



Telecom Decision CRTC 2004-71

Ottawa, 5 November 2004

Assignment of 311 for non-emergency municipal government services

Reference: 8665-C126-200315699

*In this decision, the Commission disposes of a joint application from the City of Calgary, the City of Toronto, Halifax Regional Municipality, the Regional Municipality of Halton, la Ville de Gatineau and la Ville de Montréal (collectively, the Municipalities). The Commission **approves** the assignment of an N11 code, specifically 311, for access to non-emergency municipal government services. The Commission directs the telecommunications service providers (TSPs) to assume, on an incremental basis, the costs of the basic switch modifications and network changes necessary for the implementation of 311 service. The Commission determines that call routing arrangements should be based on the exchange boundaries, unless otherwise negotiated by the municipality and the TSPs operating in that area. The Commission determines that if special routing arrangements are made, upon a municipality's request, the TSPs should not bear the cost of provisioning such arrangements. The Commission further determines that 9-1-1 service and 311 service shall not be integrated. The Commission expects the Municipalities to fulfill their commitment to undertake comprehensive and effective public awareness campaigns.*

The application

1. On 31 October 2003, five municipalities filed an application, pursuant to part VII of the *CRTC Telecommunications Rules of Procedure*, requesting that the three-digit code 311 be assigned for telephone access to non-emergency municipal government services. By letter dated 14 November 2003, la Ville de Montréal informed the Commission that it would also be participating in the application. Subsequently, the joint applicants included the City of Calgary, the City of Toronto, Halifax Regional Municipality, Regional Municipality of Halton, la Ville de Gatineau and la Ville de Montréal (collectively, the Municipalities).
2. Specifically, the Municipalities requested that:
 - the right to use 311 be afforded to any municipality¹ in Canada, based on each municipality's readiness;
 - 311 be restricted to access to non-emergency municipal government services; and
 - all telecommunications service providers (TSPs) be required to route 311 calls.

¹ The applicants stated that a "municipality" shall be understood to refer broadly to all Canadian municipalities having the jurisdiction to deliver non-emergency municipal services, including local, regional, district, and metropolitan levels of municipal government.

3. The Municipalities provided examples of the various functions of the proposed 311 service. Citizens could dial 311 to report dangerous road conditions (i.e. potholes, missing manhole covers), traffic light / street light outages, water main breaks, blocked / broken sewer mains, stray animals, abandoned vehicles, and noise complaints. Further, citizens could make inquiries regarding garbage / recycling, water quality / safety, public transit schedules, development and building permits, property tax bills, parking tickets, and recreation facility schedules. The proposed 311 service could also provide referrals to the mayor's / aldermen's offices, handle general service complaints and compliments, and provide access to all police / fire non-emergency services.

Process

4. On 12 January 2004, the Commission received comments from Bell Canada, MTS Communications Inc. and Saskatchewan Telecommunications (collectively, the Companies), TELUS Communications Inc., TELUS Communications (Québec) Inc. and TELE-MOBILE Company (collectively, TELUS), Aliant Telecom Inc. (Aliant Telecom), Bragg Communications Inc. (doing business as EastLink) and the Canadian Wireless Telecommunications Association (CWTA).
5. Allstream Corp. (Allstream) filed comments with the Commission on 15 January 2004.
6. The Ontario Telecommunications Association (OTA) filed comments with the Commission on 20 January 2004.
7. On 30 January 2004, the Municipalities submitted reply comments.
8. The Commission received letters of support for the application from a number of entities including: the Alberta Urban Municipalities Association, the Association of Municipalities of Ontario, the Canadian Association of Chiefs of Police, the Canadian Association of Fire Chiefs, the City of Brampton, the City of Hamilton, the City of Richmond, the City of Windsor, the City of Winnipeg, Community Information Toronto, the Distress Centre / Drug Centre (Calgary), the Federation of Canadian Municipalities, the Halifax Regional Fire and Emergency Service, the Halifax Regional Police, Ms. Diana Hooper, l'Union des Municipalités du Québec, the Union of Nova Scotia Municipalities, the United Way of Canada, the United Way of Halifax Region and the United Way of Greater Toronto (UWGT).

Background

9. Within the North American Numbering Plan (NANP), which provides the framework for a continent-wide telephone number system, unique three-digit (N11) codes² are assigned as an industry standard to provide abbreviated access to specific types of services. In Canada, N11 codes have been assigned as follows:
 - 211 for public information and referral services;

² 011 and 111 are not included as these are used for switching and routing toll and international calls.

- 411 for local directory assistance;
 - 511 held in reserve for access to Message Relay Services (MRS) by hearing persons;
 - 611 for repair service;
 - 711 for MRS for the hearing impaired;
 - 811 for TSPs' business offices; and
 - 9-1-1 for emergency services.
10. Consequently, 311 is the only N11 code currently available for assignment in Canada.
11. In *Allocation of three-digit dialing for public information and referral services*, Decision CRTC 2001-475, 9 August 2001 (Decision 2001-475), in view of the scarcity of N11 codes, the Commission established the following guidelines to be used when considering the assignment of unused N11 codes:
- i) there must be a compelling need for three-digit access that cannot be satisfied by other dialing arrangements or it is demonstrated that existing dialing arrangements are not suitable for accessing the needed services;
 - ii) the assignment of an unused N11 code should be to a service or services rather than a specific organization;
 - iii) the provision of N11 dialing is to be based on a need to serve the broad public interest, including providing access to the telephone network to disadvantaged individuals or groups;
 - iv) the N11 dialing should not confer a competitive advantage on the service provider(s) reached by this number;
 - v) the services to be provided through N11 dialing are to be widely available geographically and on a full-time or extended-time basis; and
 - vi) where possible, the N11 allocation to a service does not conflict with the NANP and is in keeping with the Canadian Steering Committee on Numbering (CSCN) guidelines for N11.

Issues

12. The Commission recognizes four main issues related to the Municipalities' application. In this decision, the Commission considers:
- a) whether or not the application meets the Commission's guidelines established in Decision 2001-475;

- b) implementation strategies and cost recovery;
- c) potential for integration of the 311 and the 9-1-1 systems; and
- d) the need for public awareness campaigns.

a) Commission guidelines for assigning N11 codes

Position of parties

The Municipalities

13. The Municipalities submitted that the assignment of 311 for non-emergency municipal government services meets the six guidelines established in Decision 2001-475.

i) compelling need for N11 access or existing dialing arrangements are not suitable

14. The Municipalities stated that municipal governments were closest to citizens and provided services that impact day-to-day living, and that citizens expected and demanded value for their tax dollars. They submitted that consolidation of telephone services would help municipalities to do more with less, enabling improved effectiveness and accountability.
15. The Municipalities stated that with the growth of urban centers, there was a larger demand for municipal services, resulting in municipalities moving towards coordinated service strategies. The Municipalities noted that several municipalities had moved towards centralizing their response activities with more easily recalled telephone numbers, such as NXX-CITY.
16. The Municipalities maintained that the ease of use of a seven-digit centralized number was diminishing with the move to 10-digit local dialing and the introduction of multiple area codes in larger municipalities and regions. They pointed out that almost half of the area codes in Canada were under area code relief planning, that three of the six largest cities in Canada, namely Toronto, Montreal and Vancouver, had or would soon have 10-digit local dialing, and that Toronto already had multiple area codes. The Municipalities submitted that the need for easier access for non-emergency municipal service was essential, especially to prevent further misuse of 9-1-1 as a central access point.
17. The Municipalities submitted that the use of a seven-digit or 10-digit number assumed that citizens were knowledgeable about local municipal structure, that they used the government pages in the telephone directory (blue pages) and that the blue pages were user-friendly and current. However, the Municipalities stated that these assumptions were not correct, submitting, for example, that, on average, 50 percent of the calls that the City of Calgary received were misdirected.
18. The Municipalities submitted that ease of access was especially important for citizens facing barriers to access, including age, physical challenges, language and literacy.

19. The Municipalities indicated that a non-emergency call for municipal services did not require an instant response, but that an emergency situation could develop if service requests were not resolved in a timely and effective manner.
20. The Municipalities submitted that municipal services played a critical front-line role during disasters, and specifically noted the July 2003 power outage in Ontario and New York, Hurricane Juan in Halifax, the SARS outbreak in Ontario and forest fires in British Columbia and Alberta. The Municipalities noted that in these types of situations, the 311 service would help prevent unnecessary calls to 9-1-1, at precisely the time when 9-1-1 was needed the most.

ii) N11 code should be assigned to a service, rather than an organization

21. The Municipalities confirmed that the application was for the assignment of 311 for access to non-emergency municipal government services, and not for a specific organization.

iii) N11 service should serve the broad public interest

22. The Municipalities submitted that 311 service would facilitate access for the nearly 80 percent of Canadians who live in urban centres. The Municipalities considered that 311 would support a diverse population including older adults, children and youth, the homeless, persons with disabilities, individuals who are illiterate, and those whose first language is neither English nor French.
23. The Municipalities further submitted that simplifying access to non-emergency municipal government services would help to reduce public frustration, avoid the costs related to unattended civic problems, and reduce inappropriate calls to 9-1-1 systems.
24. The Municipalities pointed out that in 1997, the Federal Communications Commission ordered the assignment of 311 to non-emergency police and other municipal government services, to help relieve congestion of 9-1-1 emergency systems. They noted that in Baltimore, Maryland, calls to 9-1-1 were reduced by 42 percent within the first 2 months of implementing 311.

iv) N11 service should not confer a competitive advantage on any service provider(s)

25. The Municipalities stated that 311 service would be a municipal service, which is not commercial in nature, and that there was no competitive advantage to the service providers.

v) N11 service should be widely available on a full-time or extended-time basis

26. The Municipalities proposed that 311 be implemented by municipalities according to the needs of their particular geographical area and consumer demands. The Municipalities anticipated that the service would operate during full-time business hours in all centres, and on an extended-time basis in larger centres. They stated that their end-goal was accessibility 24 hours per day and seven days per week.

vi) N11 allocation should not conflict with the NANP and should be in keeping with CSCN guidelines

27. The Municipalities maintained that the assignment of 311 for non-emergency municipal government services would maintain the integrity of the NANP and that it was in line with the CSCN guidelines.

Other parties

28. The Companies submitted that the request for 311 appeared to satisfy the guidelines established by the Commission in Decision 2001-475. Aliant Telecom concurred with the Companies' submission regarding conformity to these guidelines. Allstream and the OTA did not object to the Municipalities' proposal.
29. Those parties who submitted letters of support for the Municipalities' application presented many common arguments in favour of assigning the 311 code to non-emergency municipal government services. They stated, among other things, that 311 service would facilitate ease of access for citizens, help municipalities make their services more effective and convenient, and reduce the number of emergency calls to 9-1-1.
30. TELUS submitted that the Municipalities had demonstrated that there was a benefit to an easy-to-use dialing arrangement for access to non-emergency municipal government services, but that it was not clear that they required the use of a scarce resource such as an N11 code. TELUS suggested that many of the benefits of an N11 code could be met by aggregating municipal services through an efficient call centre using a common seven-digit telephone number, pointing out that some municipalities had already done so. TELUS noted that if 311 was allocated to municipal services, then any future national services that would serve the public interest would need to be accommodated using a different dialing arrangement.
31. EastLink submitted that Decision 2001-475 suggested that 211 was intended, in part, for municipal services. EastLink noted that according to Decision 2001-475, the Commission noted that the City of Calgary stated that "...as 211 consolidates access, effective channels will be required to link 211 and various municipal services." EastLink submitted that, given the scarcity of N11 codes, the intended purpose of 211 should be reviewed to determine whether municipal services could be accessed through 211.
32. CWTA stated that it was not entirely convinced of the merits of the application when measured against recommendations submitted by CWTA in the proceeding leading to Decision 2001-475. In that proceeding, CWTA suggested that there should be "demonstrated persuasive rationale, such as urgency or avoidance of confusion" to justify the assignment of an N11 code.

The Municipalities' reply comments

33. In response to CWTA's comments regarding a "demonstrated persuasive rationale, such as urgency or avoidance of confusion" for assignment of an N11 code, the Municipalities noted that the Commission did not adopt CWTA's recommendation when it established the guidelines

in Decision 2001-475. Rather, the Commission required applicants to demonstrate a compelling need for three-digit access. The Municipalities argued that such a need clearly existed, as demonstrated in their application.

34. The Municipalities asserted that the Commission's consideration of their application should not be affected by TELUS's claims that 311 was the last N11 code and therefore a scarce resource. The Municipalities argued that any analysis based on a 'first come, first served' approach would render the Commission's N11 guidelines irrelevant. The Municipalities submitted that the use of 311 for access to non-emergency municipal government services was at least as good as, if not better than, the current assignment of 511, 611, and 811 numbers.
35. In response to EastLink's suggestion that 211 was intended, in part, for provision of municipal services, the Municipalities contended that the types of services provided through 211 were different from the subject of their 311 proposal. The Municipalities stated that the 211 service was intended as an information and referral service for community, social, health, and government services, while 311 would be a tool for the efficient and effective delivery of non-emergency municipal government 'hard' services such as potable water, sanitary storm sewers, roads and traffic lights, and recreation activities. The Municipalities emphasized that the City of Toronto, which currently has 211 service, supported the establishment of 311 service.

Commission's analysis and determination

36. The Commission notes the Municipalities' arguments regarding the need for easy access to essential services, especially as 10-digit local dialing and multiple area codes have been imposed in a number of urban centres. The Commission considers that an N11 code would help to facilitate effective and efficient communication between municipal governments and their citizens.
37. The Commission notes that although certain TSPs expressed some doubt as to whether a compelling need existed, none were strongly opposed to the assignment of 311 for non-emergency municipal government services.
38. With respect to EastLink's view that municipal services could be accessed through 211, the Commission considers that the services provided through 211 service are substantially different in nature than those that the Municipalities proposed to offer through 311 service. The Commission notes that the original proponents of 211, including the United Way of Canada – Centraide Canada, welcome the implementation of 311 and are prepared to work with municipalities to ensure effective and efficient service. The Commission is of the view that the 211 and 311 services would complement each other effectively, but that the two services would be distinct in nature. Therefore, the Commission considers that the existence of 211 service does not lessen the need for the proposed 311 service.
39. With respect to TELUS's suggestion that municipalities could aggregate services through an efficient call centre using a common seven-digit number, the Commission considers that this solution would be less than effective in areas with 10-digit local dialing and multiple area codes.

40. Given the growing demand for municipal services and given the fact that existing dialing arrangements are becoming increasingly complex for consumers, the Commission is of the view that a compelling need does exist for N11 access to non-emergency municipal government services.
41. With respect to serving the broad public interest, the Commission considers that an easily remembered three-digit number would greatly assist the public in accessing municipal services. The Commission further considers that with the expansion of 10-digit local dialing and with nearly 80 percent of Canadians living in urban centres, easy access to municipal services becomes increasingly valuable, particularly for certain segments of the population, including the elderly and persons with disabilities.
42. Further, the Commission recognizes the Municipalities' concern regarding their citizens' frustration in trying to locate the appropriate telephone number for municipal services, and notes that the blue pages may not be useful if callers are unfamiliar with the structure of the municipal governments. The Commission considers that access via a 311 code would reduce the number of times that callers are transferred between departments and should provide municipalities with a more efficient and effective means of serving the public.
43. The Commission also notes the many benefits, including a significant reduction in non-emergency calls to 9-1-1, that have been realized in the U.S. cities in which 311 service has been implemented. The Commission considers it to be in the broad public interest to relieve the stress on the 9-1-1 system and ensure its availability for actual emergencies.
44. Finally, the Commission notes the numerous submissions from groups across the country, including those from police and fire services, and considers these to be an indication of substantial public support for the Municipalities' application.
45. In light of the above, the Commission considers that the Municipalities have demonstrated that the assignment of an N11 code for access to non-emergency municipal government services would serve the broad public interest.
46. With respect to the other guidelines, the Commission notes that the assignment of 311 would be to a service (access to municipal services), not an organization, that it would not confer a competitive advantage on any service provider(s), and that the service would be widely available geographically on an extended-time, if not full-time, basis. The Commission considers that such an assignment would not conflict with the NANP or the CSCN guidelines³.
47. The Commission considers that the Municipalities have demonstrated that an N11 code is warranted for non-emergency municipal government services and that their application meets each of the guidelines established by the Commission in Decision 2001-475. Accordingly, the Commission **approves** the assignment of 311 for access to non-emergency municipal government services.

³ The CSCN guidelines state that the application of N11 should be uniform and consistent throughout the NANP area to the maximum extent practical. In addition, the unassigned N11 codes should be designated primarily for basic, or adjunct-to-basic, telecommunications services of a universal social value rather than for commercial use by certain industry segments.

b) Implementation strategies and cost recovery

Position of parties

The Municipalities

48. The Municipalities submitted that the technology and industry requirements for the implementation of 311 service mirrored those for the implementation of 211 service and anticipated that they would draw on the experience of implementing 311 and 211 in the U.S. and 211 in Canada. The Municipalities stated that implementation strategies may vary by location and that flexibility is required to allow 311 system operators to research and respond to local needs. The Municipalities further proposed that funding arrangements be flexible to allow for the use of various funding sources. The Municipalities stated that they would share both technical and consumer information through organizations such as the Federation of Canadian Municipalities.
49. The Municipalities proposed that each TSP route 311 calls to a seven or 10-digit number by reprogramming its switches, within three months of receiving notification that 311 service was to be introduced. They anticipated that informal discussions with the TSP would begin well in advance of the formal three-month period. The Municipalities submitted that this timeline would allow the TSPs to schedule the work in conjunction with other routine maintenance and service work.
50. The Municipalities provided a list of guidelines for each municipality to consider in determining if it was ready for implementation of 311 service. These guidelines related to call centre management, scope of service, service standard targets, protocol for interaction with 9-1-1 and 211, linkage to a disaster preparedness plan, and a phase-in strategy.
51. The Municipalities proposed that costs for implementation of 311 service be borne by the TSPs, as the Commission directed in Decision 2001-475 for 211 implementation. They anticipated that, as in the case of 211 implementation, these costs would not be significant.
52. The Municipalities proposed that long distance costs should be negotiated between the 311 system provider and the TSPs, and paid for by the system provider and / or the caller. They indicated that municipalities may consider establishing a 1-800 number, in order for the system providers to bear the cost of long distance calls. With respect to wireless calls, the Municipalities submitted that costs would be recovered through charges to the caller.

Other parties

53. TELUS recommended that call routing follow the standard routing for a 10-digit call. TELUS also stated that if the Commission approved 311 dialing, calls should be routed to a designated single point of answer based on the incumbent local exchange carrier (ILEC) exchange boundary for wireline customers and based on the wireless provider's local calling area for wireless calls. TELUS suggested that call routing issues should be discussed and coordinated among all TSPs operating within the area where 311 service was to be implemented, and that if there were more than one municipality within an exchange or local calling area, the affected municipalities should agree on how services would be provided before initiating discussions

with the TSPs. TELUS recommended that the Commission approve a 'single point of answer' rule, which would require this co-ordination between municipalities within an exchange or local calling area. The OTA, whose members typically serve areas that encompass or overlap multiple municipalities, expressed similar concerns regarding implementation of 311 in exchanges with two or more municipalities. OTA supported TELUS's proposal for a 'single point of answer' rule.

54. TELUS stated that the costs of enabling 311 service could be significant and would qualify as an unanticipated expense. TELUS therefore recommended that the upfront and ongoing costs of implementation should be borne by the municipality. TELUS added that if the Commission agreed with the Municipalities' view that no additional charges should be levied against the 311 provider for incoming local calls, this would constitute an exogenous adjustment under the price cap regulation regime.
55. With respect to implementation timing, TELUS submitted that the requirements of each municipality may differ substantially and that formal negotiations with government agencies may prevent TSPs from respecting a pre-determined implementation timeframe. TELUS proposed that the timeframe be negotiated by each municipality and the TSPs operating in the area.
56. TELUS further submitted that services available through 311 dialing should be as homogenous as possible throughout the country, in order to reduce confusion about the use of 311 service. TELUS also suggested that services available through 311 dialing should continue to be available through existing seven and 10-digit access arrangements for customers who were accustomed to the seven or 10-digit dialing or unaware of 311 access.
57. TELUS suggested that any technical issues that could not be resolved between parties may be referred to the CRTC Interconnection Steering Committee (CISC).
58. The Companies noted that, in some cases, an exchange area may serve parts of several municipalities and that telecommunications networks generally were not provisioned to route calls based on municipal boundaries. The Companies stated that special provisioning measures would be required to ensure the routing of calls to the appropriate 311 call centre and that it was not reasonable to expect that negotiations, network modifications, and system testing could be completed within the proposed three-month timeframe. The Companies, like TELUS, proposed that implementation dates be negotiated by the municipality and the TSPs operating in that area.
59. The Companies submitted that routing calls based on municipal boundaries may add significantly to the costs of implementing 311, due to the special provisioning measures for identifying the 311 call centre associated with each end-user's call. In order to minimize costs, the Companies proposed that call routing be based strictly on the exchange boundaries for wireline TSPs and service boundaries proposed by the wireless service providers (WSPs). They stated their expectation that when a 311 call centre was outside the end-user's local calling area, calls would be routed and rated as toll calls. The Companies submitted that negotiations between the TSPs and the municipalities would be necessary to determine the appropriate routing and related matters and to ensure the identification and recovery of associated costs.

60. The Companies stated that the provision of 311 dialing access would be significantly more expensive for credit card, third-party billing, collect calls, casual calling, and operator assisted calling. The Companies and TELUS proposed that there be no regulatory requirement to provide routing for such calls, in order to minimize implementation costs.
61. TELUS recommended that access to 311 service from payphones be provided using cash or prepaid calling cards, but added that it would be prepared to enable other billing options for calls provided it was compensated for its costs. The Companies expressed a similar view, stating that additional payphone billing options could cause them to incur significant additional costs for billing modifications and should only be implemented subject to a business arrangement between the 311 service provider and the payphone provider.
62. With respect to long distance calls, TELUS recommended that costs be recovered directly from the municipality and not from the end-user. Both TELUS and the Companies suggested the use of a toll-free number to which the 311 dialed numbers would be translated for routing purposes, so that the municipalities would be billed.
63. EastLink accepted the Municipalities' suggestion that TSPs would be responsible for the cost associated with the switching translations required to route 311 calls, but stated that any other costs should be borne by the 311 service provider.
64. EastLink submitted that if an agreement was required for the implementation of 311 service, such an agreement should be developed as an industry standard to ensure consistency in terms and conditions for all carriers, including payment provisions. EastLink further submitted that this would minimize the need for negotiations.
65. The Companies maintained that municipalities should be responsible for the implementation costs of 311, but stated that as the service would benefit the public at large, the Companies would not be opposed to recovering their costs through their respective deferral accounts, where feasible.
66. Aliant Telecom submitted that costs associated with 311 implementation should not be recovered from the deferral account, but from the parties on whose behalf those costs were incurred.
67. Allstream also opposed the use of the ILECs' deferral accounts to recover implementation costs, stating that all TSPs (i.e. competitive local exchange carriers, ILECs and WSPs) would incur costs to implement 311, that these costs were not significant, and that the deferral account was not intended to defray normal operating costs for the ILECs. Allstream stated that there was a precedent for the treatment of costs for N11 codes, noting that in Decision 2001-475, the Commission determined that TSPs should bear the incremental costs of N11 implementation. In Allstream's view, there was no reason to accord different treatment for the recovery of costs associated with 311 service than was accorded in the implementation of 211 service.
68. The CWTA expressed concerns regarding the Municipalities' suggestion that TSPs bear the implementation costs on an incremental basis, as they did for the implementation of 211 service. The CWTA pointed out that a municipality electing to provide simplified dialing was different from a charitable organization wanting to do the same. The CWTA

therefore submitted that TSPs should have the right to recover all costs associated with the implementation of 311 service. The CWTA supported the Municipalities' proposal that WSPs would charge regular rates for 311 calls.

69. The OTA submitted that since 311 would assist municipalities in reducing their costs and improving their services, all implementation and ongoing operating costs associated with 311 service should be fully borne by the municipality.

The Municipalities' reply comments

70. The Municipalities disagreed with the TSPs' proposal that the timeframe for 311 implementation be negotiated between the municipalities and TSPs on an individual basis. The Municipalities were of the view that a defined timeframe would facilitate implementation in a timely manner, and was necessary given the resources, expense, and effort required for implementation. They emphasized that a defined timeframe was an important part of any public awareness campaign. However, the Municipalities recognized the TSPs' concerns regarding the proposed three-month timeframe, and submitted that they were agreeable to an extended period, not to exceed six months, if this would ease the TSPs' implementation costs. They also reiterated the fact that they expected informal discussion between the municipalities and the TSPs to begin well before formal notice would be given.
71. With respect to TELUS's recommendation of a 'single point of answer' rule, the Municipalities stated that 311 calling boundaries must correspond to municipal boundaries, rather than local exchange boundaries. They submitted that the boundary issue was fundamental to the definition of the proposed service and that the implementation of 311 would be adversely affected if municipalities were forced into shared cost / service delivery arrangements.
72. The Municipalities concurred with TELUS that 311 call routing should follow the standard routing for a 10-digit call and stated that any technical issues that could not be resolved between parties should be referred to CISC.
73. In response to TELUS's suggestion that 311 services be as homogenous as possible throughout the country, the Municipalities argued that this was neither necessary nor appropriate. They submitted that the choice of services was a local concern that must be determined by the needs and desires of the local communities, and subject to financial and legal constraints that vary by municipality and by province.
74. The Municipalities were of the view that the implementation costs would be nominal and that there was no reason that the TSPs should not bear these costs.
75. With respect to ongoing costs, the Municipalities submitted that they did not expect the TSPs to bear the cost of long distance calls to the 311 call centers and that it should be the municipality's decision whether or not to assume that financial burden by establishing a toll-free number. They further submitted that the costs for wireless and payphone calls should be borne by the caller.
76. The Municipalities noted the Companies' view that dialing 311 would be significantly more expensive using credit card, third party billing and collect calls. They replied that collect calls would not be accepted, and that there should not be any notable number of operator assisted

calls to 311. With respect to credit card calls, the Municipalities indicated that not providing for such calls would be an unnecessary barrier to effective delivery of 311 services and that they would be interested in more information on the additional costs of these calls.

Commission's analysis and determination

77. The Commission notes that parties held differing views regarding the appropriate notification period for 311 implementation, responsibility for costs associated with 311 service and the geographical boundaries for 311 service.
78. With respect to the implementation timeframe, the Commission notes that certain TSPs objected to a three-month notification period and suggested that the timeframes be negotiated on a case-by-case basis. The Commission considers that three months is not sufficient for the necessary negotiations, network modifications, and system testing; however, the Commission considers that the timeframes should not be negotiated by the parties. The Commission considers that establishing a standard notification period would promote efficient collaboration between parties and prevent any protracted negotiations. The Commission expects that informal discussions regarding routing and boundaries would take place long before a date is set for implementation of 311 service, and considers that parties should not require a formal notification period of more than six months. The Commission therefore determines that each municipality wishing to implement 311 service should provide a minimum of six months notice to the TSPs operating within that municipality.
79. With respect to implementation costs, the Commission notes that in Decision 2001-475, it directed the TSPs to bear the cost of implementing 211 service on an incremental basis. The Commission further notes that in this proceeding, the TSPs have not indicated that the basic modifications required for the implementation of 311 service would be any different than those required for the implementation of 211 service. The Commission considers that 311 implementation should be similar to 211 implementation, and is of the view that the costs should also be similar.
80. With respect to the Companies' suggestion that the implementation costs be recovered from the respective deferral accounts, the Commission notes that not all TSPs have access to a deferral account. Therefore, the Commission considers that it would be inappropriate to permit ILECs to draw on a deferral account to pay for the implementation of 311.
81. The Commission notes that no party provided specific details regarding the costs of implementing 311 service. The Municipalities and Allstream submitted that the implementation costs would be minimal, but TELUS argued that these costs would not be insignificant. The Commission is of the view that the cost of implementing 311 service should be considered the cost of doing business and as such, that each of the TSPs should bear the costs of the basic implementation. Accordingly, the Commission directs the TSPs to assume, on an incremental basis, the costs of the basic switch modifications and network changes necessary for the implementation of 311 service.

82. The Commission notes the concerns expressed by certain TSPs, with respect to the implementation of 311 service according to municipal boundaries. Specifically, TELUS, the Companies, and the OTA were concerned that implementing 311 according to such boundaries would entail special provisioning measures and additional costs, submitting that their networks were not provisioned to route calls according to municipal boundaries.
83. The Commission notes that where municipal and exchange boundaries are not aligned, the TSPs would incur certain additional costs to provision 311 service according to municipal boundaries. The Commission notes that where 9-1-1 service has been implemented based on municipal boundaries, rather than exchange boundaries, the parties in question negotiated an agreement. The Commission considers that where the exchange boundary and the municipal boundary are different, the routing arrangements should be based on the exchange boundaries, unless otherwise negotiated by the municipality and the TSPs operating in that area. The Commission is of the view that if special routing arrangements are made, upon a municipality's request, the TSPs should not bear the cost of provisioning such arrangements.
84. The Commission notes that all parties agreed that the caller should bear the cost of 311 calls from a wireless telephone or a payphone. With respect to cost recovery for other types of calls (credit card, collect, toll, etc.), the Commission considers that arrangements should be negotiated between the municipalities and the TSPs, as each municipality will have its own requirements.
85. The Commission notes EastLink's suggestion that there should be certain industry standards for implementation agreements between municipalities and TSPs in order to ensure consistency. The Commission considers that each municipality will have unique requirements, based on consumer demands, municipal structure and available resources. Therefore, the Commission is of the view that any special arrangements or unique implementation techniques should be negotiated independently between municipalities and TSPs, on an individual basis. However, with respect to the suggestion that the CISC forum be used to address any technical issues that may arise, the Commission considers this appropriate, to the extent that the issues submitted to CISC are purely technical in nature.

c) Integration of 311 with 9-1-1

Position of parties

The Municipalities

86. The Municipalities stated that they may look into integrating 311 service with 9-1-1 service, submitting one option whereby caller identification and location information would 'sleep' on the line (i.e. would not be visible) and would be enabled, as required, to accompany the transfer of misdialed 9-1-1 calls. The Municipalities noted that this option would require appropriate network security and caller identification technologies.

Other parties

87. The Companies stated that the provision of originating caller location information and the transfer of 311 calls to 9-1-1 would be complex and costly, and could lead to problems in providing reliable 9-1-1 service. The Companies submitted that caller identification and location information should not be part of 311 service and suggested that if emergency calls are made to 311, call centre operators should advise callers to hang up and dial 9-1-1.
88. TELUS also opposed the integration of 311 and 9-1-1, noting that existing 9-1-1 agreements between local exchange carriers and municipalities prevent the sharing of 9-1-1 caller information for any purpose other than for responding to an emergency. With respect to the transfer of non-emergency calls from 9-1-1 to 311, TELUS maintained that there was no need for this transfer, since such calls are not urgent and customers can hang up and dial 311 directly. TELUS submitted that the transfer of calls from 9-1-1 to 311 would tie up 9-1-1 facilities and operator resources.
89. CWTA stated, with respect to any implementation requirements beyond the rerouting of calls, such as the integration of the 311 and 9-1-1 services, that the costs should not be the responsibility of the TSPs.

The Municipalities' reply comments

90. The Municipalities concurred with the Companies' submission that originating caller identification and location information should not be made part of the 311 service, but indicated that they remained open to any options that would enable efficient service handling when redirecting callers between 311 and 9-1-1.

Commission's analysis and determination

91. The Commission notes that the Companies and TELUS expressed concerns that the integration of 311 and 9-1-1 would be costly and problematic, and would pose confidentiality issues. The Commission further notes that the Municipalities, in their reply comments, concurred with the Companies' view that caller identification and location information should not be made part of the 311 service. The Commission considers that there are potential privacy concerns related to integrating the two services, and that caller identification and location information should not be made available on 311 calls.
92. The Commission notes that the Companies and TELUS submitted that, in the case of misdialed calls, callers should be advised to hang up and dial the appropriate number. The Commission considers this solution to be more effective and less complex than integrating the two systems. Furthermore, the Commission expects that non-emergency calls to 9-1-1 will become less of a problem as the public becomes increasingly aware of the existence and purpose of 311 service, noting that the availability of 311 service in the U.S. has helped to reduce the number of non-emergency calls to 9-1-1.

93. The Commission considers that the complexities, including privacy concerns, related to the integration of the 311 and 9-1-1 services, outweigh the benefits of integration. Accordingly, the Commission determines that 9-1-1 service and 311 service shall not be integrated.

d) Public awareness

Position of parties

The Municipalities

94. The Municipalities submitted that 311 services would be highly publicized to build public awareness and that publicity campaigns would be developed, in conjunction with 9-1-1 and 211 system providers, to reach all citizens regardless of age, income level, language or disability.

Other parties

95. The Companies submitted that municipalities should be required to ensure that there would not be any miscommunications regarding the promotion of 311 service, stating that it was critically important to ensure that 9-1-1 remained as the only number to be called in the event of emergencies. The Companies further submitted that there was potential for some overlap between the 211 public information and referral service and the proposed 311 service. TELUS requested that the Commission direct the Municipalities to undertake comprehensive public awareness campaigns. CWTA emphasized that such communication strategies should be the responsibility of the municipalities, not the TSPs.
96. UWGT stated it would cooperate with the City of Toronto during the introduction of 311 to ensure effective communications with the public about the intended purpose and value of both 211 and 311.

The Municipalities' reply comments

97. The Municipalities, noting that they were also 9-1-1 service providers, stated that ensuring public awareness of the distinction between the proposed 311 service and the existing 9-1-1 service was of tantamount importance to municipalities. With respect to effective public communications regarding the uses of 211 and 311 services, the Municipalities noted that several municipalities were already working with their local 211 implementation teams in efforts to facilitate the coordination of implementation.
98. The Municipalities agreed with the CWTA that the costs associated with public communications should be borne by the municipalities.

Commission's analysis and determination

99. The Commission notes that all parties agreed on the need for effective public awareness campaigns associated with the implementation of 311 service. The Commission further notes that parties, including the Municipalities, agreed that the costs of developing and carrying out such campaigns should be borne by each municipality that implements 311 service.

100. The Commission considers it necessary and in the public interest for the Municipalities to promote awareness of their 311 services, especially for the purpose of minimizing confusion between emergency and non-emergency services and between 311 and 211 services. The Commission expects the Municipalities to fulfill their commitment to undertake comprehensive and effective public awareness campaigns.

Secretary General

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