

Commander



Commandant

Canadian Joint Operations Command
Commandement des opérations interarmées du Canada
Ottawa, Ontario, K1A 0K2

Dated in e-signature

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

Dear Mr. Doucet,

Subject: Part 1 Application by CAF and CCG Requesting Secondary PSAP Designation for All Federal Joint Rescue Coordination Centres and Maritime Rescue Sub-Centres

This application is made pursuant to Part 1 of the Canadian Radio-television and Telecommunications Commission (CRTC) Rules of Practice and Procedures. The Applicant [Canadian Armed Forces (CAF) and the Canadian Coast Guard (CCG)] requests that the CRTC designate the federal Joint Rescue Coordination Centres (JRCCs) and Maritime Rescue Sub-Centres (MRSCs) as secondary Public Safety Answering Points (PSAPs). This designation will facilitate the effective delivery of federally mandated responsibilities for the provenance of aeronautical and maritime search and rescue (SAR) services and ensure the highest standard of care for all Canadians.

Background

The National Search and Rescue Program (NSP) is a Canada-wide horizontal program that integrates organizations and resources involved in the provision of aeronautical and maritime search and rescue services to Canadians, including emergency SAR response and prevention.

In Canada, SAR activities within the NSP span a multitude of jurisdictions, notably with the CAF retaining the responsibility for aeronautical incidents and the CCG the responsibility for maritime incidents. Provincial, territorial, and in some instances municipal governments are responsible for providing Ground Search and Rescue (GSAR) services. These GSAR services are often delegated to the police service of jurisdiction.

The CAF and CCG fulfill their federal SAR responsibilities through the efforts of three JRCCs and two MRSCs. Collectively, these five centres and three associated backup centres coordinate emergency SAR responses for all aeronautical and maritime incidents for the entire country. In addition, as a secondary role, the JRCCs also coordinate requests from

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other levels of government for the use of federal SAR resources. These requests are commonly made for humanitarian events that fall within provincial or municipal GSAR jurisdictions.

The JRCCs and MRSCs are staffed by Royal Canadian Air Force (RCAF) and CCG personnel, who annually manage some 9,000 distress cases through an internationally agreed Canadian SAR area of responsibility (AOR). This AOR ranges from the North Pole to the US border and stretches some 600 miles offshore of Vancouver Island eastward to halfway across the Atlantic Ocean. Many SAR cases are maritime in nature, requiring exceptionally rapid incident location and response, owing to extremely short survival times in the cold oceanic waters surrounding Canada and on the Great Lakes/St. Lawrence Seaway. Aeronautical cases can also be challenging due to the remote and sparsely settled nature of Canada and long distances travelled by aircraft, resulting in large search areas when an incident location is unknown.

Secondary PSAP Status for JRCCs and MRSCs

Since the creation of the 9-1-1 emergency system, federal aeronautical and maritime SAR services have not been included as a first response agency or designated as a PSAP, despite the fact we respond with and/or at the request of local first responders (normally a police PSAP request). As a result, JRCCs and MRSCs have been routinely reliant on provincial, territorial, or municipal PSAPs to relay critical distress notification. Lacking the status of either primary or secondary PSAPs, the federal centres are not automatic recipients of caller identification and location information and therefore must verbally request this information from police agencies, which delays precious response time.

JRCCs and MRSCs are secondary PSAPs in all but name; they receive distress calls from both the general public and other PSAPs and then dispatch and coordinate appropriate federal emergency responders and resources. They are unique in that their responsibilities for coordinating and providing emergency services cover jurisdictions across Canada. They also span the full spectrum of SAR response from aeronautical, to maritime or humanitarian. While other PSAPs are established, designated and managed by the appropriate provincial and territorial government, there does not exist a clearly established mechanism or authority to provide the same fundamental designation for the federal level JRCCs and MRSCs. As such they have not been able to fully integrate within existing 9-1-1 services or easily leverage time critical information such as automatic number identification (ANI) and automatic location identification (ALI), which are available for other PSAPs.

Telecom Regulatory Policy CRTC 2017-182 established the importance of modernizing the current 9-1-1 networks to meet the public safety needs of Canadians, along with the need for effective and timely access to emergency services. As the implementation of Next Generation 9-1-1 (NG9-1-1) capabilities progresses across the country, it is imperative that the federal level JRCCs and MRSCs be better integrated within the larger framework of 9-1-1 services for Canadians to ensure those established needs are met.

As per Telecom Regulatory Policy CRTC 2017-182 and Telecom Decision CRTC 2018-188, a secondary PSAPs designation will ensure that respective incumbent local exchange carriers (ILECs) will have the authority to provide JRCCs and MRSCs end-user and wholesale access to NG9-1-1 networks in their operating territories. All costs incurred and responsibilities

associated with NG9-1-1 interconnectivity beyond the demarcation points for all JRCCs and MRSCs would remain the responsibility of the CAF and the CCG.

Conclusion

There is a direct link to the services that the jointly operated CAF and CCG JRCCs and MRSCs provide and those provided by provincial, territorial, or municipal emergency service counterparts. In fact there is often overlap, highlighting a need for better integration into existing and future 9-1-1 services in Canada. Currently, there is no clearly identified federal 9-1-1 legislative governance authority that is empowered to identify the JRCCs and MRSCs as either primary or secondary public service access points. As such, it is requested that the CRTC provide secondary PSAP designation to the three JRCCS, two MRSCs and associated backup facilities. If unwilling to provide the requested designation, it is further requested that the CRTC identify a suitable authority, or an alternative mechanism to facilitate the electronic delivery of emergency information from PSAPs that request our services.

Access to emergency services is critical to the health and safety of all Canadians. Designating the federal Joint Rescue Coordination Centres and Maritime Rescue Sub-Centres as Secondary PSAPs will help ensure that all Canadians have modernised and equal access to not just ground based emergency responders, but also to those providing maritime and aeronautical response. This will enable federal SAR missions to be delivered as efficiently as possible, ultimately saving lives. The staff points of contact for this matter are:

- RCAF HQ: Maj William Livingston, Air Rdns SAR 3-3, William.livingston@forces.gc.ca, (613) 901-2754
- CJOC: LCol James Marshall, J3 SAR, James.Marshall@forces.gc.ca, (613) 945-2256
- CCG: Ms. Beth Fraser, A/Manager SAR Operations, Elisabeth.Fraser@dfo-mpo.gc.ca, (613) 402-8597

Sincerely,

I.S. (Iain) Huddleston
Major General
CJOC Chief of Staff

C.E.L. (Chris) Henderson
Deputy Commissioner of
Operations CCG