

August 25, 2025

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

By: Email

Dear Mr. Morin:

Subject: Comments on RFI Response, Telecom Notice of Consultation CRTC 2025-20, Call for comments – Improving the routing of 9-8-8 calls and texts (Public record: 1011-NOC2025-0020)

1. The Canadian Telecommunications Association (CTA) acknowledges the response from the Centre for Addiction and Mental Health (CAMH) to the Commission's Request for Information as filed on August 6, 2025.
2. The CTA is an industry association dedicated to building a better future for Canadians through connectivity. Our members include service providers, equipment manufacturers, and other organizations in the telecommunications ecosystem, that invest in, build, maintain and operate Canada's world-class telecommunications networks. Through our advocacy initiatives, research, and events, we work to promote the importance of telecommunications to Canada's economic growth and social development, and advocate for policies that foster investment, innovation, and positive outcomes for consumers.
3. CTA's comments are being submitted on behalf of our Members and will be limited to responses filed for Questions 1, 2 and 3. It should be noted that absence of a response to any other questions identified in the RFI should not be interpreted as agreement or disagreement with such proposals. To the extent that there is any inconsistency between our submission and that of an Association Member in this consultation, the submission of such member shall prevail with respect to its position on the relevant matter.

Question 1: Several telecommunication service providers (TSPs) commented that the Centre for Addiction and Mental Health (CAMH) has not provided evidence or specific examples to support its claim that some calls to 9-8-8 may not be routed properly or that the current 9- 8-8 service may not have adequate resiliency. Provide the following information reflecting the time since the service became operational in Canada on 30 November 2023:

a) the number of calls (separated by wireline and wireless, if applicable, and including those from blocked numbers) and the number of texts that have not been routed to the closest response centre to the caller's location under the existing 1-8XX routing mechanism, and the percentage that these numbers represent of the total number of calls and texts to 9-8-8; and

4. In its original **9-8-8 DID Transition Implementation Proposal**, CAMH identified a number of benefits that they felt would be attained with the implementation of a new routing approach. One of these elements was noted as being an “efficient emergency response” as local DIDs were “expected to reduce the time required to locate callers using emergency intervention.”¹

5. In its RFI response², CAMH has noted that they were “... seeking the CRTC's guidance and collaboration with industry partners to develop a robust, technology-agnostic solution that enables:
 - *Reliable 9-8-8 call routing based on a caller's actual location, ensuring that wherever possible, 9-8-8 can connect them to nearest possible responder.*
 - *The provision of 9-8-8 caller's location information to the responding 9-1-1 PSAP when a 9-1-1 intervention becomes necessary, while maintaining confidentiality for 9-8-8 calls that do not need an emergency intervention.*

¹ **Improved Service Stability:** Local DIDs ensure regional outages do not affect national service.

Efficient Emergency Response: Local DIDs are expected to reduce the time required to locate callers needing emergency intervention.

Seamless Provincial Support: Local DIDs support geographically-aware resource provision for callers who have area codes that do not match their physical location (e.g. those moving provinces or territories but keeping numbers from other provinces or territories).

Cost Savings: Transitioning to DIDs will result in substantial cost savings to the 9-8-8 service, as currently all calls to 9-8-8 are handled with consumption based billing and a transition to local DID termination is not, thus allowing us to adopt more consistent and predictable monthly expenses.”

² **Improving the routing of 9-8-8 calls and texts, Telecom Notice of Consultation CRTC 2025-20, CAMH Response to CRTC Request for information – 18 June 2025, page 2.**

- *A resilient infrastructure that mitigates the risk of nationwide outages, ensuring continuous access to the 9-8-8 service across Canada.”*

6. CAMH also provided a series of case studies that were intended to provide examples concerning the challenges with routing calls³. These include the following impacts:

“Impact: This scenario vividly demonstrates how reliance on area code-based routing for 9-8-8 calls can severely impede a rapid, life-saving intervention by directing emergency services to the wrong jurisdiction, creating unnecessary delays and operational burden for PSAPs.”

“Impact: This scenario illustrates real frustrations and concerns recently expressed to us by a major municipal police service regarding the number of 9-8-8 calls they were being asked to respond to for individuals physically located in other provinces. They highlighted the substantial time and resources required to manage situations outside their jurisdiction, especially those involving imminent risk that necessitate a hand-off to the correct authorities.

The scenario shows how the current routing mechanism not only places an undue burden on PSAPs responding to out-of-province incidents but also introduces dangerous delays in emergency response, and potentially compromises the life-saving mission of 9-8-8.”

“Impact: This case starkly demonstrates how reliance on imprecise location data derived from phone numbers can lead to profound confusion, wasted critical resources across multiple jurisdictions, and dangerous delays in reaching individuals in life-threatening situations, putting lives at risk.”

7. Given all the examples provided specifically mention the impacts to PSAPs or other emergency-related services, in taking calls and delivering services when a call is handed off by 9-8-8, it appears that the primary concern of CAMH is directly in relation to those calls. This is considerably different than the original in both tone and request and requires further analysis.

³ Ibid, page 4 and 5.

8. CAMH notes:

“Under the current toll-free service, all calls from blocked numbers cannot be geographically routed to the nearest response centre. These calls are instead directed to national responders, preventing access to responders closest to the caller’s location. This is a critical issue because in situations where there is an imminent risk, the inability to quickly determine a caller’s location can lead to delays in dispatching emergency services.”⁴

9. If this is the actual driver for the proposed DID changes, it has not only broadened the scope of the discussion but also heavily impacted the possible and potential solutions.
10. A cursory discussion with Members has reiterated the position already put forward: the proposed DID solution (which is still highly unclear for Members) will **not** solve the identified problem given that there are over 250 primary and secondary PSAPs in Canada, but not that many DIDs (or 9-8-8 calls centers). Even if the DID solution is implemented, the challenges faced by PSAPs and other emergency services when a wireless or VoIP call is received and transferred from 9-8-8 will continue.
11. CAMH’s new proposed scope of the issue – deploying emergency services to 9-8-8 callers that have chosen to block their location information – requires a collaborative discussion with all impacted stakeholders.
12. CTA respectfully asks the Commission, once again, to put a pause on the current proceeding to give Public Health Agency of Canada, CAMH, and service providers time to jointly discuss the proposals that have been put forward as part of this proceeding. Should the Commission decide that CISC is the forum where this discussion should occur, a report can be provided to the Commission to help support its decision making. As CTA has previously put forward: *“This approach would allow for an understanding of the issues being faced by all stakeholders in the delivery of a solution, and allow for a productive, pro-active and future-facing review. It would also allow for a more complete and data-supported discussion that will focus on specific concerns and use-cases in an environment more conducive to those discussions.”*

⁴ Ibid, page 3.

b) the number of outages that have occurred on the 9-8-8 network affecting either voice calls or text messages, including (i) the duration of each outage; (ii) how each outage was identified; (iii) the cause of each outage; and (iv) how the outage was resolved.

13. CAMH noted that “[t]he current toll-free system creates a single point of failure that can render the entire 9-8-8 network inaccessible during major telecommunications service provider (TSP) outages. Making sure that 9-8-8 can continue providing service during these outages is crucial, as any interruption to the 9-8-8 service could have devastating consequences for the people who are seeking help.”⁵

14. Since toll free services are a commercial service offered by multiple TSPs, CAMH should undertake a discussion with their respective provider to understand the options available to them. They may also wish to determine whether redundancy can be achieved by optimizing toll free services from multiple providers. It would be unreasonable to ask all Canadian TSPs to implement any kind of routing changes, which would inevitably introduce routing errors, while a much simpler solution can be deployed on a national basis by CAMH and its vendors to address routing redundancy and reliability.

Question 2: Several parties requested that the proceeding be placed on hold so that routing proposals could be collaboratively determined by members of the industry. TELUS Communications Inc. (TELUS) specifically suggested that this be tasked to the CRTC Interconnection Steering Committee (CISC) Network Working Group (Reply of TELUS, paragraph 5). If the Commission were to direct a CISC working group to propose a solution to improve the routing of 9-8-8,

a) identify what specific issues regarding the routing of 9-8-8 require resolution.

15. CTA supports a robust discussion within CISC to fully flesh out challenges identified with location geo-routing and calls from private numbers as noted in response to Question 1. As an example, a much simpler approach could be for CAMH to enhance its IVR and request each caller using a private number to manually select a proper 9-8-8 call center (e.g. per province or city).

b) comment on whether improvements are needed for the routing for text, VoIP, or VRS, or whether the solution should focus on calls to 9-8-8, noting that CAMH’s

⁵ Ibid, page 6.

proposal does not include any changes to the current routing for text, VoIP, or VRS.

16. As identified by CAMH in their response, the solution being contemplated is exclusive to voice calling, specifically calls originating from wireless networks. Any further discussion concerning proposed solutions should be limited to wireless calls.

c) comment on whether improvements are needed for wireline calls or whether the solution should focus only on improving the routing of wireless calls to 9-8-8, considering that several parties proposed routing solutions that focus only on improving the routing of wireless calls to 9-8-8, noting that wireline calls are already routed appropriately based on the area code of the caller.

17. As identified by CAMH in their response, the solution being contemplated is exclusive to voice calling, specifically calls originating from wireless networks. Any further discussion concerning proposed solutions should be limited to wireless calls.

Question 3: In response to some parties' concerns about routing to response centres under CAMH's proposal, CAMH clarified in paragraph 10 of its reply that "the service provider will instead route the call to a DID associated to the location where the call enters the service provider's network. That DID will route the call to CAMH who will then pass it on to the appropriate agent at the appropriate response centre closest to the caller.

a) Has CAMH identified the geographic areas associated with each proposed direct inward dialing (DID) number? If so, provide detailed maps showing the geographic areas.

b) How frequently does CAMH add or remove response centres and/or update the geographic area covered by a 9-8-8 response centre? Should a routing solution be able to support possible future additions or removal of response centres and/or allow for changes to the geographic areas?

18. In their response CAMH notes their "...intention is not to dictate a specific mapping or technical solution to the TSPs. Instead, we aim to determine the most effective way to process 9-8-8 calls and to eventually make 9-8-8 caller location available once the caller is transferred to the responding PSAP."⁶

⁶ Ibid, page 7.

19. As identified earlier in this response, a need for a thorough and complete discussion is necessary to understand what CAMH is looking to address so that all aspects of a solution can be investigated, with feedback provided by all impacted TSPs to ensure that changes are made in the most effective and efficient manner.
20. Further, ensuring that a broader discussion can occur will limit the potential for gaps and unintended consequences that a piecemeal approach will bring. It is clear from the record put forward that there is confusion on all sides in relation to the problem to be solved and this can only be resolved with a concerted and frank discussion.

Conclusion

21. CTA reiterates that the delivery of a viable 9-8-8 service is important and one that the telecom industry has demonstrated support for by ensuring that the required infrastructure is in place.
22. To ensure that an optimal solution is identified, CTA respectfully recommends and supports pausing the current consultation to allow all impacted parties an opportunity to collectively discuss the potential solution. This will allow for a more complete and collaborative review and ensure that any resulting proposal has been contemplated in a way that limits potential issues for service providers while delivering the benefits sought by CAMH.
23. CTA appreciate the opportunity to participate in this important discussion.

Kind regards,



Ursula Grant
VP, Industry and Consumer Affairs

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c.c.:

Lisanne Legros, CRTC, lisanne.legros@crtc.gc.ca;

Josiane Lord, CRTC, josiane.lord@crtc.gc.ca;

Filsan Gure, CRTC, filsan.gure@crtc.gc.ca;

Sarah McMaster, CRTC, Sarah.McMaster@crtc.gc.ca;

Loïc Yves Abena Fouda, CRTC, LoicYves.AbenaFouda@crtc.gc.ca;

Cameron Warriner, CRTC, cameron.warriner@crtc.gc.ca;

Bella Chu, CRTC, Bella.Chu@crtc.gc.ca;

Bell Canada bell.regulatory@bell.ca;

Bragg Communications Inc. (Eastlink) regulatory.matters@corp.eastlink.ca;

Canada Deaf Grassroots Movement canadadeafgrassrootsmovement@gmail.com;

Canadian Administrator of VRS (CAV), Inc. execdirector@cav-acis.ca;

Centre for Addiction and Mental Health dan.harren@camh.ca;

Deaf Well-Being Program kristen.pranzl@vch.ca;

Deaf Wireless Canada Consultative Committee, chair@deafwireless.ca

Eversa abeauchamp@eversa.co;

Northern Communication Services, Inc. erich.baumgartner@northern911.com;

Public Interest Advocacy Centre tdawood@piac.ca;

Quebecor Media inc. melanie.cardin@quebecor.com;

Rogers Communications Canada Inc. regulatory@rci.rogers.com;

Saskatchewan Telecommunications (SaskTel) document.control@sasktel.com;

Tbaytel laura.foulds@tbaytel.com;

TELUS Jeffrey.smith@telus.com;

Voice on the Net Coalition grichards@dickinson-wright.com;