



Telecom Regulatory Policy CRTC 2011-426

PDF version

Route reference: Telecom Notice of Consultation 2011-73

Ottawa, 14 July 2011

Provision of a 9-1-1 caller's telephone number to nomadic and fixed/non-native VoIP service providers' 9-1-1 operators

File number: 8663-C12-201102318

In this decision, the Commission directs nomadic and fixed/non-native voice over Internet Protocol service providers to provide their customers' telephone numbers to their 9-1-1 operators. The operators are to use the numbers provided as a last resort to re-establish contact with a 9-1-1 caller when the call is disconnected before the caller's location has been determined.

Introduction

1. In Telecom Notice of Consultation 2011-73, the Commission initiated a proceeding to examine the appropriateness of requiring nomadic and fixed/non-native voice over Internet Protocol (VoIP) service providers to put in place the capability to provide a 9-1-1 caller's telephone number to their 9-1-1 operators.
2. The Commission received comments from l'Association des centres d'urgence du Québec and l'Agence municipale de financement et de développement des centres d'urgence 9-1-1 du Québec (collectively, the Coalition); Bell Aliant Regional Communications, Limited Partnership and Bell Canada (collectively, the Bell companies); MTS Allstream Inc. (MTS Allstream); the Ontario 9-1-1 Advisory Board; Primus Telecommunications Canada Inc.; Quebecor Media Inc.; Rogers Communications Partnership; and TELUS Communications Company (TCC). The public record of this proceeding, which closed on 31 March 2011, is available on the Commission's website at www.crtc.gc.ca under "Public Proceedings" or by using the file number provided above.

Background

3. In Telecom Decision 2005-21, the Commission determined that the type of 9-1-1 service that a carrier must provide to VoIP subscribers would depend on the type of VoIP service the carrier offers. In recognition of certain technical challenges, the Commission directed nomadic and fixed/non-native VoIP service providers (collectively, VSPs) to provide access to a 9-1-1 service that is functionally comparable to Basic 9-1-1 service.¹

¹ Basic 9-1-1 service connects a 9-1-1 call to a public safety answering point (PSAP) that serves the location of the caller. The customer's location and telephone number are provided verbally to the PSAP.

4. In that decision, the Commission also determined that VSPs, for their 9-1-1 VoIP services, should use an intermediary operator whose responsibility is to obtain the 9-1-1 caller's geographical location and transfer the call to the public safety answering point (PSAP) that serves that location. The Commission indicated that the intermediary, referred to as a VSP operator, could be the VSP's internal call centre operator or a third-party operator.
5. In Telecom Circular 2008-2, the Commission summarized the emergency service obligations of nomadic local VoIP service providers related to determining the location of a 9-1-1 caller. The Commission noted that if a 9-1-1 call is disconnected before the VSP operator can verbally determine the caller's location, the operator must attempt to call back in order to determine the caller's location.
6. Most VSPs currently provide their VSP operators with a 9-1-1 caller's telephone number to enable them to call back. However, in the proceeding that resulted in Telecom Decision 2011-72, certain parties noted that because VSPs had not been mandated to provide a 9-1-1 caller's telephone number to the VSP operator, some VSPs currently do not support this capability.
7. In Telecom Decision 2011-72, the Commission noted that some parties to that proceeding indicated that mandating the provision of a 9-1-1 caller's telephone number to the VSP operator would enhance public safety for VSP customers. Consequently, the Commission issued Notice of Consultation 2011-73 to determine whether VSPs should be required to put in place the capability to provide a 9-1-1 caller's telephone number to their VSP operators.

Should VSPs be required to put in place the capability to provide a 9-1-1 caller's telephone number to their VSP operators?

8. Parties that participated in this proceeding indicated that a requirement for VSPs to provide a 9-1-1 caller's telephone number to the VSP operator would improve the VSPs' existing 9-1-1 service. They submitted that having access to the 9-1-1 caller's telephone number would allow the VSP operator, if necessary, to call a 9-1-1 caller back if the call is disconnected before the caller's location has been determined.
9. Most VSPs that participated in this proceeding, except the Bell companies, confirmed that they currently provide their VSP operators with their customers' telephone numbers. The Bell companies supported the Commission mandating this requirement and indicated that they could implement the capability in nine months.
10. The Bell companies and the Coalition raised concerns about the reliability of telephone numbers provided in certain situations. They indicated that there have been cases where subscribers, as a prank, have spoofed or changed a telephone number to appear to be calling from a different number, as well as cases where hackers have changed a customer's number in the VSP's database. As such, they recommended that the telephone number provided by the VSP should only be used as a last resort.

11. MTS Allstream and TCC opposed mandating the requirement for multi-line business customers, arguing that the telephone number provided is not useful in some cases. They indicated that for some multi-line customers, the number provided to the VSP could be a general telephone number for the organization and would not directly reach the 9-1-1 caller (e.g. if an extension number is required), or the number provided may be a number that cannot be called back (e.g. for an outbound-only telephone service).
12. Parties noted that different terms are used to refer to telephone numbers, such as calling line identification (CLID)² and automatic number identification (ANI),³ and that industry players use these terms differently or interchangeably because they usually refer to the same telephone number. While most VSPs expressed a preference for providing CLID to VSP operators, others were of the view that VSPs should be permitted to provide either CLID or ANI. Parties generally requested that the Commission set out a clear definition of which telephone number is to be provided to VSP operators.

Commission's analysis and determinations

13. The Commission notes that most VSPs already automatically provide their VSP operators with their customers' telephone numbers when 9-1-1 calls are made, and that the Bell companies could implement the capability in nine months. The Commission considers that having access to 9-1-1 callers' telephone numbers would allow the VSP operator, if necessary, to call a 9-1-1 caller back if the call is disconnected before the caller's location has been determined. The Commission considers that this would improve the VSPs' existing 9-1-1 service, for those that currently have not implemented this capability. Therefore, the Commission considers that requiring VSPs to provide their customers' telephone numbers to their VSP operators will enhance public safety and will not require changes to the existing 9-1-1 service provided by most VSPs.
14. The Commission also notes that some parties raised concerns about the reliability or usefulness of telephone numbers in particular situations. However, the Commission considers that even in those situations, the provision of a telephone number could be beneficial to the VSP operator in trying to re-establish contact with the 9-1-1 caller, as compared to not having a number to call back at all. In addition, attempting to call a telephone number, even when the number may not be reliable or may not reach the 9-1-1 caller directly, does not cause any additional harm. At a minimum, the VSP operator will be able to inquire whether the 9-1-1 call was made by the subscriber with that telephone number. For multi-line business customers, the VSP operator, by calling the telephone number, may be able to establish the location or the organization from which the 9-1-1 call was made.

² CLID is the telephone number transmitted by switches and is associated with a customer's phone line or equipment.

³ ANI is the billing telephone number.

15. The Commission therefore considers that when a 9-1-1 call is disconnected before the caller's location has been determined, the VSP operator should, as a last resort, use the telephone number provided by the VSP to attempt to call back.
16. The Commission notes that CLID and ANI represent the same telephone number for most subscribers. The Commission considers that the provision of either CLID or ANI to the VSP operators would offer additional benefits over not providing any telephone number. Therefore, since most VSPs are already providing one of these telephone numbers to their VSP operators, the Commission considers that VSPs should be given the flexibility to implement either CLID or ANI.
17. The Commission therefore directs VSPs to
 - implement the capability to provide their VSP operators with a 9-1-1 caller's telephone number, within **9 months** of the date of this decision; and
 - require their VSP operators to use the provided telephone number as a last resort to re-establish contact with a 9-1-1 caller, when a 9-1-1 call is disconnected before the caller's location has been determined.
18. The Commission also directs Canadian carriers, as a condition of providing telecommunications services to VSPs, to include in their service contracts or other arrangements with these VSPs the requirement that the VSP, and any other VSP reseller that may subsequently resell those services, comply with the Commission's determinations in this decision.

Secretary General

Related documents

- *Proceeding to review the appropriateness of requiring nomadic and fixed/non-native VoIP service providers to implement automatic number identification capability*, Telecom Notice of Consultation CRTC 2011-73, 8 February 2011
- *Bell Aliant Regional Communications, Limited Partnership and Bell Canada – Application to review and vary Telecom Decision 2010-387 regarding the application of directives for 9-1-1 VoIP service*, Telecom Decision CRTC 2011-72, 8 February 2011
- *Emergency service obligations of nomadic local VoIP service providers related to determining the location of a 9-1-1 caller*, Telecom Circular CRTC 2008-2, 28 July 2008
- *Emergency service obligations for local VoIP service providers*, Telecom Decision CRTC 2005-21, 4 April 2005