



November 1, 2013

John Traversy
Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Québec J8X 4B1

Dear Mr. Traversy,

Re: CWTA reply to CRTC's January 14, 2013 letter re: mobile device theft reporting requirements

1. The Canadian Wireless Telecommunications Association (CWTA) is the recognized authority on wireless issues, developments and trends in Canada. It represents cellular, PCS, messaging, mobile radio, fixed wireless and mobile satellite carriers as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators and business-to-business service providers.
2. As the Commission is aware, the wireless industry has been making significant investments for more than a year to reduce incidences and the impact of mobile device theft in Canada. These efforts culminated with the September 30, 2013 launch of a national blacklist of wireless devices that have been reported as lost or stolen. CWTA appreciates the Commission's support throughout this process and we will continue to ensure that this program helps to protect Canadian consumers.
3. The Commission, in a letter dated January 14, 2013, requested CWTA provide an update on the following items:
 - The formation of a national blacklist for wireless devices reported lost or stolen;
 - CWTA's public education campaign to promote consumer awareness of the need to keep personal information on wireless devices safe and secure; and
 - The number of wireless devices reported as lost or stolen in Canada in the last 12 months.
4. CWTA is pleased to address these items below.

National Blacklist

5. As the Commission is aware, on September 30, 2013, CWTA announced the formation and launch of a national blacklist of wireless devices that have been reported as lost or stolen. CWTA is pleased to report that all of its

carrier members are sharing the IMEI (International Mobile Equipment Identity) numbers of devices reported to them as lost or stolen through the GSMA IMEI Database, and interrogating subscribers' IMEI numbers against the national blacklist.

6. Going forward, the authorization of any GSM, HSPA, HSPA+ or LTE wireless device on any participating Canadian carrier's network will include verification that the IMEI number of the device has not been reported as lost or stolen on that network or any other participating Canadian network. CWTA carrier members are also downloading the IMEI numbers of devices reported as lost or stolen to US carriers that also use the GSMA IMEI database. The effect of the database is that smartphones and tablets on the blacklist have reduced functionality and therefore reduced value.
7. Meeting the self-imposed September 30, 2013 deadline for launch was the result of great effort and significant investment (in excess of \$20 million) by CWTA's carrier members. These members remain dedicated to administering this initiative in their efforts to combat mobile device theft.
8. Finally, the launch of the blacklist was well received by law enforcement and regulators alike. In fact, the Canadian Association of Chiefs of Police has provided a letter of support for our initiative that is appended to this letter. CWTA appreciates the direct support from CACP, as well as the support it received from the Commission on September 30.

Public IMEI Lookup Tool

9. To help Canadian consumers from unknowingly purchasing previously-owned devices that have been reported as lost or stolen, CWTA's ProtectYourData.ca Web site now features a convenient tool that allows Canadian consumers to simply enter the IMEI number of a wireless device to find out immediately if that device has been blacklisted in Canada. The consumer look-up tool is the first of its kind in the world utilizing the GSMA IMEI database, and has already become popular with Canadian wireless customers. As of October 31, 2013, the tool had processed more than 24,000 consumer queries. By empowering consumers to guard against buying blacklisted devices, the public lookup tool will further reduce the criminal incentive to steal smartphones and tablets.
10. The simultaneous launch of the consumer look-up tool and the national blacklist has greatly increased awareness of the issue of device theft, and highlighted the role of other industries and organizations to help reduce the market for stolen mobile devices. Since September 30, CWTA has fielded calls from numerous private businesses and law enforcement agencies asking how they can identify – and ensure they do not buy or sell – devices that have been reported as lost or stolen. While the CWTA consumer look-up tool is restricted to consumer use only, CWTA has directed these interested parties to GSMA through which they can contract access to the IMEI Database directly to verify the status of mobile devices.

Public Education Campaign

11. CWTA's device theft public education campaign is now nearly a year old. Our efforts continue to include a consumer information Web site and a series of broadcast PSAs focused on reminding Canadians of the critical importance of protecting the data on their smartphones. The bilingual Web site – www.ProtectYourData.ca (www.Protegezvosdonnees.ca) – remains a hub of resources for Canadians to educate themselves about how to secure their data, as well as how to help protect themselves from becoming a victim of device theft. Since its launch, ProtectYourData.ca has received more than 118,000 visits.
12. CWTA also received overwhelming cooperation and commitments from Canadian BDUs and broadcasters in connection to its PSAs. The first device theft PSA aired on Canadian television from November 2012 until it was replaced by our new PSA in June 2013. CWTA greatly appreciates the support from Canada's broadcast community, which has aired our two PSAs, combined, more than 30,000 times over the last 12 months.
13. CWTA has also been joined in its public efforts by other agencies committed to educating the public on mobile device theft. Specifically:
 - On September 19, 2013, the Montreal, Laval and Longueuil police forces jointly launched Projet Sans fil, which reminds citizens to monitor their devices in public places: <http://www.spvm.qc.ca/fr/pdq42/projet-sans-fil.asp>; and
 - On October 17, 2013, the Vancouver Police Department launched its own campaign titled: *If you don't watch your phone, thieves will*. The campaign includes two videos and two posters that encourage citizens to "treat your phone like cash." (<http://mediareleases.vpd.ca/2013/10/16/police-bring-awareness-to-mobile-device-theft/>). It also provides background information on CWTA's mobile device theft initiatives, including the national blacklist and the ProtectYourData.ca Web site.
14. CWTA welcomes the efforts of the Montreal, Laval, Longueuil and Vancouver Police Departments, and encourages more agencies across Canada to join us in increasing awareness of the risks associated with mobile device theft.

Statistics

15. CWTA has streamlined its data collection efforts with respect to mobile devices reported as lost or stolen to now identify devices reported lost and stolen by each individual province – based on the area code of the phone number associated with the device reported as lost or stolen.
16. Not all service providers record lost and stolen devices separately. Those that do record lost and stolen devices separately do so based on the customer's report only. The breakouts provided below are based on applying the provincial percentages of phones reported lost or stolen to the total lost/stolen numbers provided by those who do not distinguish between the two. Because of the significant number of service

providers that do differentiate between lost and stolen devices based on customer reports, the numbers below should be considered statistically significant.

17. The table below provides a breakdown of phones reported as lost and stolen (by province/region) to CWTA members in 2010, 2011, 2012 and 2013 (up to September 30, 2013). CWTA will continue to provide this data to the Commission on an annual basis.

Region/Province		2013	2012	2011	2010
British Columbia	Lost	45,884	53,516	51,281	60,980
	Stolen	12,724	13,090	14,007	16,931
	Total Lost & Stolen	58,608	66,606	65,288	77,911
Alberta	Lost	46,216	51,201	48,512	54,856
	Stolen	10,804	11,890	12,008	14,308
	Total Lost & Stolen	57,020	63,091	60,520	69,164
Saskatchewan	Lost	10,693			
	Stolen	2,875			
	Total Lost & Stolen	13,568			
Manitoba	Lost	11,867			
	Stolen	2,905			
	Total Lost & Stolen	14,771			
Saskatchewan/ Manitoba	Lost		21,593	18,779	17,351
	Stolen		5,837	5,756	4,832
	Total Lost & Stolen		27,430	24,535	22,183
Ontario	Lost	147,122	153,422	148,453	171,674
	Stolen	38,194	40,366	43,201	46,773
	Total Lost & Stolen	185,316	193,788	191,654	218,447
Quebec	Lost	53,183	42,655	57,206	70,555
	Stolen	12,638	11,396	15,368	14,359
	Total Lost & Stolen	65,821	54,051	72,574	84,914
New Brunswick	Lost	4,643			
	Stolen	1,175			
	Total Lost & Stolen	5,818			
Nova Scotia	Lost	7,322			
	Stolen	1,699			
	Total Lost & Stolen	9,020			
Prince Edward Island	Lost	993			
	Stolen	227			
	Total Lost & Stolen	1,220			
Newfoundland and Labrador	Lost	2,600			
	Stolen	2,092			
	Total Lost & Stolen	4,692			
Atlantic Canada	Lost		14,802	13,973	18,558
	Stolen		3,704	4,201	5,084
	Total Lost & Stolen		18,506	18,174	23,642

North	Lost	1,607	529		
	Stolen	409	133		
	Total Lost & Stolen	2,016	662		
Canada	Lost	332,130	337,718	325,626	393,978
	Stolen	85,740	86,416	94,542	102,288
	Total Lost & Stolen	417,870	424,134	420,167	496,266

Conclusion

18. CWTA and its members have always taken the security of all aspects of the Canadian wireless system very seriously. We believe our actions over the past year and a half, and going forward, demonstrate our commitment to doing whatever we can to mitigate the impact, and hopefully the frequency, of handset lost and theft in Canada.

Appendix: Canadian Association of Chiefs of Police letter of support (attached).

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Canadian Association of Chiefs of Police *Leading Progressive change in policing*
Association canadienne des chefs de police *À l'avant-garde du progrès policier*

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Compassion • Courage • Équité • Intégrité • Ouverture • Respect • Transparence • Fiabilité

October 23, 2013

Mr. Bernard Lord
President and CEO,
Canadian Wireless Telecommunications Association
300 - 80 Elgin Street, Ottawa, ON K1P 6R2

Dear Bernard,

The Canadian Association of Chiefs of Police (CACP) is very pleased with the response by the Canadian Wireless Telecommunications Association (CWTA) in launching initiatives targeted towards smartphone theft. Through your actions, we believe these measures will have a significant impact on what the CACP had identified as a rapidly growing problem witnessed by law enforcement services throughout Canada.

As I have previously stated, this is a crime that was too simple. A stolen smartphone could be reactivated on another wireless carrier's network - no questions asked. With these actions that stops, reducing the interest in committing these crimes. The creation of a 'Stolen Smartphone Database' by Canadian wireless carriers; the ability to verify against international countries who also subscribe to the GSMA databases; and education through the www.ProtectYourData.ca website and Public Service Announcements demonstrates a very positive response by the industry.

We certainly appreciate your efforts in listening to the concerns of law enforcement, escalating this issue and coordinating a response that will benefit consumers and the public at large.

Yours sincerely,

Chief Jim Chu
President,
Canadian Association of Chiefs of Police

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