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**CRTC INTERCONNECTION STEERING COMMITTEE (CISC)**

**REPORT to the CRTC**

**by the**

**Emergency Services Working Group (ESWG)**

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**Report Number: ESRE0095**

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**Proposed Changes to Dates and Direction in  
Telecom Decision CRTC 2021-210**

**February 10, 2022**

**Version: 1.0**

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## 1 BACKGROUND AND INTRODUCTION

On 23 June 2021 Telecom Decision [CRTC 2021-210](#) re handset-based location implementation was issued with directions based on recommendations from the CISC Emergency Services Working Group (ESWG) report [ESRE0092](#). This ESWG report was submitted on 15 October 2020 after extensive work with industry partners, and prior to the new NG9-1-1 implementation dates which were announced in Telecom Decision [CRTC 2021-199](#) issued on 14 June 2021.

The ESWG task group that filed report ESRE0092 immediately recognized that the direction provided at paragraph 43 of [TD 2021-210](#) was almost identical to the timing directed for implementation of NG9-1-1 voice in [TD 2021-199](#). As well, during follow-up on the date conflict issue, the ESWG task group also identified new information that impacts the direction at paragraph 44(1) regarding WSPs (Wireless Service Providers) entering an “agreement with Google”. As such, after considerable follow-up with the handset-based location stakeholders and CRTC staff, the ESWG submitted a letter request to the CRTC on 29 September 2021 requesting approval to suspend all deadlines imposed as part of TD 2021-210. The reasons for this request were as follows:

- a. *When ESWG proposed the original 1 March 2022 due date in ESRE0092 for the implementation of new handset-based location protocol, it assumed that the NG9-1-1 Voice implementation date would be finalized as the then-preliminary date of 31 March 2021. Unfortunately the date for NG9-1-1 Voice implementation and Handset-based location implementation are now the same i.e. 1 March 2022. We recognize that the same limited resources, from both WSPs and NG9-1-1 network providers, are responsible for both implementations. Given the tremendous amount of work conducted to date and the scope of its application, the NG9-1-1 Voice implementation must happen first. Consequently, we are requesting a suspension of the dates directed in TD 2021-210. The ESWG flagged these issues with Commission staff and the applicable ESWG stakeholders shortly after the decision was issued and have been very busy working on the logistics to move forward.*
- b. *When report ESRE0092 was originally submitted, we knew that Google had already signed agreements with the proof-of-concept WSPs to undertake the preliminary work that we reported on. When this decision was issued, Google flagged the fact that they only execute agreements with the Aggregators. Per the report, the proposed Aggregators (subject to confirmation during the matters for further consideration) are the NG9-1-1 network providers. Based on this new information, we will be requesting a change in the entities that execute the agreement with Google in our follow-up report.*

ESWG committed to providing a follow-up report recommending new timelines, and additional amendments as warranted, by 11 February 2022.

## 2 PROPOSED CHANGE OF DATES

Based on extensive ongoing work since September 2021, ESWG has developed a detailed Proof of Concept (POC) working spreadsheet in order to inform and guide our next steps. The result of this work is a proposal to move forward with the following high level POC deliverables:

- a. Determine if the Apple handset location validation process is required – 6 April 2022 to 4 May 2022
- b. Execute the Apple and Google Proof of Concept activities – 7 June 2022 to 10 August 2022
- c. File a follow-up report to finalize the configuration requirements for Apple and Google handset-based location in Canada – 13 October 2022

**As a result, the ESWG is recommending that the Canadian handset-based location implementation date continue to be suspended until the Proof of Concept is completed in August 2022; thereafter, the ESWG will include a recommended implementation date in the 13 October 2022 follow-up report.**

It is important to note that there are certain activities i.e. Google aggregation logistics, and software/hardware for the WSP location platforms, that are out of the control of the WSPs, and NG9-1-1 network providers. Therefore, the proposed dates are a best effort, with our continued goal of a 2023 implementation of handset-based location in Canada.

## 3 FOLLOW-UP ON THE DIRECTION PROVIDED BY THE CRTC

As detailed in the ESWG letter to the CRTC filed on 29 September 2021: shortly after Telecom Decision [CRTC 2021-210](#) was released, our task group (ESTF0069) identified a new issue with the direction provided at paragraph 44(1) for WSPs to sign an agreement with Google. Google representatives advised they only sign agreements with the entities (aka Aggregators) they send the handset location data to in Canada. As detailed in our report ESRE0092, the proposed Canadian Aggregators, subject to completion of the Proof of Concept (see section 2 above for details), are Bell and TELUS. **As a result, the ESWG is recommending the direction detailed in paragraph 44, which is applicable to both the Aggregators and WSPs, be suspended until ESWG files a final follow-up report on 13 October 2022, which will detail the proposed obligations for all applicable stakeholders.**

**In addition, the ESWG is recommending that the question whether Saskatchewan Telecommunications will or will not be a third Canadian Aggregator be addressed in the pending 13 October 2022 final follow-up report.**

## 4 NEW CONSIDERATIONS FOR BASELINE CELL DATA ACCURACY

Since the CRTC decision 2021-210, the ESWG task group (ESTF0069) has created a Proof of Concept (POC) sub-group to develop a comprehensive list of activities and timelines to move forward as detailed above. One of the key follow-up items relates to a concern flagged by Apple during the proposed validation process, where a good locate could be dropped due to an improperly configured cell site. The ESWG has determined that this same issue can impact Wireless Phase II location calculations. Further investigation is required before we can report the specifics of this issue. **As such, the ESWG is proposing a new Matter for Further Consideration –To Determine if a Baseline Cell Data Accuracy Criteria is Required for Canada?** This item will be addressed in the pending 13 October 2022 final follow-up report.

## 5 CONCLUSION

As the CRTC is aware, the ESWG has been working several years on the logistics to implement handset-based location in Canada. These very recent developments have ultimately resulted in a delay, however for the reasons noted, it is required to ensure that we get the implementation right for Canada.

## 6 RECOMMENDATIONS

Based on the reasoning detailed in this report, the ESWG has the following recommendations:

1. That the Canadian handset-based location implementation date continues to be suspended until the Proof of Concept is completed in August 2022; thereafter the ESWG will file a final follow-up report by 13 October 2022 with a newly proposed implementation date.
2. The direction detailed in paragraph 44 of TD CRTC 2021-210, which is applicable to both the Aggregators and WSPs, be suspended until ESWG files a final follow-up report on 13 October 2022, which will detail the proposed obligations for all applicable stakeholders.
3. That the question whether Saskatchewan Telecommunications will or will not be a third Canadian Aggregator be addressed in the pending 13 October 2022 final follow-up report.

## **7 MATTERS FOR FURTHER CONSIDERATION**

Based on the reasoning detailed in this report, the ESWG has the following new matter for further consideration:

1. To determine if a baseline cell data accuracy criteria is required for Canada, and report details in the pending 13 October 2022 final follow-up report.

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