would not have to implement any specific routing arrangements for VRS calls to be routed to mental health and suicide prevention services through 9-8-8.
218. With respect to (i) establishing a new VRS call priority queue for calls to the three-digit code, and (ii) modifying the VRS application to add a button to reach the three-digit code directly, it may be appropriate for the CAV to consider whether such enhancements should be provided to VRS in the future, in collaboration with DDBHH VRS users.
219. In Telecom Notice of Consultation 2021-102, the Commission initiated a proceeding to review VRS. As such, should the CAV consider that any changes to the VRS regulatory framework or to its funding are required following the introduction of 9-8-8, the CAV has the opportunity to present its arguments about the changes it considers necessary as part of that proceeding.
220. In light of the above, the Commission encourages the CAV to consider, in collaboration with DDBHH communities, what modifications to VRS and the associated application should be implemented with the introduction of 9-8-8 service.

## **What are the specific needs of Indigenous communities and other groups?**

### **Background**

221. The Commission noted in Telecom Notice of Consultation 2021-191 that certain segments of the Canadian population were identified as being more at risk of self-harm. While the delivery of services to which 9-8-8 would be assigned is not within its jurisdiction, the Commission nonetheless considers it important to highlight submissions made to address the particular needs of equity-denied groups such as Indigenous communities and DDBHH communities.

### **Positions of parties**

#### **Indigenous communities**

222. Alberta Health Services' Addiction and Mental Health Branch submitted that mental health crisis and suicide prevention services aimed at the general adult population may not be appropriate or culturally safe for some individuals, including Indigenous populations. The CAFN, the CYFN, and the First Nation of Na-Cho Nyak Dun submitted that there was a significant need to ensure that mental health crisis and suicide prevention service provision is culturally sensitive and addresses issues related to language, ease of access, and availability of services. The CAFN and the First Nation of Na-Cho Nyak Dun argued that three-digit access to counselling or support services alone will not address the needs of Indigenous people if those services are hard to understand, unmindful of cultural differences, difficult to access, or unfamiliar with local circumstances.

223. Several parties submitted that there was a significant need to address mental health concerns for Indigenous populations, especially in the territories. The CAFN submitted that the COVID-19 pandemic has brought to light undeniable inequities between Indigenous and non-Indigenous citizens within the health care system, including mental health support. It also submitted that a review of mental health data suggests that having accessible services for local communities specific to mental wellness is a significant need for Yukon, and particularly for Indigenous citizens. The CAFN further submitted that the KUU-US Crisis Line Society's First Nations- and Indigenous-specific crisis line should be available through the three-digit code.<sup>20</sup>

224. Youth for Youth Quebec submitted that 14 communities throughout the region of Nunavik are experiencing a growing suicide epidemic among their Inuit youth. It also submitted that while the more successful initiatives to combat similar epidemics within Indigenous communities have focused primarily on cultural revitalization, a complementary three-digit number is hardly unwelcome, and does not impose any new demands on these communities.

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<sup>20</sup> KUU-US services are available 24 hours a day, 7 days a week, toll-free from anywhere in British Columbia, and all crisis response personnel are certified and trained in Indigenous cultural safety.

225. The CYFN submitted that increased access to mental wellness strategies in Yukon (and indeed the North), such as a three-digit code, would help build strength and resilience in communities by facilitating targeted prevention services for high-risk individuals and families. It also submitted that this type of service would best serve the smaller and more remote Yukon communities, as Internet access is unreliable at times and not always available.

#### **Indigenous DDBHH communities**

226. The DWCC submitted that there needs to be assurance that the services accessed through the three-digit code would be accessible to Indigenous Deaf communities. It indicated that there is a high incidence of addiction and mental health issues in these communities, and that Indigenous Deaf people, living either off- or on-reserve, die by suicide at a higher rate than non-Indigenous people. The DWCC also submitted that there is a lack of mental health support and access to mental health services, especially crisis services, in these Indigenous communities. The DWCC therefore recommended that the Commission assist in removing the barriers that Canada's Indigenous Deaf communities face in accessing mental health crisis and suicide prevention services.

#### **DDBHH Canadians**

227. CAD-ASC, the CDGM, the DHH Coalition, and the DWCC expressed concerns related to the accessibility and availability of mental health crisis and suicide prevention services for DDBHH individuals who use a sign language as their primary language.

228. CAD-ASC indicated that Talk Suicide Canada does not provide accessible communications through sign language, and that it is concerned that mental health crisis and suicide prevention organizations not promoting accessibility to information, services, and communications for DDBHH Canadians will create barriers for those who cannot access these services through VRS or through other accessibility initiatives that use sign languages. The DWCC also submitted that there is no national mental health organization specifically for DDBHH Canadians, and only two dedicated mental health programs for the DDBHH community, which are funded by provincial governments (British Columbia and Ontario).

229. The DHH Coalition highlighted that DDBHH Canadians are at a higher risk of suicide, with Deaf adults having a higher reported rate of diagnosis of depression or anxiety disorder at an earlier onset compared to the general population, and that post-secondary students who are Deaf or hard of hearing are twice as likely to consider or attempt suicide than students without hearing loss. Further, the DWCC submitted that the COVID-19 pandemic has highlighted gaps in mental health support services for DDBHH Canadians, and that there has been an increase in suicide and mental health crises within the community.

230. The CAD-ASC replied that Kids Help Phone offers a 24/7 texting service. Based on Kids Help Phone's data, youth experiencing crisis are nine times more likely to reach

out for help by text or chat than by telephone. CAD-ASC highlighted that the implementation of a three-digit code service available through texting will not only support DDBHH people but other Canadians needing mental health support who may be unwilling or unable to speak over the telephone.

### **Commission's analysis**

231. The Commission considers that, although the delivery or creation of new mental health and suicide prevention services is not within its jurisdiction, the record of this proceeding demonstrates the importance of providing mental health crisis and suicide prevention services that are inclusive and accessible.
232. The Commission considers that Kids Help Phone and Talk Suicide Canada partners are actively engaged in addressing and improving quality of delivery to Canadian equity-denied groups. Measures have been put in place to ensure that counsellors and responders are providing culturally appropriate care that aligns with the specific needs of Indigenous communities and certain groups across Canada.
233. Information on the record of this proceeding from current mental health crisis and suicide prevention service providers also demonstrates that there is an active effort to address the unique needs of Indigenous populations, with consultations and community engagement sessions performed to inform current and future training and service delivery improvement needs. Kids Help Phone, for example, appears to be actively engaged in improving service delivery to support First Nations, Inuit, and Métis young people across Canada via the implementation of the Kids Help Phone action plan<sup>21</sup> under the governance of their Indigenous Advisory Council. In addition to this initiative, the Kids Help Phone website provides a landing page for other Indigenous support and engagement programs to support Indigenous youth.
234. Data shows that numerous Indigenous communities are particularly at risk for elevated suicide rates – for example, the four Inuit regions in Canada report rates that are five to twenty times higher than the national average. The Commission acknowledges the important work that is undertaken and the many initiatives that have been launched in these communities to improve the situation. It considers that a three-digit code providing culturally sensitive access to mental health crisis and suicide prevention services has the potential to support these efforts.
235. The Commission considers that the agencies and organizations involved in delivering these services have demonstrated that they are attuned to the specific needs of equity-denied groups, committed to reconciliation with Indigenous people, and committed to ensuring that their services are appropriately adapted. As such, the Commission is confident that PHAC, in collaboration with its partners, will continue to advocate for and execute measures to address these matters when providing the service that will be accessed by Canadians through the three-digit code.

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<sup>21</sup> See [Finding Hope: Kids Help Phone's Action Plan for Supporting First Nations, Inuit, and Metis Young People](#).

## Conclusion

236. In light of all the above, the Commission **determines** that

- it would be appropriate to introduce a three-digit code for mental health crisis and suicide prevention services;
- 9-8-8 is to be introduced as the three-digit code to provide national access to mental health crisis and suicide prevention services; and
- 1-8XX translation is to be used as the routing method for 9-8-8 calls.

237. The Commission **directs** TSPs to

- transition to ten-digit local dialing by **31 May 2023** (except in NPA 867 outside the Yellowknife LIR, and NPA 506 in New Brunswick);
- implement any other necessary changes required for the implementation of 9-8-8 by the later of **30 November 2023**, or within **six months** after the date on which PHAC files a letter with the Commission, serving TSPs and all parties to the proceeding, stating to which 1-8XX number calls to the three-digit code should be routed, and launch 9-8-8 on that date;
- file their communications plan about the transition to ten-digit local dialing with the Commission, in both official languages, for information purposes, by **30 September 2022**;
- provide communications about this transition in ASL and LSQ, as well as in the languages of the Indigenous communities located in the areas that would be transitioning from seven-digit to ten-digit local dialing as a result of the introduction of 9-8-8; and
- develop and implement the awareness campaign in collaboration with the 9-8-8 operator and raise awareness about 9-8-8 service at the time the 9-8-8 operator considers appropriate to do so.

238. The Commission also **approves** Northwestel's Part 1 application to accommodate both seven- and ten-digit local dialing on a permissive basis in NPA 867 (except in the Yellowknife LIR, where ten-digit local dialing would be mandatory), and **directs** Northwestel to launch 9-8-8 on the same deadline provided for other areas.

239. The Commission further **determines** that each TSP is to assume the costs of transitioning to ten-digit local dialing, basic switch modifications, and network changes necessary for the implementation of 9-8-8. In addition, the Commission imposes a condition of service, under sections 24 and 24.1 of the Act, on the provision of telecommunications services, whereby TSPs will bear the costs of calls to 9-8-8 and will not charge their end-users for accessing this service.

240. With respect to the ability to text directly to 9-8-8, the Commission **directs** WSPs to implement text-to-9-8-8 using a CSC on the same date established by the

Commission to implement 9-8-8 voice call service. The Commission also imposes a condition of service, under sections 24 and 24.1 of the Act, on the provision of mobile wireless services, whereby WSPs will bear the costs of operating text-to-9-8-8 and will not charge their end-users for this service.

241. Finally, the Commission **determines** that

- dispatchable location information is not to be automatically collected during calls to 9-8-8; and
- calls to 9-8-8 from nomadic VoIP service users and VRS calls are to be implemented in the same manner as other calls to 9-8-8.

### **Policy Directions**

242. The 2006 Policy Direction<sup>22</sup> requires that the Commission, in implementing the telecommunications policy objectives set out in section 7 of the Act, rely on market forces to the maximum extent feasible as the means of achieving the policy objectives. Further, when relying on regulation, the Commission should use measures that are efficient and proportionate to their purpose and that interfere with the operation of competitive market forces to the minimum extent necessary to meet the policy objectives.

243. Additionally, the 2019 Policy Direction<sup>23</sup> provides that when the Commission exercises its powers and performs its duties under the Act, it should consider how its decisions can promote competition, affordability, consumer interests, and innovation. Moreover, the Commission should, in its decisions, demonstrate its compliance with the 2019 Policy Direction and should specify how those decisions can, as applicable, promote competition, affordability, consumer interests, and innovation.

244. The Commission considers that its determinations in this decision advance the policy objectives set out in paragraphs 7(a), (b), (f), and (h) of the Act.<sup>24</sup>

245. The Commission is of the view that its determinations regarding the introduction of a three-digit code for mental health crisis and suicide prevention services will give Canadians in all regions of the country easier, accessible, and free-of-charge access

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<sup>22</sup> *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives*, SOR/2006-355, 14 December 2006

<sup>23</sup> *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation*, SOR/2019-227, 17 June 2019

<sup>24</sup> The cited policy objectives are: 7(a) to facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions; 7(b) to render reliable and affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada; 7(f) to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective; and 7(h) to respond to the economic and social requirements of users of telecommunications services.

to these services. The Commission is also of the view that the measures established in this decision will ensure a timely and efficient implementation of the three-digit code. Further, the determinations apply in a competitively neutral manner to all TSPs providing local voice services as well as mobile voice and text services.

246. The Commission therefore considers that, in accordance with subparagraphs 1(a)(ii) and 1(b)(iii) of the 2006 Policy Direction and subparagraphs 1(a)(iii), (iv), and (v) of the 2019 Policy Direction, its determinations in this decision (i) are efficient and proportionate to their purpose and interfere with competitive market forces to the minimum extent necessary to meet the policy objectives noted above; (ii) are implemented in a symmetrical and competitively neutral manner to the greatest extent possible; (iii) ensure that affordable access to high-quality telecommunications services is available in all regions of Canada, including rural areas; and (iv) enhance and protect the rights of consumers in their relationships with TSPs, including rights related to accessibility.

Secretary General

### **Related documents**

- *Establishment of new deadlines for Canada's transition to next-generation 9-1-1*, Telecom Decision CRTC 2021-199, 14 June 2021
- *Call for comments – Introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services*, Telecom Notice of Consultation CRTC 2021-191, 3 June 2021; as amended by Telecom Notice of Consultation CRTC 2021-191-1, 30 November 2021
- *Call for comments – Review of video relay service*, Telecom Notice of Consultation CRTC 2021-102, 11 March 2021, as amended by Telecom Notices of Consultation CRTC 2021-102-1, 26 April 2021; 2021-102-2, 30 June 2021; and 2021-102-3, 14 March 2022
- *Applications for assignment of the 5-1-1 access code*, Telecom Decision CRTC 2006-44, 28 July 2006
- *Allocation of three-digit dialing for public information and referral services*, Decision CRTC 2001-475, 9 August 2001