



May 20, 2016

Danielle May-Cuconato
Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Quebec J8X 4B1

Dear Ms. May-Cuconato,

Re: CWTA Comments, Telecom Notice of Consultation CRTC 2016-116 *Establishment of a regulatory framework for next-generation 9-1-1 in Canada*

1. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents wireless service providers 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. CWTA is pleased to file its comments with respect to the above-noted consultation.
2. Of all the social and economic benefits enabled by Canada's world-leading wireless networks, public safety and the security of Canadians is the most important. The reach of wireless networks alone has vastly extended Canadians' ability to contact emergency services. Now, with more than 70% of 9-1-1 calls coming from wireless devices,¹ the reliability and accuracy of wireless services are that much more important. CWTA and its members take this responsibility very seriously.
3. Indeed, every time the wireless industry has been tasked with upgrading 9-1-1 capabilities, it has made all of the necessary investments to provide the new functionality on time. Going forward, wireless industry action will continue to be crucial; many of the possible NG9-1-1 services identified by the Commission will leverage wireless infrastructure.
4. Such past efforts and future opportunities to increase public safety uniquely position CWTA and the wireless industry to comment on the future of 9-1-1 service in Canada and the principles that should be enshrined in the regulatory framework. Specifically, next generation 9-1-1 services must be forward-looking and responsive to consumer preferences, fully tested, and remain the shared responsibility of telecommunications service providers and public safety agencies.

¹ Timothy Denton, *A Report on Matters Related to Emergency 9-1-1 Services*, July 5, 2013.

The wireless industry is a leader in enhancing emergency 9-1-1 services

5. The anywhere/anytime capabilities of wireless devices have greatly expanded Canadians' ability to contact first responders. The wireless industry has taken steps to further enhance the quality and accessibility wireless 9-1-1 calls. For instance, while 9-1-1 call takers once received only the cellular phone number and the location of the nearest cell site or cell tower when a call was placed to 9-1-1 from a cell phone, call takers now receive more precise information based on the longitude and latitude coordinates of where the handset is located. Location information has become additionally accurate through recent requirements adopted by the industry in cooperation with the Commission.
6. More recently, wireless service providers completed the network upgrades required to implement the Text with 9-1-1 (T9-1-1) service for the deaf, deafened, hard of hearing or speech impaired community in Canada. Since that level of readiness was achieved in January 2014, T9-1-1 service has been rolled out by Public Safety Answering Points (PSAPs) to hundreds of communities across Canada. CWTA has also directly assumed responsibility for familiarizing the public with T9-1-1 services through our dedicated website TextWith911.ca.
7. The wireless industry has also always been a willing partner with provinces that have elected to introduce 9-1-1 levies on wireless subscribers to fund the costs of modern 9-1-1 services. Presently, Canada's wireless service providers collect 9-1-1 fees from their subscribers on behalf of the Saskatchewan, New Brunswick, Newfoundland and Labrador, Nova Scotia, Québec, Alberta and Prince Edward Island governments. British Columbia is in the process of consulting municipalities on the form and structure of a province-wide fee in that province, a process in which CWTA has actively participated.

Next Generation 9-1-1 services must be forward-looking and responsive to consumer preferences

8. Wireless service innovation has and will continue to allow for enhancements to 9-1-1 and associated public safety services for the benefit of all Canadians. However, identifying potential NG9-1-1 options to mandate through a regulatory framework must account for the rapid pace of change in the wireless industry and necessary implementation timelines of both wireless service providers and PSAPs. Grounding decisions on likely service provider and PSAP readiness will help ensure the enhancements will be available for, and used, by a majority of citizens at the time they launch. Mandated services that are not significantly forward-looking could end up being less relevant when they are finally introduced, or shortly thereafter, creating an unnecessary expense for service providers and the public safety agencies.
9. As one example, increasing use of internet-based messaging applications instead of SMS messaging will need to be accounted for when considering any additional options for texting with 9-1-1 call takers. Extensive consideration should also be given to consumer preferences and potential future trends for using mobile video, photo, social networking and other data services before integrating any with 9-1-1 service. While it will always be difficult to predict exactly how consumers will be using wireless devices even a couple of years in the future, all steps should be taken to ensure new 9-1-1 service options are relevant to wireless subscribers at the time they are launched and after.

New 9-1-1 services need to be exhaustively tested

10. The regulatory framework for NG9-1-1 services must allow time for all 9-1-1 enhancements to be exhaustively tested, with a particular focus on usability testing. While new 9-1-1 services are always tested extensively in

terms of functionality, CWTA submits that additional user interface testing and fine-tuning are just as important. It is difficult to alter an industry-wide service once it has been launched, and a service with poor usability will likely be underutilized.

11. Extensive usability testing can also help public safety agencies make investment decisions as they will be more certain that a new service will be adopted by consumers. This certainty can make investment decisions for public safety agencies easier, and may ultimately result in broader service availability when launched, instead of a province-by-province or region-by-region rollout as public service agencies invest in necessary upgrades.

NG9-1-1 services must remain the shared responsibility of telecommunications service providers and public safety agencies

12. Enhancements to 9-1-1 services require significant investments by telecommunications service providers and public safety agencies. This shared responsibility has continually delivered upgraded public safety services for the benefit of all Canadians, and the model must remain in place. Specifically, while wireless service providers are always willing to make the necessary investments to meet regulatory requirements for new and improved 9-1-1 services, required upgrades to PSAP equipment must continue to be the responsibility of public safety authorities.
13. To ensure the investment requirements for 9-1-1 service are appropriately shared the regulatory framework for NG9-1-1 should specify that telecommunications service provider responsibility terminates at the PSAP building. That is, all necessary upgrades inside of PSAP locations are the responsibility of public safety authorities, while exterior network upgrades will continue to be paid for by service providers.

Conclusion

14. The wireless industry has always been a leader in enhancing 9-1-1 emergency service and will continue to support all actions related to emergency 9-1-1 services that will increase the safety of Canadians. Indeed, every time the wireless industry has been tasked with upgrading 9-1-1 capabilities, it has made all of the necessary investments to provide the new functionality on time. As more Canadians use wireless to do more, the industry's role in deploying new 9-1-1 service will become that much more important. To ensure that all future investments in 9-1-1 services are as effective as possible, the regulatory framework for NG9-1-1 must ensure that new services are forward-looking and responsive to consumer preferences, fully tested, and remain the shared responsibility of telecommunications service providers and public safety agencies.
15. We appreciate the opportunity to participate in this important consultation.

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