



Ottawa, 3 June 2022

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BY EMAIL

Distribution list

RE: *Introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services, Telecom Notice of Consultation CRTC 2021-191 – Commission determinations in anticipation of the introduction of 9-8-8 in the United States*

With the issuance of [Telecom Notice of Consultation CRTC 2021-191](#), the Commission initiated a proceeding to establish the need for the implementation of a national three-digit code for mental health crisis and suicide prevention services (three-digit code), to identify the existing barriers to the establishment of such a code and, if necessary, to determine how these barriers can be overcome.

As part of this proceeding, Commission staff issued a request for information, in which, in light of the anticipated introduction of a three-digit code for a national mental health crisis and suicide prevention hotline (i.e. 9-8-8) in the United States on 16 July 2022, it requested comments on what measures could be taken in Canada by telecommunications service providers (TSPs) to attenuate the risk of someone in mental health crisis calling or texting 9-8-8 in Canada as of that date would not be able to reach the help they need. Therefore, given the timing of the introduction of 9-8-8 in the United States, the Commission is issuing its determinations on the matter in this letter.

Position of parties

Bell Canada et al.¹ submitted that the Commission could undertake an educational program to help reduce the risk that a help seeker attempt to reach assistance using the 9-8-8 number in Canada. Rogers Communications Canada Inc. (RCCI), Bragg Communications Inc., carrying on business as Eastlink (Eastlink), and the Canadian Wireless Telecommunications Association (CWTA) submitted that an eventual educational campaign should be the responsibility of the mental health crisis and suicide prevention service provider. The CWTA argued that this service provider would be best positioned to understand where a focus should be placed in terms of educating the public or increasing awareness of the service. Quebecor Media Inc., on behalf of Videotron Ltd. (Videotron) further submitted that it does not support each TSP to perform individual awareness campaigns. In addition, Distributel Communications Limited (Distributel) submitted that coordinated consumer awareness campaigns similar to those used to create awareness about the implementation of new numbering plan area or ten-digit local dialing could be used to inform customers that 9-8-8 is not yet available in Canada.

¹ Bell Canada on behalf of itself (including where it operates as Bell Aliant in Atlantic Canada and Bell MTS in Manitoba, and its divisions DMTS and KMTS); Bell Mobility Inc.; Groupe Maskatel Québec L.P.; NorthernTel Limited Partnership, including its division Ontera; Northwestel Inc.; and Télébec, société en commandite.

For mobile wireless calls and texts sent to the three-digit code, Bell Canada et al. proposed that the industry develop and adopt a common message across all wireless service providers (WSPs). Bell Canada et al. estimated that once the common message is developed, it would take approximately one month to implement the automatic message in its networks. For wireline calls, however, Bell Canada et al. indicated that in order to implement an automatic recorded announcement that 9-8-8 is not available, TSPs would have to implement 9-8-8 as a dialable code. Bell Canada et al. argued that attempting to implement a temporary fix on the wireline network could slow down the final implementation of 9-8-8 with little to no benefit to customers. TELUS Communications Inc. (TCI) submitted that TSPs could implement an automatic response for both voice and text messages for Canadians who attempt to dial 9-8-8. TCI suggested that the automatic response should be a common message across all TSPs and could include information that will allow the person attempting to use 9-8-8 to find the resources they need.

Similarly, Distributel and Eastlink submitted that TSPs could route calls to a recorded message that informs the caller that 9-8-8 is not yet available in Canada and provides information about when Canada's equivalent service will be available. They also indicated that, as an alternative, TSPs could route calls to 9-8-8 to a Canadian crisis prevention service on an interim basis. RCCI submitted that WSPs could implement an auto-reply message to text messages placed to 9-8-8. RCCI submitted that, however, to establish a network announcement for 9-8-8 voice calls on a wireless or wireline network, call routing translations and a network announcement would need to be established, and that it would be far more efficient to focus on the implementation of 9-8-8. Similarly, Videotron submitted that implementing an automatic announcement would require that the basic structure of 9-8-8 to be completed so that all calls made to 9-8-8 are routed to a standard message.

Iristel Inc. (Iristel) submitted that no special measures are needed to address the implementation of 9-8-8 in the United States. It argued that Canadians are able to distinguish between services offered in Canada versus those offered in the United States. Iristel and TekSavvy Solutions Inc. also submitted that any user attempting to dial 9-8-8 from a Canadian TSP from 16 July 2022 will receive a signal indicating that the call could not be completed. Iristel however submitted that a user who sends a text message to 9-8-8 may think the message has been sent and may not receive any indication otherwise, and that it may be prudent in the interim for WSPs to configure an auto-reply informing any user that sends a text message to 9-8-8 that the service is not yet available.

The Public Interest Advocacy Centre (PIAC) submitted that a consumer awareness campaign should be planned and executed before the launch of 9-8-8 in the United States to mitigate the risks for Canadian customers, and that all TSPs should be actively involved in raising awareness in addition to the Canadian mental health crisis and suicide prevention service provider. PIAC also submitted that given the challenges associated with a messaging system for the wireline networks, other complementary measures should be considered such as: providing consistent and common messages on TSPs' websites, social media, email correspondence and/or billing inserts. In addition, PIAC submitted that the CRTC Interconnection Steering Committee should look into the specific measures TSPs should take to ensure that a workable solution could be implemented on an immediate basis.

In reply to Eastlink's suggestion to reroute calls to an alternate number, Bell Canada et al. submitted that they would not be able to implement this solution on its wireline networks until 9-8-8 is a dialable code, which is not feasible until the 9-8-8 code is implemented in the hundreds of wireline switches across the Bell group of companies. They also argued that such routing

scenarios could simply confuse customers as to whether or not the 9-8-8 service is actually available or not in Canada and could even lead to routing errors.

Commission's analysis

The Commission considers that it would be appropriate to take certain measures addressing the national introduction of 9-8-8 in the United States on 16 July 2022 to attenuate the risk that someone in mental health crisis calling or texting this three-digit code in Canada would not be able to reach the help they need.

With respect to calls and text on mobile wireless networks, all mobile wireless networks in Canada already support ten-digit local dialing and are IP-based, which simplifies the implementation of network announcements and text auto-replies. As such, the Commission considers that it would be appropriate to require announcements on mobile wireless networks for both text and voice calls.

With respect to the content of such messages, the Commission considers that it would be appropriate to indicate, in both official languages, that 9-8-8 is not yet deployed in Canada, and provide information on Canada's suicide prevention service (e.g. the toll-free number 1-833-456-4566).

With respect to voice calls on wireline networks, implementing the necessary translations could be more challenging and time consuming compared to mobile wireless networks. Certain wireline networks in Canada are not completely IP-based, which means that more programming would be required to implement the necessary translations compared to an IP environment. In addition, implementing announcements on wireline networks could also take many months, and the required changes to wireline networks could interfere with the work that would need to be completed to implement ten-digit local dialing and/or a three-digit code, which may cause certain delays. As such, the Commission does not consider that it would be appropriate to require announcements on wireline networks.

However, given that it may be possible for certain TSPs with IP-based wireline networks to implement announcements without experiencing the same hurdles described above, the Commission encourages these TSPs to make the necessary changes to allow such announcements on their wireline network, as appropriate under each TSPs' specific circumstances.

In light of the above, the Commission requires mobile wireless carriers, as a condition of service pursuant to sections 24 of the *Telecommunications Act*, to implement announcements on their mobile wireless networks for voice calls and text by 16 July 2022:

- These announcements must be provided in both official languages; and,
- These announcements must inform people who dial 9-8-8 that 9-8-8 is not yet implemented in Canada, and provide information on Canada's suicide prevention service (e.g. the toll-free number 1-833-456-4566 for voice calls at any time, or the common short code 45645 for texts from 4pm to midnight Eastern Time).

In addition, the Commission considers it appropriate that local exchange carriers (LECs), WSPs, and local voice over Internet protocol (VoIP) service providers² support customer awareness efforts on the matter, and provide information about the non-availability of 9-8-8 on their websites, including information as to how to reach mental health crisis and suicide prevention services, as it would permit easily and quickly sharing this information with their subscribers.

As such, the Commission requires LECs, WSPs, and local VoIP service providers to indicate, on their websites, by 16 July 2022, that while 9-8-8 will be fully implemented in the United States on 16 July 2022, a three-digit number (such as 9-8-8) is not yet implemented in Canada, and provide information on Canada's suicide prevention service (e.g. the toll-free number 1-833-456-4566 for voice calls at any time, or the common short code 45645 for texts from 4pm to midnight Eastern Time).

Sincerely,

Claude Doucet
Secretary General

Distribution List:

Parties to Notice of Consultation 2021-191
WSPs and proposed full mobile virtual network operators
LECs and proposed competitive local exchange carriers
Resellers of telecommunications services

² Local VoIP service providers (i) provide their customers with telephone numbers that conform to the North American Numbering Plan, (ii) provide access to and from the public switched telephone network, and (iii) enable customers to make and/or receive calls that originate or terminate within an exchange or a local calling area.