



File No. 8638-B2202107268

2021 11 09

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

Subject: **Urgent and Expedited request for a Commission direction deferring the effective start date for the application of the STIR/SHAKEN condition from CETD 2021-123 to NG9-1-1 voice calls pending the development of milestones to be determined by the CISC ESWG and the CISC NTWG as may be approved by the Commission – Reply Comments**

Dear Mr. Doucet,

1. Further to a Commission Staff procedural letter, dated 1 November 2021, the Emergency Services Working Group (ESWG) and the Network Working Group (NTWG) CRTC Interconnection Steering Committee (CISC) Committees, supported by Bell, SaskTel and TELUS, hereby file these Reply Comments in respect of our above-captioned urgent and expedited 28 October 2021 application (Application).

2. Our Application noted the current absence of standards regarding the application of the STIR/SHAKEN authentication framework to emergency 9-1-1 calls. Our Application also highlighted the risk arising through the interplay of CETD 2021-123<sup>1</sup> and Decision 2021-199,<sup>2</sup> as early as 30 November 2021. The risk is that, in just a few short week's time, mandatorily applying STIR/SHAKEN to such calls could result in the misidentification of 9-1-1 calls as spoofed or misidentified calls, thereby creating confusion for the public safety answering point (PSAP), or worse, a risk that legitimate 9-1-1 calls could be dropped. To mitigate against this risk, our Application requested the following urgent Commission relief:

- (i) task the relevant ESWG and NTWG CISC Committees with monitoring standards work related to the application of STIR/SHAKEN to NG9-1-1 calls;
- (ii) direct these CISC Committees to report to the Commission semi-annually coincident with the semi-annual reporting dates (i.e., 31 August and 31 March) prescribed by the Commission in CETD 2021-123; and

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<sup>1</sup> Compliance and Enforcement and Telecom Decision CRTC 2021-123, *STIR-SHAKEN implementation for Internet Protocol-based voice calls*.

<sup>2</sup> Telecom Decision CRTC 2021-199, *Establishment of new deadlines for Canada's transition to next-generation 9-1-1*.

- (iii) defer the application of the STIR/SHAKEN Condition<sup>3</sup> until such time as the relevant CISC Committees report and recommend the application of the STIR/SHAKEN framework to 9-1-1 and next generation 9-1-1 (NG9-1-1) calling as may be approved by, and subject to, such conditions as the Commission considers appropriate.

3. Only two interveners commented on the Application, both expressing strong, unequivocal support, namely the Coalition pour le service 9-1-1 au Québec<sup>4</sup> and Shaw.<sup>5</sup>

4. The Coalition pour le service 9-1-1 au Québec stated: "Nous appuyons totalement la demande urgent..." Shaw stated that it too fully support[s] "the Applicants' request to defer the application of STIR/SHAKEN to both E9-1-1 and NG9-1-1 calls."

5. We wish to make just two brief reply comments.

6. First, there is unanimous support in favour of our request for a deferral of the STIR/SHAKEN framework to 9-1-1 calling and NG9-1-1 calling, such that the 30 November 2021 coming into force date for the application of the STIR/SHAKEN framework would be suspended for both 9-1-1 and NG9-1-1 calls. No intervener opposes this request. It is difficult to conceive how anyone could oppose an Application that is so fundamentally aligned with the public interest, that seeks to maintain the stability and reliability of 9-1-1 calling and prevent dropped and/or misidentified 9-1-1 calls and the associated risks to public health and safety such dropped calls would entail.

7. Second, and relatedly, we were pleased that both interveners agreed that the deferral should apply in the manner that we proposed. In other words, there is consensus that the STIR/SHAKEN Condition should be suspended relative to the application of all 9-1-1 calling until such time as the relevant CISC Committees report, with Commission approval, on the appropriateness of applying STIR/SHAKEN to all such 9-1-1 calls.

8. Shaw expressed a strong vote of confidence in the ability of the industry, through the CISC process, to work expeditiously on the delivery of both comprehensive standards and products that implement them:

In the case of NG9-1-1 calls, we are confident that the industry will work expeditiously to deliver comprehensive standards and products that allow for the safe application of STIR/SHAKEN to NG9-1-1 calls. Until that time, the Commission should clarify that telecommunications service providers that offer voice services do not need to apply STIR/SHAKEN to their customers' NG9-1-1 calls. The Commission should not require service providers to undertake any activities that would jeopardize the reliability of Canada's 9-1-1 systems.<sup>6</sup>  
[Emphasis added]

9. For all of these reasons we repeat and rely upon the submissions in our Application and reiterate our request for the issuance of the requested relief as expeditiously as possible for both 9-1-1 and NG9-1-1 calls.

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<sup>3</sup> In CETD 2021-123 at paragraph 22 the Commission directed as follows: "[...] pursuant to sections 24 and 24.1 of the Act, the Commission directs that, as a condition of offering and providing telecommunications services, TSPs must implement STIR/SHAKEN in order to authenticate and validate IP-based voice calls, effective 30 November 2021" (STIR/SHAKEN Condition).

<sup>4</sup> See: 2 November 2021, Submission number 298671, Coalition pour le service 9-1-1 au Québec.

<sup>5</sup> 8 November 2021 Shaw Intervention on its own behalf and its wholly owned wireless subsidiary Freedom Mobile Inc. (Freedom, hereinafter Shaw).

<sup>6</sup> Shaw Intervention, paragraph 5.

10. We thank the Commission for its urgent attention to this matter.



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Chair – CISC ESWG



Richard Polishak  
Chair – CISC NWG



Jonathan Blakey  
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John Mackenzie  
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