



Telecom Decision CRTC 2023-226

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Canadian Armed Forces and Canadian Coast Guard – application to designate Maritime Rescue Sub-Centres and Joint Rescue Coordination Centres as secondary public safety answering points

Summary

The Commission **approves** the application from the Canadian Joint Operations Command requesting to designate certain Joint Rescue Coordination Centres, Maritime Rescue Sub-Centres and backup facilities of the Canadian Armed Forces and the Canadian Coast Guard as secondary public safety answering points in order to interconnect with the next-generation 9-1-1 networks.

Background

1. In Telecom Regulatory Policy 2017-182, the Commission established a framework for the implementation and provision of next-generation 9-1-1 (NG9-1-1) and directed all incumbent local exchange carriers to establish their NG9-1-1 networks in their operating territories.¹ These NG9-1-1 networks include connections to primary and secondary public safety answering points (PSAPs). PSAPs fall within the jurisdiction of provincial, territorial, and/or municipal governments.
2. A primary PSAP is a PSAP to which 9-1-1 emergency requests and associated data are routed as the first point of contact with a 9-1-1 telecommunicator. In most cases, the primary PSAP then contacts the appropriate agency to dispatch emergency responders. However, in cases where local authorities determine that specialized expertise is required to handle the 9-1-1 call, such as emergency medical services, 9-1-1 calls are then transferred to a secondary PSAP.
3. A secondary PSAP is a PSAP to which 9-1-1 emergency requests and associated data are transferred from a primary PSAP. Secondary PSAPs dispatch emergency

¹ NG9-1-1 in Canada is based on the National Emergency Number Association (NENA) i3 architecture standard (the NENA i3 standard). The Commission approved the NENA i3 standard as the NG9-1-1 architecture standard in Telecom Decision 2015-531.

responders as required such as police, fire and ambulance. The National Emergency Number Association (NENA) defines a secondary PSAP in a manner consistent with the Commission's definition; in their respective definitions, neither the Commission nor NENA specifies which type of emergency services may be provided by a secondary PSAP.

4. As part of the NG9-1-1 framework established in Telecom Regulatory Policy 2017-182, the Commission determined that entities that connected to previous versions of 9-1-1 (Basic 9-1-1 and Enhanced 9-1-1)² such as mobile wireless carriers, competitive local exchange carriers and PSAPs are considered to be trusted entities and can therefore continue to interconnect with the 9-1-1 networks in the context of NG9-1-1. The Commission also indicated that since NG9-1-1 services are expected to be provided by various entities in the future, it may need to initiate a future review to determine which additional entities should be permitted to interconnect directly with the NG9-1-1 networks, and whether the associated interconnection costs would be recoverable through the NG9-1-1 network access tariffs.³
5. In Canada, the National Search and Rescue program is responsible for aeronautical and maritime search and rescue, with the Canadian Armed Forces (CAF) retaining responsibility for aeronautical incidents and the Canadian Coast Guard (CCG) retaining responsibility for maritime incidents. The CAF and CCG fulfill their federal search and rescue responsibilities through Joint Rescue Coordination Centres and Maritime Rescue Sub-Centres. The Joint Rescue Coordination Centres also coordinate requests from other levels of government for the use of federal search and rescue resources. The National Search and Rescue program manages approximately 9,000 distress cases per year.

Application

6. On 8 July 2022, the Commission received an application from the Canadian Joint Operations Command (CJOC) on behalf of the CAF and CCG requesting to have certain centres designated as secondary PSAPs in order to interconnect with the NG9-1-1 networks. Specifically, CJOC's application pertains to three Joint Rescue Coordination Centres located in Halifax, Nova Scotia, Trenton, Ontario, and Victoria, British Columbia; two Maritime Rescue Sub-Centres located in Quebec City, Quebec, and St. John's, Newfoundland; and the three CJOC backup facilities associated with these centres (collectively referred to as the CAF and CCG centres).

² Basic 9-1-1 service enables callers to connect to 9-1-1 operators, who dispatch the appropriate emergency responders. Enhanced 9-1-1 service includes basic 9-1-1 service but also automatically provides 9-1-1 operators with ancillary information, such as the telephone number and location of the caller.

³ In Telecom Regulatory Policy 2017-182, the Commission noted that in an NG9-1-1 environment, entities other than mobile wireless carriers and competitive local exchange carriers may seek to interconnect directly with the NG9-1-1 networks to send emergency service requests to PSAPs. Examples include entities that provide services such as telematics and social media text messaging applications.

7. CJOC submitted that these centres operate the same way that secondary PSAPs do in terms of roles and responsibilities. Because the centres are not interconnected with the Enhanced 9-1-1 and NG9-1-1 networks, emergency response information is relayed to them verbally by secondary PSAPs. CJOC submitted that if the centres were interconnected with the NG9-1-1 networks as secondary PSAPs, they would automatically receive emergency response information on their systems, increasing the efficiency of their emergency response. Interconnecting with the NG9-1-1 networks would also allow for better communication between the centres, the public, and other PSAPs.
8. CJOC indicated that the CAF and CCG would be prepared to accept all costs and responsibilities associated with NG9-1-1 interconnectivity beyond the demarcation points for all their centres.
9. CJOC submitted that a major obstacle to interconnecting with a previous version of the 9-1-1 networks (for Enhanced 9-1-1) was that the centres under CJOC are federal entities, and the current 9-1-1 agreements between 9-1-1 network providers and 9-1-1 authorities are either with municipal or provincial/territorial governments. Until now, no federal government entity has entered into such agreements with 9-1-1 network providers. Therefore, there is currently no 9-1-1 agreement to model for the interconnection of federal entities to the 9-1-1 networks.
10. The Commission received interventions from: Bell Canada; TELUS Communications Inc. (TCI); Rogers Communications Canada Inc. (RCCI); two PSAPs who responded to a Commission [letter](#) dated 9 November 2022; Barrie Fire and Emergency Service (Barrie Fire); and Centre d'appel d'urgence des régions de l'Est du Québec (CAUREQ).

What are the benefits of interconnecting the CAF and CCG centres with the NG9-1-1 networks, and would it be appropriate to designate these centres as secondary PSAPs or trusted entities?

Positions of parties

11. All of the interveners were of the view that allowing the CAF and CCG centres to interconnect with the NG9-1-1 networks would increase the efficiency of emergency responses. This interconnection would allow for efficient forwarding of calls and effective transfer of relevant information electronically, rather than verbally, between the centres and the relevant primary and secondary PSAPs.
12. With respect to whether the CAF and CCG centres should be designated as secondary PSAPs or trusted entities, interveners expressed different views. Bell Canada and TCI submitted that the centres should be designated as secondary PSAPs. Bell Canada indicated that this would be consistent with the current NG9-1-1 network access tariffs and with the Commission's determinations in Telecom Decision 2018-188, in which the Commission recognized that excluding secondary PSAPs from NG9-1-1 network access tariffs poses a risk to the deployment of NG9-1-1. Bell Canada and

TCI further submitted that the CAF and CCG centres already function in a manner consistent with secondary PSAPs.

13. CAUREQ submitted that designating an organization under federal jurisdiction as a secondary PSAP would not be problematic if that organization is familiar with search and rescue operations. CAUREQ stated that there is already an extensive operational relationship between itself and the CCG for current search and rescue operations; CAUREQ transfers callers to the CCG, participates in the coordination of fire safety services acting in support of the CCG and deploys the ambulance resources necessary for interventions. PSAPs primarily use the public switched telephone network to relay information verbally to the CCG. This cooperation has led to the existing operational agreements that define the interactions between PSAPs and Maritime Rescue Sub-Centres.
14. Barrie Fire and RCCI submitted that the CAF and CCG centres should not be considered as secondary PSAPs, but rather as trusted entities, because they are not provincial or municipal organizations that specifically offer police, fire and ambulance services, as outlined in Telecom Decision 2018-188. Barrie Fire and RCCI also raised concerns about the high technical standards that the CAF and CCG centres must meet in order to interconnect with all the required PSAPs and the NG9-1-1 networks.
15. RCCI further submitted that designating the CAF and CCG centres as secondary PSAPs would entail a lengthy and complex process for NG9-1-1 network providers, who would have to refile their cost studies and related tariffs to accommodate these new secondary PSAPs. If the centres were designated as trusted entities, then the centres would be responsible for all of the costs to connect to the NG9-1-1 networks themselves.
16. TCI requested that the Commission approve changes to the NG9-1-1 network access tariffs to include national entities as 9-1-1 authorities, which would allow those entities to sign 9-1-1 agreements with NG9-1-1 service providers and therefore allow NG9-1-1 service providers to recover costs incurred as a result of interconnecting with the NG9-1-1 networks.
17. Similarly, Bell Canada noted that the costs that NG9-1-1 network providers would incur by providing suitable NG9-1-1 facilities to CJOC were not included in the cost study that it filed in support of its NG9-1-1 network access tariff, and that inclusion of these costs in the tariff would be consistent with the Commission's findings in Telecom Decision 2018-188. However, Bell Canada indicated that it currently does not have sufficient information to determine what those costs would be and would therefore have to work closely with the CAF and CCG centres to determine all the associated costs of service before amending the original tariff filing with the Commission.

Commission's analysis

18. Interconnecting the CAF and CCG centres with the NG9-1-1 networks would allow these centres to receive high-quality information, services and support, which would enable emergency responders to more effectively assist Canadians who require emergency search and rescue assistance. The Commission is of the view that interconnecting these centres with the NG9-1-1 networks would be consistent with the current NG9-1-1 framework.
19. Barrie Fire and RCCI submitted in their interventions that the CAF and CCG centres do not offer fire, ambulance or police services and should therefore not be considered as secondary PSAPs. Both the Commission and NENA have defined a secondary PSAP as a PSAP to which 9-1-1 emergency requests and associated data are transferred from a primary PSAP; emergency response is not limited to specifically fire, emergency medical response or police in either definition. The CAF and CCG centres dispatch search and rescue responders, and the Commission is of the view that this constitutes dispatching emergency responders. The Commission therefore considers that the role of the CAF and CCG centres is already consistent with the role of secondary PSAPs.
20. The ability to automatically access callers' information via the NG9-1-1 networks would be beneficial to the CAF and CCG centres since it would improve their emergency response times. The Commission is therefore of the view that it is in the public interest to designate these centres as secondary PSAPs.
21. The concept of a trusted entity is a new category for interconnecting entities to the NG9-1-1 networks; a trusted entity would have a different role than an originating network provider or a PSAP. For example, a trusted entity could seek to interconnect directly with the NG9-1-1 networks to send emergency service requests to PSAPs or to provide additional information such as telematics. The CAF and CCG centres do not fit in the category of a trusted entity, which provides additional information related to an emergency response; rather, their role is consistent with that of a secondary PSAP, which receives and acts on emergency requests and the data associated with those requests.
22. With respect to concerns raised by Barrie Fire and RCCI about the high technical standards that the CAF and CCG centres must meet in order to interconnect with all the required PSAPs and the NG9-1-1 networks, the Commission considers that the CAF and CCG are aware of this responsibility. CJOC acknowledged in their application that they are prepared to accept the responsibilities associated with interconnection to the NG9-1-1 networks.
23. In Telecom Decision 2019-353, the Commission directed all NG9-1-1 network providers to include certain interconnection conditions in their NG9-1-1 service agreements, and to take reasonable measures to ensure that only PSAPs that are compliant with these conditions are connected to the NG9-1-1 networks. The Commission considers that, as secondary PSAPs, the CAF and CCG centres will need

to comply with all of the requirements that apply to other PSAPs and have all of the appropriate agreements in place. The CAF and CCG centres are therefore subject to all applicable technical, reliability, resiliency and security requirements as defined in the NENA i3 architecture standard, the NG9-1-1 network providers' interconnection specifications, Commission determinations, and NG9-1-1 service agreements. The operational costs incurred by the CAF and CCG centres in their capacity as PSAPs shall continue to be borne by the centres.

24. By designating the CAF and CCG centres as secondary PSAPs, NG9-1-1 network providers can recover costs related to the interconnection of these centres with the NG9-1-1 networks via the NG9-1-1 network access tariffs. NG9-1-1 network providers in the territories in which the centres are located can file revised cost studies to reflect additional costs, as well as revised tariffs to include the centres. The Commission does not consider that refiled cost studies and related tariffs would be a concern for NG9-1-1 network providers, given that the NG9-1-1 network providers themselves have not raised the issue, and that the addition or removal of PSAPs is a common occurrence. Furthermore, interconnection of the CAF and CCG centres is not anticipated to materially impact the overall NG9-1-1 network access tariff rates.
25. The Commission is of the view that it would be more efficient to direct NG9-1-1 network providers to account for any potential NG9-1-1 rate impacting changes resulting from this decision in their subsequent rate submissions prior to the decommissioning of the Basic and Enhanced 9-1-1 networks in 2025 as set out in Telecom Decision 2021-199.

Conclusion

26. In light of all of the above, the Commission **approves** CJOC's application and designates their centres as secondary PSAPs to interconnect to the NG9-1-1 networks.
27. Furthermore, the Commission **directs** NG9-1-1 network providers, should they wish to recover the costs associated with interconnection with these new centres, to file the cost studies with their proposed NG9-1-1 wholesale and retail network access tariffs with sufficient time for the tariffs to take effect on the date by which their existing 9-1-1 networks are to be decommissioned (which is mandated to take place by 4 March 2025).
28. The Commission expects NG9-1-1 network providers and CJOC to work together to interconnect the centres with the NG9-1-1 networks in a timely fashion.

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

- *CISC Emergency Services Working Group – Consensus report on matters related to compatibility, reliability, resiliency, and security for next-generation 9-1-1*, Telecom Decision CRTC 2019-353, 22 October 2019
- *New Brunswick 9-1-1 Bureau, on behalf of public safety answering point organizations – Application to review and vary Telecom Regulatory Policy 2017-182 regarding next-generation 9-1-1 services*, Telecom Decision CRTC 2018-188, 28 May 2018
- *Next-generation 9-1-1 – Modernizing 9-1-1 networks to meet the public safety needs of Canadians*, Telecom Regulatory Policy CRTC 2017-182, 1 June 2017; as amended by Telecom Regulatory Policy CRTC 2017-182-1, 28 January 2019
- *CISC Emergency Services Working Group – Consensus report regarding a Next-Generation 9-1-1 network architecture standard for Canada*, Telecom Decision CRTC 2015-531, 30 November 2015