

November 20, 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. In accordance with the procedure in the Commission letter dated October 20, 2000, the Canadian Wireless Telecommunications Association (“CWTA”) provides these comments regarding the proceeding established by Telecom Order CRTC 99-1155 (“Order 99-1155”), *Emergency Call Services*.
2. The CWTA represents the wireless telecommunications industry in Canada. It has a membership base of more than 300 domestic and international companies. CWTA's members come from a variety of sectors, including mobile telephone service providers, paging companies, mobile radio, mobile satellite carriers, and fixed wireless service providers. In addition, CWTA represents a broad cross-section of manufacturers and equipment suppliers to the industry.
3. Bell Mobility, a CWTA member, is not a party to these comments.
4. Wireless carriers have voluntarily provided their customers with access to emergency services from the outset and they continue to contribute to the safety of wireless customers by providing them with ready access to emergency assistance, free of airtime charges. Apart from calling to

secure emergency assistance for themselves, wireless 9-1-1 callers often call to request assistance required by other citizens, and also to report serious crimes in progress. In light of this, the CWTA believes that wireless 9-1-1 makes a unique and important contribution to provincial and municipal law enforcement, and to the safety of communities throughout Canada.

5. CWTA has previously provided comments to this proceeding, both preceding and subsequent to Order 99-1155. CWTA has also commented on the Tariffs filed by Bell Canada (TN 6429), TELUS Communications Inc. (TN 192), and TELUS Communications B.C. (TN 4030).
6. In Order 99-1155, the Commission approved, with modifications, applications by certain Incumbent Local Exchange Carriers (“ILECs”) for the provision of wholesale directory assistance and local operator assistance service (“LOAS”) to Wireless Service Providers (“WSPs”) and Competitive Local Exchange Carriers (“CLECs”). The Commission also granted permission for the ILECs to withdraw line-side access to LOAS (i.e. 0- calls), with the exception of rural areas where no 9-1-1 service exists.
7. The exception to the removal of line-side access was granted to allow for the consideration of one issue, namely the routing of emergency calls from wireless carriers¹. The Commission recognized that, in certain circumstances, wireless carriers route emergency calls to the ILEC operator for handling. In some cases, this is the only way wireless carriers can ensure their subscribers receive assistance in emergency situations.
8. The Commission, in Order 99-1155, appears to have overlooked that this situation is not limited to areas where 9-1-1 service is unavailable. Certain municipalities will not accept 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

¹ 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 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.

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 is certainly not the wireless carriers' most desirable routing arrangement, but it is one that is common in certain regions of the country. As such, any final determinations regarding emergency call services should include all service areas, whether 9-1-1 service is available or not.

9. Concurrent to the proceedings related to 99-1155, in a letter dated November 9, 1999, the Commission directed the CRTC Interconnection Steering Committee ("CISC") Emergency Services Working Group ("ESWG") to explore technical solutions to ensure that all pay telephone users have prompt access to emergency response agencies by dialing 0-. The ILECs subsequently filed tariffs to provide Zero-Dialed Emergency Call Routing Service ("0-ECRS") to various service providers (Bell filed TN 6429, TELUS Communications filed TN 192, TELUS Communications B.C. filed 4030).
10. The LOAS tariffs were established to deal specifically with Directory Assistance and Operator Assistance services for CLECs. The Zero-dialed emergency call routing service came out of a requirement to ensure the customers of Alternate Pay Telephone Service Providers ("APTSPs") are able to reach the appropriate emergency response agency in a timely manner.
11. The CWTA notes that the Commission concluded in Order 99-1155 that it is the wireless carrier's responsibility to ensure the proper routing of its 9-1-1 calls. The wireless industry takes that responsibility very seriously. As the Commission is aware, the CWTA and its members are working with other stakeholders to develop permanent technical solutions that will evolve wireless 9-1-1 to a service which is at least equivalent, if not superior, to wireline Enhanced 9-1-1 ("E9-1-1"). However, these solutions are not yet in place.
12. In April 2000, the wireless industry, in conjunction with the Alberta E9-1-1 Advisory Association (AEAA) and TELUS Communications Inc. (TELUS)

successfully completed a 6-month, live wireless E9-1-1 trial. This trial provided the Public Safety Answering Position (“PSAP”) call taker, in real time, with a ten digit call-back number for the wireless customer placing the 9-1-1 call as well as information relating to the location of the wireless cell site receiving the 9-1-1 call. TELUS is expected in the immediate future to file tariffs to make this service available in British Columbia and Alberta. Once these tariffs are approved, commercial deployment of wireless E9-1-1 could commence thereby eliminating any need for wireless carriers to route calls to ILEC operators in those provinces. Planning is currently underway to conduct a similar trial in Ontario.

13. The introduction of wireless E9-1-1 will not only provide improved service to consumers and more useful information to emergency response agencies, it will also resolve the concerns of the ILECs with regard to line-side routing issues, as this service will be provided via trunk-side connections.
14. The Association believes that it may be feasible for wireless carriers to route all emergency calls via the trunk-side connections to be established following Commission approval of wireless E9-1-1 interconnection tariffs. Consolidation of traditional 9-1-1 calls, and the emergency calls under discussion in this proceeding, on common trunk-side connections could negate the need for wireless carriers and the ILECs to maintain two distinct facilities and services for wireless emergency calls. A common trunk group for all emergency calls could be more efficient in terms of economies of scale, could be less complex, and could be more permanent in nature than separate facilities and services. The Association recommends that the Commission direct the ILECs to address the feasibility of such a routing arrangement.
15. Under such an arrangement and to the extent technically feasible, the ILECs would receive and route all wireless emergency calls via trunk-side connections, whether the calls originate or terminate in an area with 9-1-1 service or in an area without 9-1-1 service. For emergency calls that terminate in an area without 9-1-1 service, the ILEC should be in a position to route the calls from the ILEC 9-1-1 platform to the emergency response agencies via some other means (i.e. via TOPS, or via 10-digit

PSTN numbers), to the emergency response agencies. The CWTA would expect such functionality to be incorporated into the ILECs' future wireless E9-1-1 interconnection tariffs if indeed trunk-side routing for such calls is feasible.

16. The CWTA notes that in paragraph 57 of Order 99-1155 the Commission found merit in the current routing arrangements for 9-1-1 calls employed by certain wireless carriers where it is not possible to route directly to the 9-1-1 system. The CWTA agrees with the Commission in this regard and requests the Commission allow the current routing arrangements to continue until such time as wireless E9-1-1 is in place.
17. The CWTA recognizes that the current 9-1-1 routing arrangements are interim solutions and cannot continue indefinitely. The use of 0-ECRS or LOAS as a replacement for current arrangements, however, would also serve only as temporary solutions. A requirement to change routing arrangements from one temporary, less than perfect solution to a second temporary, less than perfect solution is unnecessary. Such a requirement would be wasteful in as far as it would divert resources away from the testing and implementation of a permanent wireless E9-1-1 solution. Transitioning from the current arrangements, to interim 0-ECRS and or LOAS, and then to E9-1-1 may also be disruptive to wireless customers, especially to the extent that the modifications associated with this transition are not transparent to customers.
18. Should the Commission consider it necessary to require an alteration to the existing emergency call routing arrangements, wireless carriers must not be locked in to any one routing option. Wireless Carriers must be able to use either 0-ECRS or LOAS tariffs 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 0- 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 0- emergency calls should not be obliged to establish its own operator service platform or to otherwise pursue an alternative business model.

19. The CWTA notes that the ILECs recognize that other carriers have a choice in terms of the services used to route emergency calls. TELUS, in a letter to the proceeding associated with Order 99-1155 dated January 17, 2000 stated “that through either the existing LOAS and/or the proposed ES-OACS, carriers in the Companies’ serving territories will be able to route emergency calls from their end customers to the appropriate emergency response agency”. Bell, in a letter dated January 14, 2000 to the same proceeding, stated “that through either the Company’s existing LOAS service and/or its proposed 0-ECRS, carriers in the Company’s serving territory will be able to route emergency calls from their end-customers to the appropriate emergency response agency”.
20. With respect to 0-ECRS and LOAS, the CWTA submits that wireless carriers should not be required to commit to minimum contract terms. Minimum contract terms would deter wireless carriers from implementing the preferred solution for emergency call handling. With the imminent introduction of wireless E9-1-1 in TELUS territory, and the expected trial and introduction in Bell territory, wireless carriers should be allowed the flexibility to begin offering wireless E9-1-1 service as soon as it becomes available. Minimum contract terms would create an unnecessary impediment for wireless carriers that seek to improve the level of service provided to their customers. The implementation of E9-1-1 must not be hindered by minimum contract terms associated with 0-ECRS and LOAS.
21. With respect to 0-ECRS and LOAS, the CWTA submits that wireless carriers should not be compelled to commit to minimum volume requirements. Given that the emergency calls in question represent only a small subset of the total calls generated by wireless customers, it is unlikely that wireless carriers would be able to meet the minimum volume requirements contemplated in the tariffs. With respect to LOAS, as this service would be used solely for emergency calls by some wireless carriers, the minimum volume requirements are inappropriate. Any minimum volume requirement associated with emergency calls would effectively force wireless carriers to make use of the ILEC’s operator services for non-emergency calls in order to meet the required minimum volumes. This would be especially problematic in cases where wireless carriers are already under contract with another provider of operator

services. In light of the above, minimum volume requirements for emergency calls are entirely inappropriate.

22. Should the Commission consider it necessary to require an alteration to the existing emergency call routing arrangements, wireless carriers must be afforded with adequate time to negotiate, plan and implement the necessary modifications. Adequate time is required to ensure that wireless emergency calls will not be jeopardized in any way by the transition from the current arrangements to whatever arrangements the Commission deems to be required. Once the Commission has rendered a final decision in this proceeding, careful planning and implementation are essential to ensure that service disruptions to wireless customers will be minimized, if not avoided entirely. As these alterations would require major network changes on the part of wireless carriers, the CWTA requests a period of 6 months, in accordance with Telecom Letter Decision CRTC 94-11. In light of the critical nature of emergency calls, the CWTA views this approach as being sensible, reasonable, and in the best interest of wireless customers.

Recommendations

23. It is the view of the CWTA that any final determinations rendered by the Commission respecting emergency call services should apply to all service areas, whether 9-1-1 service is available or not.

24. The CWTA requests that current routing arrangements for emergency calls should continue until such time as wireless E9-1-1 is in place. This will allow wireless carriers to concentrate resources on development of wireless E9-1-1, and minimize the number of changes to routing arrangements and their potential impacts on wireless customers.

25. If the Commission does not see fit to permit the current routing arrangements to continue until such time as wireless E9-1-1 is in place, the CWTA respectfully requests the Commission to grant the following relief:

- a. Grant wireless carriers the option to use either 0-ECRS or LOAS tariffs to route emergency calls, and.
 - b. Give wireless carriers a six-month transition period to implement any modifications required as a result of any Commission directives issued further to this proceeding.
26. Furthermore, during this interim period of finalization of trunk-side arrangements, wireless carriers should not be required to commit to either minimum volume requirements or minimum contract terms for either 0-ECRS or LOAS service.

Sincerely,

Electronic filing

J. David Farnes
Vice President
Regulatory Affairs

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