

March 7, 2022

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) - Request for information**

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 its responses to the Canadian Radio-television Telecommunications Commission’s (the “Commission” or the “CRTC”) Request for information (RFI) on behalf of its wireless service provider (“WSPs”) members.
3. CWTA notes that its response is limited to Question 1. CWTA will defer to the responses provided by individual WSPs in relation to the remaining RFIs that were addressed to CWTA since WSPs are better equipped to address 9-8-8 wireless network implementation issues.

**Question 1: On 16 July 2020, the Federal Communications Commission (FCC) required United States telecommunications carriers and voice over Internet Protocol providers to make necessary modifications to implement a three-digit code (i.e. 9-8-8) for a national mental health crisis and suicide prevention hotline by 16 July 2022. On 19 November 2021, the FCC also required covered text providers to implement text-to-9-8-8 by the same date.**

**In light of the fact that Canadians, particularly those residing near the United States border, may be made aware of the implementation of such a code in the United States by 16 July 2022, what measures could be taken in Canada by telecommunications service providers to attenuate the risk**

**that Canadians calling or texting 9-8-8 from that date will not be able to reach the help they need? Also elaborate on your view on the appropriateness of implementing such measures, including the advantages and challenges associated with their implementation.**

4. The United States (“US”) expects to implement 9-8-8 service for text and voice in July of this year. Given the importance of this service it is reasonable to assume that the US 9-8-8 mental health crisis and suicide prevention service provider will undertake an awareness/educational campaign, and that American media will also report on the service’s availability. As such, it is possible that some Canadians will also learn of its availability, but not appreciate its geographic limitations.
5. Should the Commission decide that interim messaging is necessary to mitigate potential consumer confusion, CWTA would be pleased to work with WSPs in the development of a common and consistent message for wireless calls and texts to 9-8-8 that cannot be completed. Such messaging would then be implemented by WSPs in their respective networks, as appropriate.
6. Common and consistent messaging would ensure that all wireless calls and texts to 9-8-8 that cannot be completed have access to the same information. While there are still many unknowns, CWTA expects that the message would, at a minimum, identify to anyone attempting to use 9-8-8 that the service is not available in Canada at this time. Message consistency would also help ensure that trust in the system is not negatively impacted, or eroded, in advance of service implementation.
7. Should the Commission be of the view that a broader educational campaign is necessary, this activity should be the responsibility of the 9-8-8 mental health crisis and suicide prevention service provider as they would be best positioned to understand how the service is received and understood, and where focus should be placed in terms of educating the public or increasing awareness of the service.

## **Conclusion**

8. 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 9-8-8 to fruition.

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