1. The Canadian Independent Telephone Company Joint Task Force ("the JTF") has obtained copies of comments from Bell Aliant Regional Communications, Limited Partnership, Bell Canada and Télébec, Société en Commandite (collectively "Bell Canada"), Cogeco Cable Inc., Rogers Communications Inc., Shaw Communications Inc. and Quebecor Media Inc. (collectively "the cable companies"), the City of Calgary, the Canadian Cable Systems Alliance, Comwave Inc., Bragg Communications Inc., operating as Eastlink, the Coalition of Internet Service Providers inc., Comwave Inc., Execulink Telecom Inc., MTS Allstream Inc., Primus Telecommunications Canada Inc., TELUS Communications Company and the VON Coalition. Pursuant to the procedures established by the Commission in Call for comments – Nomadic VoIP E9-1-1 Service, Telecom Notice of Consultation 2009-194, the JTF hereby submits its reply comments.

2. Silence by the JTF regarding any argument raised or position taken by parties in this proceeding should not be construed as acceptance of, or agreement with those arguments or positions where such acceptance or agreement is not in the interests of the JTF.

3. At paragraph 36 of their comments the cable companies state that:
Secondly, the Cable Carriers submit that a small re-architecting of DSL service in regard to IP Address assignment to accommodate the IP Address Tracker solution would be much more economical than deployment of the proposed Canadian i2 Architecture. (emphasis added)

4. The JTF has no comment on the comparative costs of implementing the IP Address Tracker solution or the proposed Canada i2 Architecture. That being said it does object to the cable companies’ assertion that only “a small re-architecting of DSL service” would be required to implement the IP Address Tracker. This is simply not the case. The JTF notes that in its comments, Bell Canada states the following regarding the cable companies’ proposal:

   Second, it is predicated on architecture and assumptions only applicable to cable networks that are not possible in a DSL environment.¹

5. Bell Canada’s view buttresses the position taken by the JTF in paragraphs 18 and 19 of its 6 November 2009 submission that the provisioning practices of DSL providers and the cable companies differ significantly. Cable companies assign IP addresses to specific equipment (a node for instance) but that is not how most providers manage IP addressing. IP addresses are assigned to the session at the time of authentification. Thus, IP addresses are not assigned to specific equipment or geographic locations. The Commission should make no mistake on this critical point. Changing the architecture from the current process where IP addresses are assigned at the time of authentication to IP addresses being tied to specific equipment is not a matter of a minor reconfiguration or simply changing IP address assignment methodologies.

6. In fact, new provisioning and inventory control processes as well as development of entirely new provisioning applications involving extensive IT development and implementation would be required to facilitate the proposal of the cable companies.

¹ Paragraph 44.
Many of the ASPs represented by the JTF have very small, or in some cases no, in-house IT resources acquainted with application development let alone for activity as discrete as IP address or alternate address tracking. The resource undertaking both from a human resource and cost perspective to facilitate application development would be cumbersome if not financially unsustainable for even the largest of JTF companies.

7. Indeed, such re-architecting is a very major and expensive change that will seriously compromise the viability of smaller ASPs including those represented by the JTF.

8. As a result, the JTF reiterates its position that both the Canadian i2 model and the alternate solutions proposed in this proceeding should be abandoned in favour of the current method of routing 9-1-1 calls made by nomadic VoIP users. The current VoIP 9-1-1 regime provides users with Basic 9-1-1 service, appropriately places the liability on the VoIP service providers and imposes the responsibility on the end-customer to notify the service provider if the customer changes location either permanently or temporarily.

Signed (on behalf of the companies represented by the Canadian Independent Telephone Company Joint Task Force),

Jonathan L. Holmes
Executive Director, OTA
Tel: 519.595.3975
jonathan.holmes@ota.on.ca

c.c. TNC 09-194 Interested Parties

*** End of Document ***