

November 30, 2000

Ms. Shirley Soehn
Executive Director, Telecommunications
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON K1A 0N2

Dear Ms. Soehn:

Re: Further Procedure – Emergency Call Services

1. The Canadian Wireless Telecommunications Association (“CWTA”) is in receipt of comments filed on behalf of the Alberta E 9-1-1 Advisory Association (“AEAA”), Bell Canada et al (“Bell”), Rogers Wireless Inc. and Microcell Telecommunications Inc. in response to Further Procedure – Emergency Call Services. No other comments were received.
2. The CWTA is pleased to file the following reply comments. The failure of the Association to reply to any particular argument put forward by other interested parties should not be construed as acceptance of, or agreement with, that argument.
3. Bell Mobility, a CWTA member, is not a party to these reply comments.
4. In its letter of November 20, 2000, the CWTA requested that any final determinations rendered by the Commission in this proceeding should apply to all service areas, whether 9-1-1 service is available or not. The CWTA also requested that current routing arrangements for wireless emergency calls continue until such time as wireless Enhanced 9-1-1 (“E9-1-1”) is in place, to allow wireless carriers to concentrate resources on the development and testing of wireless E9-1-1, and avoid multiple changes to routing arrangements and their potential impacts on wireless customers.

5. In comments filed November 20, 2000 (paragraph 10), Bell misrepresented the manner in which wireless carriers handle emergency calls. Bell states “End-customers should not be encouraged, let alone prompted by WSPs, to dial 0- for all emergency calls”. The CWTA notes that, unlike Bell¹, wireless carriers do not encourage customers to dial 0- for any emergency calls. In fact, wireless carriers allow customers to dial 9-1-1 for emergency calls even in areas where 9-1-1 service is unavailable. In the case of wireless, 0- emergency calls are primarily calls that are dialed “9-1-1” by wireless customers and translated to “0-” by a wireless carrier before the carrier routes the call to the Incumbent Local Exchange Carrier (“ILEC”). This ensures that wireless customers have convenient 3-digit access to emergency services in all wireless service areas, whether 9-1-1 service is available or not.

6. Translation by wireless carriers of 9-1-1 dialed calls to 0- is not common and occurs primarily in, but is not limited to, areas where 9-1-1 service is unavailable. Certain municipalities will not accept 9-1-1 calls directly from wireless carriers and specifically instruct wireless carriers to route emergency calls to 0-. There are also instances along municipal boundaries where, due to the propagation characteristics of radio signals, a customer placing an emergency call is situated in a different jurisdiction than the cellular/PCS site that receives and treats the call. These calls must be routed to zero to ensure an efficient and timely response to the call. This arrangement allows wireless customers the freedom to use one number to reach emergency service personnel wherever they are located. They are not required to decide, in a moment of stress, if 9-1-1 service is available before they initiate an emergency call, nor are they required to re-dial a 7-digit local or 10-digit toll-free number if 9-1-1 service is unavailable.

7. Bell further states, “0-ECRS should not be used to replace 9-1-1 service as it does not provide the same level of service quality to end-customers”. The CWTA notes that wireless carriers are not seeking to avoid, as the Commission stated in Telecom Order CRTC 99-1155 (“Order 99-1155”), their “responsibility to ensure proper routing of its 9-1-1 calls”. In fact, the current routing arrangements are in place primarily to meet the requirement to effectively route wireless emergency calls within current technical limitations. The CWTA notes that the end-customers Bell refers to are wireline customers, where ANI and ALI information is available to PSAPs. The CWTA recognizes that 0-ECRS will not pass ALI or ANI information to the PSAP once the call is completed, but under the current 9-1-1 access services, the ILECs are not capable of providing the PSAPs

¹ For example, Bell’s Ottawa local directory includes the note “Dialing problems? Just dial “0” (zero) and ask the operator to connect you to the required emergency number.”

with this information for wireless customers. It is clear that ALI and ANI are important components of the ILEC 9-1-1 service, and that wireless carriers do not have access to these components. In light of these limitations and apart from the significant issue of operator intervention, O-ECRS does in fact provide a similar level of functionality to wireless customers relative to that which is provided to wireless customers by the current ILEC 9-1-1 service.

8. The CWTA notes the concerns of AEAA regarding the routing of wireless emergency calls. It is an overstatement, however, to imply that wireless carriers are seeking to avoid terminating calls to the 9-1-1 platform. In fact, on the contrary, wireless carriers are eagerly awaiting the filing of a proposed tariff by TELUS that would provide wireless carriers the opportunity to connect their customers directly to the 9-1-1 platform under all call scenarios. However, since that tariff is not in place in Alberta or elsewhere in the country, wireless carriers have had to implement routing arrangements to address those situations, as discussed above, where the 9-1-1 platform cannot adequately route the call.
9. Further, in the case of a wireless emergency call placed near a municipal boundary, for example, if the call is directed to the incorrect PSAP, the receiving call agent could be required to perform the same function as the ILEC operator and locate the correct termination point for the call. These instances can create issues in terms of response time and other challenges for the agent handling the wireless emergency call. It is the position of the CWTA that denying wireless carriers access to O-ECRS will not eliminate these types of issues.
10. The CWTA reiterates that if the Commission decides the current wireless routing arrangements must be altered, O-ECRS must not be the only option available to wireless carriers. In its comments, Bell has not taken this possibility into account. Wireless carriers must retain the option of choosing wholesale directory assistance and local operator assistance service ("LOAS") to route emergency calls where it is not possible to route directly to the PSAP. A wireless carrier that wishes to provide its own operator services or that wishes to do business with an AOSP should not be obliged to make use of an ILEC LOAS for the specific purpose of routing O- emergency calls. At the same time, a wireless carrier that wishes to make use of an ILEC LOAS in order to benefit from the established competence of the ILEC operators in routing O- emergency calls should not be obliged to establish its own operator service platform or to otherwise pursue an alternative business model.

11. Moreover, the CWTA repeats the request that the Commission, should it require an alteration of current wireless routing arrangements, establish a minimum 6-month transition period to provide time to make the necessary network modifications.

12. Finally, with respect to either LOAS or 0-ECRS, minimum contract terms and volume requirements should not be required. The CWTA notes that Bell recognizes that wireless carriers will employ the services differently than by the Competitive Local Exchange Carriers ("CLECs") and Alternate Operator Service Providers ("AOSPs") for which they were designed. In their comments Bell acknowledges "that there is no technical barrier to prevent a WSP from (using 0-ECRS to terminate emergency calls)"

13. CWTA appreciates the opportunity to provide these reply comments.

Sincerely,

Electronic filing

J. David Farnes
Vice President
Regulatory Affairs

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