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FILED BY GC KEY

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

Dear Mr. Doucet,

**Telecom Notice of Consultation CRTC 2020-326, Call for comments –
Establishment of new deadlines for Canada’s transition to next-generation 9-1-1
(“TNC 2020-326”)(Public record: 1011-NOC2020-0326) – Reply**

1. Xplornet Communications Inc. and Xplore Mobile Inc. (collectively, “Xplornet”) have reviewed comments filed by parties to the above-noted proceeding and are pleased to file the present reply comments.

**Q1(b): Readiness of Originating Network Providers (“ONPs”) to support Next
Generation 9-1-1 (“NG9-1-1”) Voice**

2. In Q1(b) of TNC 2020-326, the Commission has asked whether it is reasonable for ONPs to have their networks ready to support NG9-1-1 Voice by March 30, 2021.

3. As noted in our Intervention, Xplornet is currently working with its vendors to implement the changes necessary to support NG9-1-1 Voice; however, our vendors have told us that it is unlikely that they will be able to meet the Commission’s proposed deadline. We have thus requested that this deadline be extended until September 30, 2021, in order to ensure that there is adequate time for a solution design to be finalized, implemented and tested in advance of the Commission’s deadline.

4. We note that Xplornet is not alone in its concerns that it will not be able to meet the proposed deadline of March 30, 2021. Eastlink, for example, has also expressed concerns about being able to meet this proposed deadline.¹

¹ Eastlink Intervention, paragraphs 4 to 6.

5. While parties like Xplornet and Eastlink are already unlikely to be able to meet the proposed deadline as it stands, other parties have proposed to further advance this deadline. Shaw, for example, has argued that the proposed deadline should be moved up to December 31, 2020.²

6. Xplornet submits that the Commission should not advance its current proposed deadline. Adopting an earlier deadline would exacerbate the timing concerns expressed by Xplornet and Eastlink and also introduce timing problems for other parties. The ITPA has explicitly stated that it could not meet any deadline sooner than March 30, 2021.³

7. Accordingly, Xplornet submits that the Commission should reject any calls to advance the proposed deadline for ONPs to support NG9-1-1 Voice and instead revise this deadline to September 30, 2021. Extending the deadline would provide parties with the time needed to implement the changes necessary to support NG9-1-1 Voice.

Q1(c) and (d): Provision of NG9-1-1 Text Messaging

8. Numerous parties have noted that necessary standards have not yet been developed in order for NG9-1-1 Text Messaging to be fully functional and able to handle emergency calls.⁴ In light of this, Xplornet submits that, instead of establishing a deadline for the implementation of this service at the present time, the Commission should task CISC with continuing to monitor and report on the standards development work that is on-going to support NG9-1-1 Text Messaging. Once standards have been developed, the Commission could then establish a timeline for the implementation of the service. Alternatively, if the Commission establishes a timeline for the implementation of this service as part of the present proceeding, Xplornet submits that such a timeline should be conditional on standards being finalized and flexible to adapt to accommodate the standards development process.

9. In establishing any deadline for the implementation of NG9-1-1 Text Messaging, Xplornet additionally requests that the Commission ensure that Wireless Service Providers (“WSPs”) are granted an appropriate period of time to implement this service.

10. WSPs require interconnection specifications from NG9-1-1 network providers in order to implement NG9-1-1 Text Messaging. In its proposed timeline, the Commission has allowed a period of only six months from the proposed deadline for NG9-1-1 network providers to make their interconnection specifications available (i.e., September 30, 2021) until the time that WSPs are proposed to provide NG9-1-1 Text Messaging (i.e., March 30, 2022).

² Shaw Intervention, paragraph 13.

³ ITPA Intervention, paragraph 7.

⁴ See, for example, Bell Canada Intervention, pages 9 and 10; Eastlink Intervention, paragraph 7; Rogers Intervention, page 3; Telus Intervention, paragraphs 50 to 58.

11. Xplornet submits that six months following receipt of interconnection specifications is not long enough for WSPs to implement NG9-1-1 Text Messaging. Other parties have equally identified this period as being insufficient for WSPs. We note that Eastlink has requested that the Commission provide WSPs with a period of 18 months from the time that interconnection specifications are made available by NG9-1-1 network providers to implement NG9-1-1 Text Messaging.⁵

12. Accordingly, when the Commission establishes a deadline for WSPs to provide NG9-1-1 Text Messaging, whether as a result of this proceeding or through a future determination, Xplornet urges the Commission to provide WSPs with a longer period of time to implement NG9-1-1 Text Messaging following receipt of interconnection specifications from NG9-1-1 network providers.

Q1(e): Decommissioning of current 9-1-1 network components by Incumbent Local Exchange Carriers (“ILECs”)

13. Finally, Xplornet notes comments by Rogers⁶ and Shaw⁷ concerning the Commission’s proposal to extend the deadline for ILECs to decommission their current 9-1-1 network components that will not form part of their NG9-1-1 networks by March 30, 2024, instead of by the original deadline of June 30, 2023.

14. Xplornet agrees with Rogers and Shaw that the Commission should limit the period of time that current 9-1-1 networks and NG9-1-1 networks are both operational. Subscribing to both services will impose additional costs on service providers and Canadians and the Commission should take steps to minimize any additional costs imposed as a result of the transition to NG9-1-1 services.

15. We thank the Commission for the opportunity to provide these comments.

Yours truly,



Carl MacQuarrie

cc: Parties to TNC 2020-326

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⁵ Eastlink Intervention, paragraph 7.

⁶ Rogers Intervention, pages 3 to 4.

⁷ Shaw Intervention, paragraphs 20 to 27.