



Telecom Notice of Consultation CRTC 2025-20

PDF version

Ottawa–Gatineau, 27 January 2025

Public record: [1011-NOC2025-0020](#)

Call for comments – Improving the routing of 9-8-8 calls and texts

Deadline for submission of interventions: 26 February 2025

Deadline for submission of replies: 10 March 2025

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

Summary

9-8-8 provides anyone in Canada with bilingual, trauma-informed, and culturally appropriate support for mental health crisis and suicide prevention. The service is free and is available 24 hours a day, 7 days a week, year-round.

The Public Health Agency of Canada (PHAC) oversees funding and administration of the [9-8-8: Suicide Crisis Helpline](#), and the service is delivered by the Centre for Addiction and Mental Health (CAMH). The Commission is responsible for directing telecommunications service providers to make the necessary network modifications to implement 9-8-8 and any subsequent improvements.

When someone calls or texts 9-8-8, they should be connected to the nearest local response centre. However, PHAC and CAMH have found that it is not the case for some 9-8-8 calls. CAMH has proposed an alternative routing method to help resolve this issue. CAMH has also requested that the Commission help improve 9-8-8 call routing.

In response, the Commission is launching a proceeding to seek comments on how to improve the routing of 9-8-8 calls and texts.

Background

1. 9-8-8 is an important, free service for mental health crisis and suicide prevention available to anyone in Canada that is seeking immediate support. When a person is in a crisis situation, remembering or finding a seven- or ten-digit number can be especially difficult, and can prevent a person from receiving the assistance they may urgently need. For this reason, the abbreviated dialing (three-digit) code 9-8-8 was introduced to help increase access to crisis management services.

2. Calls placed to 9-8-8 are routed to a toll-free 1-8XX number using the caller's area code (i.e., the first three digits of the caller's phone number). This means that once a call is received by the 1-8XX number in the 9-8-8 system, it will be routed to the crisis centre that is closest in location to the caller's area code, and not where the caller is actually located. In addition, calls made from a caller who has blocked their number are routed to the national crisis centre in the absence of area code information.
3. When 9-8-8 was introduced in Canada in Telecom Regulatory Policy [2022-234](#) (the Policy), the Commission established the following call routing requirements:
 - Telecommunications service providers (TSPs) must use 1-8XX routing for 9-8-8 calls. This was considered to be the most efficient and cost-effective routing for 9-8-8 calls at the time the Policy was issued.
 - 9-8-8 calls are not to be interconnected with 9-1-1 networks for various reasons, including those related to the privacy of the caller and the potential impacts it may have on the introduction of next generation 9-1-1.
 - Dispatchable location information, which identifies the exact location of the caller, is not to be automatically collected during calls to 9-8-8, because doing so may deter callers who wish to remain anonymous when accessing the service.
 - Calls from nomadic voice over Internet Protocol (VoIP) service users and calls using video relay service (VRS)¹ must be implemented in the same way as all 9-8-8 calls.
4. Since the launch of 9-8-8, the Public Health Agency of Canada (PHAC) and the Centre for Addiction and Mental Health (CAMH) have identified concerns with the current routing method. Specifically, they noted that the current routing method uses the caller's phone number area code to determine which of nearly 40 response centres should receive the call.²
5. Since Canadians can keep their phone number when they move or change service providers,³ the phone number of a caller does not necessarily correspond to the area where the caller is physically located. For example, when a caller in Vancouver dials 9-8-8 from a phone number with a 416 area code (which corresponds to Toronto), they will be connected to a response centre in Toronto rather than Vancouver.

¹ VRS enables people who use sign language to conduct telephone calls and communicate with voice telephone users using sign language.

² The numbering plan area, often referred to as the area code, refers to the first three digits of a ten-digit phone number and is geographically assigned based on the corresponding numbering plan area.

³ This is possible under the Commission's [number portability rules](#).

6. This can negatively impact response centres' ability to connect callers with local emergency services and resources. The services and resources that a centre provides may also be unique to its local communities, and a local centre is more aware of the needs of the communities it serves.
7. CAMH proposed a routing method using local Direct Inward Dialing (DID) numbers⁴ to route calls based on where they enter the network. They indicated that this approach could more accurately route calls while also improving the resiliency of the 9-8-8 network, since the assignment of multiple DIDs would reduce the likelihood of nation-wide outages. Details of CAMH's proposal are available in CAMH's document on the [record of this proceeding](#).

Call for comments

8. The Commission is launching this proceeding to gather comments on how to help improve the routing of 9-8-8 calls and texts.
9. The following issues are to be addressed in this notice:
 - CAMH's proposal
 - Potential alternative solutions
 - Implementation timelines
 - Costs of implementation
 - Privacy implications for end-users
 - Technical considerations
10. The Commission invites comments on the above issues, including responses to specific questions in the Appendix to this notice.
11. The Commission does not have jurisdiction over mental health crisis and suicide prevention organizations. Therefore, matters pertaining to the governance, coordination, and funding of mental health crisis and suicide prevention services are beyond the scope of this proceeding.

CAMH's proposal

12. CAMH proposed using local DIDs to route calls based on network entry points, and using location routing numbers (LRNs)⁵ to route calls to the nearest response centre instead of a response centre associated with the caller's area code. Additionally,

⁴ DID numbers are phone numbers that allow customized and systematic call routing.

⁵ An LRN is a 10-digit number used to uniquely identify a switch. Under CAMH's proposed solution, calls would be routed based on the LRN of the carrier's switch receiving the incoming call.

CAMH indicated that this method would allow for improved routing when someone decides to place a call from a blocked number.

13. CAMH indicated that its proposal would only impact back-end network infrastructure and would not alter what the caller experiences when contacting 9-8-8. CAMH does not expect its proposal to infringe on the privacy of the caller, since it would not automatically capture dispatchable location information. In addition, CAMH indicated that this routing method would allow blocked telephone numbers to remain anonymous. For more information on the privacy impact assessment of CAMH's proposal, please refer to CAMH's document on the [record of this proceeding](#).
14. CAMH indicated that its proposed solution has the added benefit of improving the resiliency of the 9-8-8 network. A single underlying 1-8XX number operated by a single provider is more susceptible to widespread network outages due to a lack of redundancies. With local DIDs, any local outage could be remedied by routing calls to in-service DIDs at neighbouring response centres.
15. Should CAMH's proposal be approved by the Commission, CAMH would work with carriers to assess the number of DIDs needed for full geographic coverage and a robust routing plan across Canada.
16. The Commission invites comments on the introduction of local DIDs for 9-8-8 routing.

Potential alternative solutions

17. The Commission is also considering other routing methods that could improve the routing of 9-8-8 calls and texts. For example, the U.S. Federal Communications Commission has [required](#) wireless carriers to implement geo-routing⁶ for calls placed to 9-8-8 and will be exploring geo-routing for text messages to 9-8-8 in the U.S.
18. TSPs and interested persons are invited to share their views on whether there are alternative routing methods that could improve 9-8-8 routing.
19. The Commission welcomes proposals for alternative solutions to help improve routing for 9-8-8 calls. Any alternative solutions should outline advantages and challenges compared to CAMH's proposal.

Implementation timelines

20. In the Policy, the Commission determined that 9-8-8 would be rolled out across Canada on the same date. This approach ensured the service was accessible in all provinces and territories at the same time.

⁶ [Geo-routing](#) is a broad term for technical solutions that route calls based on the geographic location where the call is placed.

21. To ensure service continuity, CAMH's proposed solution would keep the existing 1-8XX number operational while DIDs are introduced and begin routing 9-8-8 calls to designated local numbers. A phased-in rollout could make more localized services available sooner as network modifications are completed.
22. CAMH proposed an implementation period of six to eight months to ease the transition for carriers.
23. The Commission invites comments on feasible timelines and approaches for implementing routing improvements.

Costs of implementation

24. In the Policy, the Commission noted that network upgrade costs for introducing 9-8-8 would not be significant and determined that TSPs would be responsible for bearing these costs. The Commission had also directed TSPs not to charge callers for accessing 9-8-8 because doing so would likely deter uptake of the service. CAMH suggested its proposal would result in cost savings to 9-8-8 service delivery, however, it was unclear what the costs would be for TSPs to implement the solution.
25. The Commission invites comments on the costs associated with the implementation of CAMH's proposal, and any other alternative solution proposed.
26. The Commission is of the preliminary view that TSPs would be responsible for any costs associated with network modifications to introduce a different routing method and invites comments on this view.

Privacy implications for end-users

27. The record on consumer privacy and confidentiality was well-developed in the proceeding that led to the Policy. Parties raised privacy concerns related to the automatic capture of users' location information for calls placed to 9-8-8.
28. The Commission is focussed on protecting the anonymity of 9-8-8 users and maintaining the privacy determinations in the Policy. Any determinations made with respect to 9-8-8 routing should not deter callers who wish to remain anonymous from accessing the service.
29. The Commission invites comments on whether CAMH's proposal and any alternative proposal raise privacy considerations. CAMH indicated that its proposal would not access or use geo-data, except if deemed appropriate by the responder to connect a caller with emergency services. Response centres would be able to see the region from which the call is placed, but not the exact location of the caller.
30. CAMH included a privacy impact assessment as part of its proposal, which can be found on the [record of this proceeding](#). If alternative solutions are proposed, they must include a privacy impact assessment to ensure that privacy risks have been identified and addressed.

Technical considerations

31. In the Policy, the Commission determined that calls to 9-8-8 via VoIP and VRS should be routed in the same manner as other calls placed to 9-8-8.
32. Any proposed routing methods should take into consideration other technologies used to access 9-8-8, such as VRS. At minimum, any proposed routing method should provide the same level of service currently experienced by callers who use VRS to access 9-8-8.
33. CAMH indicated that its proposal would not impact the existing text service, or how VoIP and VRS calls flow to 9-8-8.
34. The Commission invites comments on the implications of routing calls through different technologies, with specific consideration towards VoIP and VRS calls.
35. In addition, the Commission invites the Canadian Administrator of VRS to comment on what technical considerations should be made with respect to CAMH's proposed solution and any other alternative solutions proposed for callers who use VRS to access 9-8-8.

What you need to know to participate in this proceeding

Procedure

36. The *Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure* (the Rules of Procedure) apply to this proceeding. The Guidelines on the CRTC Rules of Practice and Procedure (Broadcasting and Telecom Information Bulletin 2010-959) are meant to help members of the public understand the Rules of Procedure so that they can more effectively participate in Commission proceedings.

Submitting an intervention

37. The Commission invites comments that address the issues set out above and the questions set out in the Appendix to this notice. The Commission will accept comments that it receives no later than **26 February 2025**.
38. Interested persons who require assistance submitting comments can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca.
39. CAMH and the Canadian Administrator of VRS are made parties to this proceeding and may file interventions with the Commission no later than **26 February 2025**.
40. Interested persons who file an intervention automatically become a party to this proceeding. Only parties to the proceeding can participate in further stages of the proceeding.

41. Submissions must be filed by sending them to the Secretary General of the Commission using only one of the following means:
- Completing the Commission's intervention form
 - Sending a fax to 819-994-0218
 - Writing by mail to CRTC, Ottawa–Gatineau, Ontario K1A 0N2
42. Submissions longer than five pages should include a summary. Submissions will be posted in the official language and format in which they are received.
43. The deadline to submit an intervention to the Commission is 5 p.m. Vancouver time (8 p.m. Ottawa–Gatineau time). Parties are responsible for ensuring the timely delivery of their submissions and will not be notified if their submissions are received after the deadline. Late submissions will not be considered by the Commission and will not be made part of the public record.

Submitting a reply

44. Parties can file replies with the Commission no later than **10 March 2025**. Their replies can address any matters on the record of the proceeding.

Privacy notice

45. Please note the following:
- Documents will be posted on the Commission's website exactly as received. This includes any personal information contained in them, such as full names, emails, addresses, postal/street addresses, and telephone and fax numbers.
 - All personal information parties provide as part of this public proceeding, except information designated as confidential, will be posted on the Commission's website and can be accessed by others.
 - However, the information parties provide can only be accessed from the web page of this particular proceeding. As a result, a general search of the Commission's website using either its search engine or a third-party search engine will not provide access to the information that was provided as part of this public proceeding.
 - The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission or for a use consistent with that purpose.

Confidentiality

46. The Commission's proceedings are designed to allow members of the public to provide input so that it can make better, more informed decisions. As a result, the general rule is that all information filed with the Commission is placed on the public record and can be reviewed by all parties and members of the public.
47. However, the Commission also often needs detailed information from the companies it regulates and supervises to make an informed decision. This information can be commercially sensitive, especially as the environment in which the companies operate becomes more competitive. The Commission will therefore accept certain information as confidential.
48. Parties can request that information be filed in confidence under subsection 39(1) of the *Telecommunications Act* with a detailed rationale as to why that information should be considered confidential. The Commission reminds parties that make such a request that when a document is filed with confidential information, an abridged version must also be filed so that it can be included in the public record.

Accessible formats for people with disabilities

49. The Commission requires regulated entities and encourages all parties to file submissions in accessible formats (for example, text-based file formats that enable text to be enlarged or modified or read by screen readers) for this proceeding. To help in this regard, the Commission has posted on its website [guidelines](#) for preparing documents in accessible formats.
50. If submitted documents have not been filed in accessible formats, you can contact the Commission's Hearings & Public Proceedings group at hearing@crtc.gc.ca to request that Commission staff obtain those documents in accessible formats from the party that originally submitted the documents in question.

Accessing documents

51. Links to interventions, as well as other documents referred to in this notice, are available on the Commission's "[Consultations and hearings: have your say](#)" page.
52. Documents are available upon request during normal business hours by contacting:

Documentation Centre
Examinationroom@crtc.gc.ca
Tel.: 819-997-4389
Fax: 819-994-0218

Client Services

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

53. Interested persons can find electronic versions of the documents by clicking on “[[Submit an intervention or view related documents](#)]” at the top of this notice.

Secretary General

Related documents

- *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*, Telecom Regulatory Policy CRTC 2022-234, 31 August 2022; as amended by Telecom Regulatory Policy CRTC 2022-234-1, 9 December 2022
- *Filing submissions for Commission proceedings in accessible formats*, Broadcasting and Telecom Information Bulletin CRTC 2015-242, 8 June 2015
- *Filing of joint supporting interventions*, Telecom Information Bulletin CRTC 2011-693, 8 November 2011
- *Guidelines on the CRTC Rules of Practice and Procedure*, Broadcasting and Telecom Information Bulletin CRTC 2010-959, 23 December 2010

Appendix to Telecom Notice of Consultation CRTC 2025-20

The Centre for Addiction and Mental Health's (CAMH) proposal

Q1. Would the introduction of local Direct Inward Dialing numbers (DIDs) as per CAMH's proposal provide a better routing method for 9-8-8?

- (a) Identify the flow of caller data, including what information is passed along, who it is retained by, and for how long.
- (b) Provide end-to-end call flow, identifying the different points in the call path, with supporting diagrams, if necessary. Include the following calling scenarios:
 - (i) Call made from a landline with a phone number local to the caller's location
 - (ii) Call made from a landline with a phone number not local to the caller's location
 - (iii) Call made from a landline or a mobile phone with the number blocked
 - (iv) Call made from a mobile phone with a phone number local to the caller's location
 - (v) Call made from a mobile phone with a phone number not local to the caller's location
- (c) How would calls made from non-Canadian (international roaming) numbers be treated?
- (d) Comment on the privacy impacts of CAMH's proposal.

Q2. Based on CAMH's proposed timeline of six to eight months for implementation, comment on the following:

- (a) Is it feasible to implement CAMH's proposal within the timeline?
- (b) What would be the cost for carriers to test and implement the routing under this timeline?
- (c) Are there any foreseen challenges or barriers to implementation within the proposed timeline?

Q3. Identify how effective CAMH's proposed solution may be for different technologies used to access 9-8-8, such as landline or wireless calls, texts, nomadic or fixed Voice over Internet Protocol (VoIP) and video relay service (VRS).

Q4. What network modifications would be required to implement CAMH's proposal?

- (a) Identify the costs associated with performing such modifications.
- (b) Identify the amount of time required to complete these modifications.
- (c) Are there any foreseen challenges or barriers for implementation?

Alternative Solutions

Q5. Interested persons are invited to share alternative solution(s) that could improve the way that calls and texts are routed to 9-8-8. Submissions detailing any alternative solution(s) should address the following:

- (a) How would calls be located and routed to response centres under the alternative solution(s), including calls from a blocked number?
 - (i) Identify the flow of caller data, including what information is passed along, who it is retained by, and for how long.
- (b) Provide end-to-end call flow, identifying the different points in the call path, with supporting diagrams, if necessary. Include the following calling scenarios:
 - (i) Call made from a landline with a phone number local to the caller's location
 - (ii) Call made from a landline with a phone number not local to the caller's location
 - (iii) Call made from a landline or a mobile phone with the number blocked
 - (iv) Call made from a mobile phone with a phone number local to the caller's location
 - (v) Call made from a mobile phone with a phone number not local to the caller's location
- (c) How would calls made from non-Canadian (international roaming) numbers be treated?
- (d) Would the alternative solution(s) improve the resiliency of the existing 9-8-8 network?
- (e) What are the advantages and challenges associated with the alternative solution(s)? Compare the solution(s) to any advantages and challenges foreseen within CAMH's proposal.

- (f) Submit an assessment of privacy impacts that the alternative solution(s) present.
- Q6. What network modifications would be required to implement the alternative solution(s)?
- (a) Identify the costs associated with performing such modifications.
 - (b) Identify the amount of time required to complete these modifications.
 - (c) Are there any foreseen challenges or barriers for implementation?
- Q7. Identify how effective this proposal may be for different technologies used to access 9-8-8, such as landline or wireless calls, texts, nomadic or fixed VoIP and VRS.

CAMH's Proposal and Alternative Solutions

- Q8. Should any routing methods being considered be deployed everywhere in Canada at the same time, or should they be subject to a phased approach? Explain why.
- Q9. Are there any other matters beyond those listed above that the Commission should consider with respect to 9-8-8 routing?