

February 12, 2001

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

Dear Ms. Soehn:

Re: Public Notice CRTC 2000-151

1. The Canadian Wireless Telecommunications Association (CWTA) is in receipt of comments filed by AT&T Canada (AT&T), Bell Canada (on behalf of itself, Island Telecom, Maritime Tel & Tel, MTS Communications, NBTel, NewTel Communications, and SaskTel) (Bell et al), City of Calgary, Call-Net Communications, CNIB, Federation of Canadian Municipalities (FCM), TELUS Communications, City of Toronto, United Way of Canada (on behalf of itself, InformCanada, Community Information Toronto and United Way of Greater Toronto) (United Way et al), and United Way of the Lower Mainland in response to Public Notice CRTC 2000-151 regarding three-digit dialing for national agencies' information services..
2. CWTA is pleased to provide these 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 et al propose to “implement without additional charge, the switch modifications and network changes required to route calls dialed using 211 to the various community call center locations and to undertake any internal administrative work activities”. As noted below, members of the CWTA are unable to commit to any activities until all implementation issues have been resolved. At paragraph 58 of its application the United Way states that the geographic area that would be served by 211 services

may be a city, a region or a province. The scope of geographic coverage has differing implementation and thus cost implications as it relates to both initial and ongoing facilitation of this access service. The wireless industry recognizes that United Way et al, in its application, attempted to minimize the impact of its service on TSPs, but there remains the possibility of unforeseen costs. As such, CWTA members are not prepared to absorb these unknown costs.

4. At paragraph 15 of its comments, Bell et al suggest that there is no need to address technical issues at the CISC. At paragraph 16 they further propose that the Community Information Referral Service (CIRS) agency be responsible for coordinating service provisioning amongst the CIRS groups and TSPs operating in a particular area. CWTA submits that any technical issues should be addressed under the auspices of the CISC. The creation of a separate forum lead by would-be N11 service providers may prove unworkable both in terms of responsible notification and questions of process and administration. The CISC provides an established and accepted process for these issues, and should be used. The CWTA believes that, under the CISC, the industry and other interested parties could develop N11 implementation guidelines. Such guidelines could address everything from application to implementation. Once these guidelines are in place, they could serve to govern regional coordination of service provisioning between the N11 service providers, such as a CIRS agency, and the TSPs in the region. Such guidelines would ensure that N11 services are implemented consistently across the country.
5. At paragraph 16, Bell suggests that the 12 week notification period to TSP to activate 211 may not be sufficient. The CWTA agrees and would support a longer notification period.
6. Several Parties argued that N11 should only be allocated to not-for profit entities. The CWTA believes this may be an unnecessarily restrictive criteria. It should not be assumed that where a fee is charged, a service is of no social value. 4-1-1 is an example of a service where a fee is charged but where there is a clear social value.
7. At paragraph 10 of its comments Call-Net suggests that would-be N11 providers demonstrate the suitability of using a three-digit access code versus another telecommunications solution. The CWTA agrees that there must be a convincing rationale (emergency, customer confusion) for using a three digit code versus another arrangement (1-800 or ADA).

8. Finally, the CWTA requests that the Commission, in its decision, clearly enunciate whether the N11 would be assigned to an entity or service and whether TSPs are obligated to provide access to said service.

Sincerely,

Electronic filing

J. David Farnes
Vice President
Regulatory Affairs

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