

September 1, 2021

Mr. Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, ON
K1A 0N2

By: Intervention Comment Form

Dear Mr. Doucet:

Subject: Telecom Notice of Consultation CRTC 2021-191, Call for comments – Introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services (Public record: 1011-NOC2021-0191)

1. The Canadian Wireless Telecommunications Association (“CWTA”) is the authority on wireless issues, developments and trends in Canada. Its membership is comprised of companies that provide services and products across the wireless industry, including wireless carriers and manufacturers of wireless equipment, who combine to deliver Canada’s world-class wireless services, one of the key pillars on which Canada’s digital and data-driven economy is built.
2. CWTA is pleased to participate in this important proceeding and to submit the following comments to the Canadian Radio-television Telecommunications Commission (the “Commission” or the “CRTC”) on behalf of its wireless service provider (“WSPs”) members, and in its role as Common Short Code (“CSC”) administrator.

Introduction

3. CWTA’s comments in this proceeding will currently be limited in response to Question 8 (Q8. Should the ability to text directly to the three-digit code be implemented?). However, CWTA will review the interventions put forward and provide additional comments in the reply stage as appropriate or necessary.
4. CRTC notes at paragraph 9 that “matters pertaining to the governance and coordination of mental health crisis and suicide prevention organizations and the funding of mental health crisis and suicide prevention services will not be considered in this proceeding”. As some of this information is relevant to the questions being posed, CWTA has noted assumptions that were

made and highlighted additional areas where further review may be necessary once the Commission issues a decision.

5. CWTA will be interested in the views of the mental health crisis and suicide prevention services providers that are captured as part of this proceeding as they will allow all stakeholders to better understand the operational elements that will need to be in place to support such a program, which in turn will shed light on the network and technical requirements.

Background

6. As noted, CWTA administers CSCs in Canada, a role it has filled at the request of the industry since 2003, in cooperation with a broad group of wireless service providers.¹ CSCs can be activated on mobile phone networks for the same application or service and have the added benefit of providing a consistent user experience across all carriers.
7. CWTA facilitates the commercial availability of CSCs on behalf of the WSPs, maintains a registry of all in-use and available CSCs, and is the principal point of contact to parties interested in leasing a CSC.
8. Traditionally, a CSC is a 5 or 6-digit number that replaces a telephone number for the purposes of sending SMS content to a user. There are several CSCs currently being leveraged to provide mental health crisis and suicide prevention services in Canada, notably:
 - Canada Suicide Prevention Service: **45645**
 - Kids Help Phone: **686868**
 - Crisis Text Line (powered by Kids Help Phone): **741741**
 - The Ontario Association of Distress Centres: **258258**
 - Talk4Healing (Indigenous support line): **825544**²
9. In very specific circumstances a 3-digit number may also be considered a CSC if two or more separately owned WSPs independently agree to participate in the proposed program³. This allows a code, such as 988, to be classified as a CSC, and for all applicable CSC requirements to be imposed on its use.

¹ In this instance wireless service provider means the wireless operators offering CSCs, and represented by: BCE Inc. (Bell Mobility, Bell MTS, Lucky Mobile, PC Mobile, Virgin Plus), Eastlink, Execulink, Fibernetics, Iristel (ICE Wireless), Shaw Communications Inc. (Freedom Mobile, Shaw Mobile), Rogers (Chatr, Fido), SaskTel, SSI Canada, Tbaytel, TELUS (Koodo, Public Mobile), Vidéotron (Fizz), and Xplore Mobile.

² This number is currently leased however it is not clear whether the service has been implemented.

³ There are currently several 3-digit CSC in market, including: 211, 311, 811, and 110 (Google verification).

Assumptions

10. Enabling texting using a 3-digit code, such as 988, to reach mental health crisis and suicide prevention services should be implemented by establishing a new CSC (further explained in this intervention) as this is the only viable way to implement texting to a 3-digit code.
11. For the benefit of this response, CWTA has made the following assumptions:
 - 988 will be the 3-digit code assigned for use for both voice-dialed calls, and texting.
 - 988 text service messages will be delivered to a single location (i.e., to the 9-8-8 provider's aggregator which will manage how the texts will be handled beyond that point).
 - Texting to 988 will be made available nationally at the same time and will not be rolled out over a defined timeframe.
 - 988 will support text-only interactions at launch. Multi-media messaging (MMS) via CSCs is not currently supported by all carriers.
 - All WSPs have, or will be able to, establish agreements and connectivity with the aggregator selected by the 988 service provider.

Q8. Should the ability to text directly to the three-digit code be implemented?

12. Should Commission decide to move ahead with mandating the texting functionality, this will need to be considered carefully and may require further review once additional details and information on the service itself becomes available. While this consultation will provide information on options being identified as feasible, even the most promising option needs to be reviewed with the benefit of clarity. This will be especially relevant when determining timelines.
13. The US is currently undergoing a similar exploration with the recent Federal Communications Commission's (FCC) Further Notice of Proposed Rulemaking⁴ and it is expected that they will implement a texting solution in July 2022, which aligns with the current deadline for implementation of the voice solution. A final decision as to implementation approach has not been made.
14. CWTA expects that the most promising solution resulting from the CRTC consultation, and specific to implementation of 988 texting, will be to establish a new 988 CSC. All WSPs' end-users will be able to communicate with the dedicated Call Centre by texting 988.

a) What are the advantages and challenges associated with such an implementation? What are the solutions for overcoming the identified challenges?

15. Texting is a ubiquitous form of communication; in many ways texting provides users with a platform to connect with others in a non-threatening and safe manner and offers increased privacy. In addition, an individual can message when speaking may not be an option.

⁴ Source: <https://www.fcc.gov/document/fcc-lays-groundwork-text-988>

16. From the perspective of the mental health crisis and suicide prevention service providers, texting offers the ability for increased adoption of the support line as not everyone feels comfortable speaking about their problems and may feel more comfortable texting. This may be especially true with youth or disadvantaged individuals or groups.
17. However, despite all its benefits, texting will offer challenges that will need to be considered once a solution is more clearly defined for 988 in Canada. For example:
- Consideration will need to be given to the capacity and robustness of the messaging platform adopted by the 988 service provider, and the degree to which it can integrate with existing systems.
 - Based on anecdotal feedback, it is expected that the implementation of 988 would yield a significantly higher volume of text interactions than what is currently being experienced. However, as the specific traffic volume and the way the service will be implemented are unknown, it is unclear whether the 988 service provider has the necessary capacity to support the increase in volume.
 - Additional testing will need to occur to understand whether texting 988 will trigger another CSC with that same prefix. Based on our experience with 811 and 811811, which are both in market, as well as preliminary handset testing, we do not expect issues. However, given the important nature of 988, and the existence of a CSC with the prefix 988, we would expect to undertake additional testing for validation.

b) Which texting protocols (e.g. SMS, real-time text [RTT] or Rich Communication Services [RCS]) should be considered, and why?

18. It is the view of CWTA that SMS would be the most suitable texting protocol for this service, given the information that is currently available and its use with similar mental-health programs.
19. SMS is the most ubiquitous protocol, has the benefit of longevity, and is not handset or operating system dependant.
20. More specifically, should SMS be the designated protocol, CWTA would recommend the use of a 3-digit CSC (988) for consistency with the dialing number and to maximize volume/throughput capabilities.
21. The majority of WSPs currently support the use of CSCs and have connections with a variety of aggregators (directly or indirectly). Any carrier not currently supporting CSC programs will need to enter into an agreement with the CSC Aggregator chosen/selected by the 988 service provider in order to support texting to 988.
22. CSC traffic traverses a specific network that is designed for high volumes.
23. Enabling a 3-digit CSC would allow for clear and consistent marketing / awareness campaigns to be developed – i.e. “text or call 988 to talk to someone...” – which would be of universal benefit.

24. At this point in the evolution of messaging, neither Real Time Text (RTT) nor Rich Communication Services (RCS) is suitable to support the provision of the proposed services.
25. As Commission is aware, RTT continues to be a *work in progress* within the Emergency Services [9-1-1] Working Group (ESWG) and the timing for its launch in relation to Enhanced 9-1-1 service is still to be determined. While progress has been made toward addressing the implementation of RTT, ongoing operational realities of RTT are unknown.
26. RCS (or, more accurately, given the proposed use case: “Rich Business Messaging”) is still in its infancy and faces handset and operating system limitations. Currently, RCS is only available on compatible Android devices and is not available on any Apple/iOS devices. In addition, some WSPs do not have plans to launch RCS.

c) How much time would be required for the implementation of this functionality?

27. In general terms, once an application is submitted for review, and assuming that the program information is complete and all relevant “readiness” documentation is submitted in a timely manner, the 988 provider’s program may receive approval and be provisioned on the WSPs’ networks within 4-6 weeks. That said, the implementation timeline for a CSC is dependent on several factors that fall outside of applying and securing the CSC itself. The time necessary to complete these essential elements falls outside of CWTA’s purview or control.⁵
28. To be clear, provisioning the CSC does not automatically make it “usable”, and that will only be determined by the 988 provider and its aggregator.
29. Given the nature of the service that is being contemplated, it is essential that all elements be 100% ready at launch in order to ensure that users of the service have confidence in the system and receive the experience they need and expect (i.e., it is available and reliable).

d) What are the costs associated with the implementation of this functionality? Which entities should bear the associated costs? Should these entities be permitted to recover these costs? If so, how?

30. On the CWTA side, there are normally fees that include an application deposit and monthly lease fee, both of which may be waived in the case of 988 service. Beyond this, Wireless Service

⁵ The 988 service provider must secure an aggregator if it does not already have one. The aggregator is a third-party who would connect, via Short Message Peer-to-Peer protocols (SMPP), directly to WSPs in order to offer SMS texting services to users via a 988 short code on behalf of the 988 service provider (i.e. the national suicide call centre and affiliated local call centres). In addition to securing SMPP connectivity with the WSPs, an aggregator is able to actively work on behalf of the 988 service provider to meet the necessary requirements. (We understand that Canada Suicide Prevention Service, identified at paragraph 7 of CRTC 2021-191) currently makes use of an aggregator to enable texting via its existing CSC (and its 10-digit number in select areas).

Providers, Aggregators and Application Service Providers⁶ may have their own fees but CWTA has no insight regarding these or any fees that it does not charge.

Summary

31. The most promising solution will be to establish a new 988 CSC. WSPs' end-users will be able to communicate with the dedicated Call Centre by texting 988.
32. SMS is the most ubiquitous protocol, has the benefit of longevity, and is not handset or operating system dependant.
33. A variety of service providers currently use CSCs to provide support and programs similar in nature to that currently being contemplated.
34. The majority of WSPs already support the use of CSCs and have connections with a variety of aggregators (directly or indirectly). CSC programs can typically be provisioned on WSP networks within 4-6 weeks.
35. Enabling a 3-digit CSC would allow for clear and consistent marketing / awareness campaigns to be developed – i.e. “text or call 988 to talk to someone...” - which would be of universal benefit.

Conclusion

36. CWTA thanks the Commission for the opportunity to provide feedback on this important proceeding and looks forward to the ongoing collaborative discussion that will bring 988 to fruition.

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⁶ An Application Service Provider (or ASP) is an organization that offers network based software solutions “applications”, or downloadable applications that enable the business logic behind mobile marketing initiatives.