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530

March 14, 2014

Mister John Traversy
Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau QC J8X 4B1

Re: Wireless Service Provider notification of Text with 9-1-1 transmission

Dear Mr. Traversy,

Please accept the following letter on behalf of the Ontario Provincial Police (OPP) pursuant to the CRTC directive to begin transmitting Text with 9-1-1 calls as of March 18, 2014.

In the communication provide by Bell Canada in Emergency Agency Information Update – Bulletin #144 – Text with 9-1-1 Update dated March 11, 2014, the Ontario Provincial Police were notified that Public Safety Answer Points (PSAPs) may receive wireless calls with a TXE or TXF class of service.

The OPP has been engaged and working diligently towards making the necessary network and system upgrades to convert from legacy 9-1-1 systems to the new Internet Protocol (IP) data network to provide services such as T9-1-1 to the Deaf, Hard of Hearing and Speech Impaired (DHHSI) community. In spite of our best efforts, we and many PSAPs across Canada will not be ready.

As of March 18, 2014, DHHSI subscribers who initiate a T9-1-1 call will be transmitted to PSAPs regardless of the status of their network conversion. 9-1-1 Operators will be responsible to determine the class of service designation which will distinguish a registered DHHSI caller. Without connectivity to IP network, 9-1-1 Operators will have limited means to communicate with the DHHSI caller.

Proceeding with the transmission of T9-1-1 calls to PSAPs further decreases the already tenuous public-safety confidence the DHHSI community experiences. There is great risk that many believe the 9-1-1 system can provide fast and effective response to emergencies, when the technological reality is quite the opposite.



PSAPs previously requested the CRTC consider the implementation of province wide roll out of T9-1-1 services to ensure members of the DHHSI community were assured of service in all areas of each province. Rather, PSAPs were assured that DHHSI registrants would be educated to the potential service limitations as network conversions occur across the country.

Upon review of the Text with 9-1-1 website, it's clear educational materials create consumer expectations that PSAPs still utilizing the legacy 9-1-1 network simply cannot provide.

The Ontario Provincial Police is an active member of the Emergency Services Working Group (ESWG) and remains committed to improving the quality and accessibility of 9-1-1 services across Ontario and Canada.

We urgently and respectfully request the CRTC either reverses the decision or discourages the practice of sending Text with 9-1-1 calls on legacy 9-1-1 networks.

Sincerely,

Communications and Technology Services Bureau
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