



September 6, 2023

Ref: 120617

Claude Doucet
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, ON K1A 0N2
Via email: Claude.Doucet@crtc.gc.ca

Dear Claude Doucet:

RE: Part One Application by the representatives of the Government of the Province of British Columbia to the CRTC for the provision of pre-production NG911 test systems that mirror the production NG911 systems for the purposes of system change management inclusive of a comprehensive quality assurance program.

Introduction

1. The Government of British Columbia (BC Government) wishes to contribute to the discussion about the requirements to establish proper testing environments for implementation and post-implementation of the NG911 system and services.
2. Although the role of the BC Government is limited in the implementation and operation of 911 services, it is our responsibility to ensure that services linked to emergency management and public safety response are of the highest quality, available all the time, and adhere to well-known and proven practices of deployment and operation of Information Technology and Telecommunication infrastructures.
3. We are looking with extreme concern at the fact that providers of network services argue that these practices will not be followed for NG911 systems and that all implementation, testing and changes in operations will be deployed in live (production) systems.
4. Considering that these IT and Telecommunications components are supporting critical services that will affect the lives of millions of citizens in the province, it is in our best interest to submit this position paper with arguments about the requirements needed to support a proper NG911 testing system.

Considerations

5. NG911 systems are highly complex. As opposed to the "traditional" 911 and even E911 systems, NG911 is comprised of many layers of interconnected components ranging from physical devices to highly sophisticated purpose-build applications.
6. NG911 systems are new, and they have been implemented in a few locations across North America. As opposed to traditional 911 systems that have been around for decades, we are facing new technology deployed in critical areas of public service.

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7. NG911 systems will evolve quickly. As opposed to legacy systems installed and operated for decades with minimal changes, it is expected that technologies linked to NG911 will go through faster development and enhancement lifecycles, creating the need for more continuous updates.
8. The NG911 ecosystem is complex. There is a high number of operational entities and software/hardware providers throughout the call path from end user through first responders.
9. In such a complex environment both safely deploying upgrades and troubleshooting issues are going to be equally complex, potentially requiring multiple providers working together with access to end-to-end testing facilities.
10. It is our understanding that there is no mandate in legislation or regulation supporting the need to have testing environment(s) associated with "standard NG911 systems deployment." This has been portrayed by the NG911 operators in BC as a high exposure risk, both for deployment and operation of the system.
11. Service providers like Telus and Bell have been clear to point out that since there is no mandatory requirement to set up test environments for deployment and operation of NG911 systems, they will not be standing up those environments. The practical implication is that every deployment, change, troubleshooting, update, etc. of key components of NG911 will be performed on live production systems.
12. The BC Government considers this risk an unacceptable (and unmitigable) risk, affecting the security and lives of our citizens.

BC Government Position

13. That CRCT amends the conditions and requirements of services providers under federal regulations to mandate the implementation of test(s) environments for NG911 systems and services.
14. That CRTC allows service providers under federal regulation to amend the tariffs to account for these new requirements.
15. That CRTC, through its working groups, establishes technical documents supporting actions needed to reflect standard practices in the IT and Telecommunications industries in the NG911 systems and services for deployment and operations.

Sincerely,



Ivan Rincon
Executive Director, Project Management

pc: CRTC Regulatory Affairs
demandegec-gicpetition@crtc.gc.ca