

November 9, 2020

FILED VIA: GCKEY

Claude Doucet
Secretary General
Canadian Radio–television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2

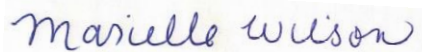
Dear Mr. Doucet:

Re: Telecom Notice of Consultation CRTC 2020-326 Call for comments – Establishment of new deadlines for Canada’s transition to next-generation 9-1-1 – Eastlink Reply Submission

1. Bragg Communications Inc., carrying on business as Eastlink (“Eastlink”), has reviewed the comments filed by other parties under Telecom Notice of Consultation 2020-326 *Establishment of new deadlines for Canada’s transition to next-generation 9-1-1* (the “Notice”) and herein provides our reply comments. Eastlink’s failure to comment specifically on certain issues raised in the Notice should not be interpreted as lack of interest or concern about those issues, nor should they be interpreted in a manner which would be contrary to Eastlink’s interests.
2. In the Notice, the Commission requested comments on whether it is reasonable and appropriate to direct ILECs to decommission their current 9-1-1 network components that will not form part of their NG9-1-1 networks by 30 March 2024. This represents an extension from the original decommissioning deadline of 30 June 2023.
3. With regards to the decommissioning date, Eastlink has reviewed the interventions filed by Shaw Communications Inc. (“Shaw”) and Rogers Communications Canada Inc. (“Rogers”) and we agree with their position that the original decommission date of 30 June 2023 should be maintained. Eastlink submits that the original timeline provides a 6-year implementation period, which is more than sufficient for designing, preparing and interconnecting with the new

NG9-1-1 networks. Additional time is not necessary, and keeping the original decommissioning date will allow Canadians to realize the benefits that NG9-1-1 has over the legacy 9-1-1 networks. In addition, as established in Telecom Regulatory Policy CRTC 2017-182 the existing tariff regime would remain in place during the transition from the current 9-1-1 networks to NG9-1-1 networks, and as a result TSPs will be subject to both the current 9-1-1 tariff rates and NG9-1-1 tariff rates during the transition period. Eastlink submits that the extra costs associated with running parallel 9-1-1 networks will ultimately be recovered from end-users. Other interveners have suggested a further extension with decommissioning dates extending as far as 2026. Eastlink submits extending this date past the initial date established in Telecom Regulatory Policy 2017-182 is unnecessary, would result in increased costs to service providers and end-customers, and would only delay Canadians from realizing the benefits of NG9-1-1.

Respectfully,

A handwritten signature in blue ink that reads "Marielle Wilson". The signature is written in a cursive style and is positioned above a light grey rectangular background.

Marielle Wilson
Vice President, Regulatory