



Telecom Decision CRTC 2006-44

Ottawa, 28 July 2006

Applications for assignment of the 5-1-1 access code

Reference: 8698-C142-200601725, 8698-C12-200506719, 8698-J44-200500240,
8698-C12-200415522

*In this Decision, the Commission **approves** an application by the Intelligent Transportation Systems Society of Canada, on behalf of the Canada 511 Consortium, requesting the assignment of the 5-1-1 access code for the provision of weather and traveller information services, on the condition that the services remain free of charge.*

*The Commission **denies** an application by the Canadian Association for Suicide Prevention for assignment of the 5-1-1 access code for crisis intervention and suicide prevention services on the basis that the application does not meet all applicable criteria.*

Introduction

1. On 10 January 2005, the Intelligent Transportation Systems Society of Canada (ITS Canada), on behalf of the Canada 511 Consortium¹ (ITS Canada et al.), filed an application pursuant to Part VII of the *CRTC Telecommunications Rules of Procedure* (the Rules), proposing the assignment of the 5-1-1 access code for the purpose of delivering nationwide public weather and traveller information services.
2. ITS Canada et al. initially proposed to charge for delivery of weather information but filed an amended application dated 11 April 2005 that removed the proposed charge, making all of their proposed services free of charge.
3. On 15 February 2006, the Canadian Association for Suicide Prevention (CASP) filed an application pursuant to Part VII of the Rules, proposing the assignment of the 5-1-1 access code for the purpose of delivering urgent crisis intervention and suicide prevention services. The application was filed on behalf of the Canadian Distress Line Network (CDLN).²

¹ The Canada 511 Consortium consists of ITS Canada, Environment Canada, Transport Canada, the Canadian Urban Transit Association, the Transportation Association of Canada, and all ten provinces and the Yukon Territory.

² The Canadian Distress Line Network consists of the Canadian Mental Health Association – National Office; Nunavut Kamatsiaqtut Helpline; Chimo Helpline/Ligne d'écoute Chimo; Association québécoise de prévention du suicide; Centre de prévention du suicide et d'intervention de crise du Bas-Saint-Laurent; Centre Ressources Interventions Suicide du KRTB; Centre régional de prévention du suicide de l'Abitibi-Témiscamingue; Centre prévention suicide les Deux Rives; Centre d'intervention et de prévention du suicide Côte-Nord; Centre prévention suicide le Faubourg; Centre prévention suicide Haut-Richelieu; Distress Centre Ottawa; Distress Centres (North York, Scarborough and Toronto, Ontario); Distress Centre Niagara, Inc.; Klinik Community Health Centre; Distress Centre Calgary; British Columbia Crisis Line Association; Crisis Line of Kelowna Community Resources; Central Vancouver Island Crisis Society Crisis Line; NEED Crisis and Information Line; Fraser Valley Regional Crisis Line; S.U.C.C.E.S.S. Chinese Helplines; Crisis Line of the Indian Residential School Survivors Society; and Crisis Intervention and Suicide Prevention Centre of British Columbia.

ITS Canada et al.'s application

4. ITS Canada et al. submitted that their proposed 5-1-1 system would provide callers with real-time information on severe weather conditions, traffic congestion, status of roadway closures and conditions, as well as trip and schedule information. They also submitted that the service would allow callers to receive weather information about any location in Canada, regardless of the call's origin.
5. ITS Canada et al. submitted that if the Commission approved their proposal for the assignment of the 5-1-1 access code, their objective was to have the 5-1-1 service available across Canada, with weather forecasts and warnings available within 90 days after approval and traveller information added as data providers were able to provide that information. ITS Canada et al. also submitted that it would be reasonable for the Commission to monitor the roll-out and use of this resource through monitoring reports or meetings with 5-1-1 leaders across Canada.
6. ITS Canada et al. indicated that the Canada 511 Consortium would establish a single point of contact to act as its agent for the implementation, operation, and use of the 5-1-1 access code, and for communications with telecommunications service providers (TSPs) and the Commission. ITS Canada et al. submitted that they would select, via a request for proposals process, an entity such as a systems integration company, management company, or TSP to perform the role of the 5-1-1 service provider.

CASP's application

7. CASP submitted that designating the 5-1-1 access code for urgent crisis intervention and suicide prevention would enable service providers to fulfill the association's objective of accessibility. It also submitted that making the 5-1-1 access code synonymous with crisis intervention and suicide prevention in the same way that the 9-1-1 access code is synonymous with emergency response service would develop Canadians' awareness of the number to call if they were overwhelmed by loneliness, loss, grief, isolation, pain, and depression.
8. CASP submitted that by developing a network of crisis lines, its members would ensure that all Canadians had frontline, direct access to free, confidential crisis intervention and suicide prevention services at all times, in English and French, as well as in over 120 other languages.
9. CASP indicated that the purpose of the telephone crisis interventionist was to listen to a caller's concerns, assess the nature of the crisis, and reduce a caller's level of anxiety by defining the source of the crisis, clarifying positive options for resolving it, and providing appropriate assistance.

Process

10. In response to ITS Canada et al.'s application, the Commission issued *ITS Canada application for access code 5-1-1*, Telecom Public Notice CRTC 2005-5, 9 June 2005 (Public Notice 2005-5), inviting parties to comment on ITS Canada et al.'s application.

11. On 11 July 2005, Aliant Telecom Inc., Bell Canada, and Saskatchewan Telecommunications (SaskTel) (collectively, the Companies), TELUS Communications Inc.³ and TELE-MOBILE Company (collectively referred to as TCC), and the Canadian Wireless Telecommunications Association (CWTA) filed comments.
12. On 5 August 2005, the Companies and MTS Allstream Inc. (MTS Allstream) submitted interrogatories to ITS Canada et al. On 19 August 2005, ITS Canada et al. provided responses to the interrogatories.
13. On 29 September 2005, the Companies, MTS Allstream, and ITS Canada et al. filed further comments.
14. The Commission received reply comments from ITS Canada et al. and CASP dated 11 October 2005, from SaskTel dated 2 November 2005, and from MTS Allstream, ITS Canada et al. and the 211 Canada Steering Committee (211 CSC) dated 4 November 2005. The record of the Public Notice 2005-5 proceeding closed on 4 November 2005.
15. On 15 February 2006, CASP filed a Part VII application requesting that the 5-1-1 access code be assigned for urgent crisis intervention and suicide prevention services. CASP's application was served on all parties to the Public Notice 2005-5 proceeding.
16. On 20 February 2006, ITS Canada et al. filed a letter requesting that the Commission proceed with the CASP Part VII application. They noted that significant resources had been invested by the industry in participating in the Public Notice 2005-5 proceeding over the previous year and indicated that participating in a Part VII process initiated by the CASP application would be the most efficient way to respond under these circumstances.
17. In a letter dated 9 March 2006, the Commission advised all parties to Public Notice 2005-5 that the record of the proceeding had been re-opened to deal with the CASP Part VII application.
18. The Commission received comments regarding CASP's application from the Ontario 9-1-1 Advisory Board (OAB) dated 10 March 2006; from the 211 CSC dated 15 March 2006; and from the Companies, MTS Allstream, TCC, and ITS Canada et al. dated 17 March 2006.
19. On 30 March 2006, CASP filed reply comments.

Background

20. Within the North American Numbering Plan (NANP), which provides the framework for a continent-wide telephone number system, N-1-1 codes are assigned as an industry standard to provide access to specific types of services by dialing an abbreviated telephone number. For example, callers can dial 4-1-1 for directory assistance and 9-1-1 for emergency services. The 5-1-1 access code has not been assigned but was used in the past by wireless customers for roaming purposes. This access code was reclaimed in December 2004 and the reclamation process was completed by 30 June 2006.

³ Effective 1 March 2006, TELUS Communications Inc. assigned and transferred all of its assets and liabilities, including all of its service contracts, to TELUS Communications Company (TCC).

21. In *Allocation of three-digit dialing for public information and referral services*, Decision CRTC 2001-475, 9 August 2001 (Decision 2001-475), the Commission established the following guidelines to be used when considering the assignment of unused N-1-1 codes:
- 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;
 - the assignment of an unused N11 code should be to a service or services rather than a specific organization;
 - 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);
 - the N11 dialing should not confer a competitive advantage on the service provider(s) reached by this number;
 - the services to be provided through N11 dialing are to be widely available geographically and on a full-time or extended-time basis; and
 - where possible, the N11 allocation to a service does not conflict with NANP and is in keeping with the CSCN⁴ guidelines for N11.

Issues

22. The following issues must be examined in the determination of the assignment of the 5-1-1 code:
- a) The guidelines for assigning N-1-1 codes;
 - b) Public awareness campaign;
 - c) Implementation time frame; and
 - d) Routing, cost recovery, and other issues.

a) The guidelines for assigning N-1-1 codes

i) There is a compelling need for N-1-1 access or existing dialing arrangements are not suitable

ITS Canada et al.'s proposal

23. ITS Canada et al. submitted that current dialing arrangements for traveller and weather services varied from province to province and within provinces and territories. ITS Canada et al. noted that those services were currently provided by federal, provincial,

⁴ CSCN stands for Canadian Steering Committee on Numbering.

territorial, and local governments, as well as other service providers across the country, but that they were not universally and uniformly available. They added that having a universally available three-digit number would greatly facilitate public access to traveller and weather information nationwide, eliminating the need for users to determine local access numbers.

24. ITS Canada et al. argued that every Canadian would benefit from more efficient transportation systems in Canada and that there was a very broad public interest in ensuring that Canadian transportation systems were used as efficiently as possible. ITS Canada et al. submitted that evidence available from the United States confirmed that existing multiple-number dialing arrangements were not effective for public access and that there were significant benefits to individuals, businesses, and governments from the introduction of 5-1-1 service for weather and traveller information services.
25. TCC submitted that a single access number for weather and traveller information could overcome the inadequacies of existing dialing arrangements.
26. CASP was of the view that ITS Canada et al. had not satisfied this criterion.

CASP's proposal

27. CASP submitted that in light of the multiple telephone numbers that were currently used to provide crisis intervention and suicide prevention services, and the increasing number of jurisdictions that were moving from 7- to 10-digit dialing, Canada must develop a simple way for callers to directly access crisis intervention and suicide prevention services when they were urgently needed by individuals in crisis. CASP added that when an individual was suicidal or suffering from personal crisis, it was essential that they knew who and where they could call to receive help. According to CASP, the current dialing requirements undermined the ability of Canadians to receive the essential, urgent, and appropriate assistance that was available to individuals in crisis.
28. CASP submitted that the services currently provided by or planned for the 2-1-1 and 8-1-1 access codes were not capable of delivering the support that was recognized to be critical in mitigating a crisis prior to it becoming an emergency.⁵ CASP added that based on the present state of health information services in operation in Canadian provinces, callers to 8-1-1 would only have access to non-urgent health care teletriage services.
29. CASP submitted that the emergency response services provided by dialing 9-1-1 were not designed to offer support and counselling at an urgent and critical moment in a caller's life. It submitted that 9-1-1 service was intended to provide immediate assistance to those who were at risk of imminent harm or who had suffered harm as a result of an emergency situation. CASP added that, in contrast, those who provided crisis intervention and suicide prevention services were trained to intervene in a crisis and provide urgent support and assistance prior to the escalation of a crisis to an emergency.

⁵ The 2-1-1 access code is currently used for public information and referral services, while the 8-1-1 access code is used for non-urgent health teletriage services.

30. CASP noted that distress lines in British Columbia had recently developed, in conjunction with 9-1-1 operators and the local telecommunications carrier, a pilot suicide prevention line – 1-800-SUICIDE – that served all of British Columbia. According to CASP, a similar toll-free suicide prevention line had operated throughout Quebec for more than four years.
31. TCC submitted that since distress centres had supported the assignment of 2-1-1 for the provision of information and referral services in the proceeding leading to Decision 2001-475, it could only assume that the distress centres thought that 2-1-1 would, at least in part, meet the needs of callers to their services. TCC also submitted that the Commission should carefully consider whether the 8-1-1 access code could address at least some of the needs described in CASP's application, once such services were fully implemented. TCC indicated that it was unclear whether there was a compelling need for a separate, dedicated, three-digit access number that could not be satisfied by other dialing arrangements.
32. The 211 CSC submitted that 2-1-1 service assisted callers in crisis to quickly and safely reach the trained help they needed. The 211 CSC further submitted that building on the collaborative relationship between 2-1-1 proponents and the crisis intervention and suicide prevention community would result in a better, more comprehensive service access and delivery system. The 211 CSC added that separating access to crisis intervention and suicide prevention services from the broader 2-1-1 community services access system would serve to increase the stigma and shame that CASP had identified as one of the main barriers to care faced by people coping with personal crisis, emotional turmoil, depression, or mental illness. The 211 CSC submitted that it did not believe that CASP's application met the criterion regarding compelling need or unsuitable existing arrangements.
33. The 211 CSC submitted that professional 2-1-1-trained information and referral specialists offered 24-hour, live, multilingual assistance. It also submitted that each licensed 2-1-1 service provider must meet the standards of the Alliance of Information and Referral Systems (AIRS) accreditation program and that their staff must attain and maintain professional certification to answer 2-1-1 calls. The 211 CSC indicated that a 2-1-1 service provider must both train its staff in how to handle a crisis call and develop service delivery protocols with 9-1-1 service providers and area crisis and suicide prevention telephone services. It submitted that although crisis or distress lines and 2-1-1 or information and referral (I & R) lines were unique services, there were also some significant similarities in service provision, including active listening, risk assessment, and information on community resources. The 211 CSC noted that two of the five existing 2-1-1 centres in Canada – in Calgary and Edmonton – were crisis intervention and suicide prevention service providers.
34. The OAB submitted that primary public safety answering points were operated by a variety of police services across 99 percent of Ontario. The OAB argued that 9-1-1 call-takers in Ontario were well trained and dealt daily with the responsibility of dealing with callers in an endless variety of crises. It submitted that, generally, when a 9-1-1 caller was seeking counselling but was not deemed to be an immediate danger to themselves or to others, the caller was referred to an appropriate local crisis line. Conversely, when advised by a crisis centre about a caller in need of immediate emergency help, 9-1-1 centres worked closely with that crisis centre to achieve a safe and effective response. The OAB indicated that it viewed its relationship with the crisis centres to be a reciprocal one.

35. ITS Canada et al. submitted that they recognized that the organizations involved in crisis intervention and suicide prevention provided a valuable social service that was necessary to the health and well-being of Canadians. They submitted, however, that CASP's application did not meet the criteria for the allocation of an N-1-1 access code. ITS Canada et al. suggested that the Commission should consider that the service was being properly delivered or could be delivered through the existing assignments of the 2-1-1, 8-1-1, and 9-1-1 access codes or via the toll-free number 1-800-SUICIDE.
36. According to ITS Canada et al., for those communities that had implemented or were implementing 2-1-1 service, the CASP application raised important issues regarding proper definition of roles, service coordination, additional costs to the public, and duplication of services. They suggested that assigning an additional N-1-1 number for the single purpose of suicide prevention would create an overlap, thereby adding to the public's confusion about where to turn for help. ITS Canada et al. submitted that since the 2-1-1 service was already able to fulfill the function of providing this crucial, urgent information, another similar number would add to the very confusion and frustration that 2-1-1 was intended to alleviate.
37. ITS Canada et al. also submitted that the 8-1-1 access code could provide a viable option for the supply of critical mental health care solutions. They suggested that the 8-1-1 service's highly trained medical staff, service arrangements with 9-1-1, provincial funding, province-wide 24-hour service, and the protocol for handling callers with urgent medical conditions served to address all types of medical needs, including mental health conditions such as severe depression, stress, or suicidal thoughts.
38. ITS Canada et al. added that a coordinated effort among crisis and distress centres to increase awareness of crisis and suicide issues in Canada and the use of a highly visible and easily remembered number similar to 1-800-SUICIDE would serve to improve access for Canadians, without using an N-1-1 code. They indicated that the toll-free number 1-800-SUICIDE was used in the United States for suicide prevention and that similar initiatives existed in British Columbia and Quebec. ITS Canada et al. was of the view that resolving the coordination difficulties that might exist among distress and crisis centres could be accomplished through alternative means, including a 1-800-SUICIDE hotline, along with increased promotion of the 2-1-1 service.
39. In reply, CASP submitted that 2-1-1 was a referral service that could not and did not provide counselling services. It also submitted that it was not widely available in Canada and hence, the majority of Canadians did not have constant access to this service.
40. CASP also noted that while 8-1-1 service had not been implemented for health teletriage yet, existing telephone health triage services did not provide adequate crisis intervention services. CASP added that based on its experience and observation, persons contemplating suicide might not call 9-1-1 since police intervention or emergency hospital admittance was not what the caller wanted.

Commission's analysis

41. The Commission notes that there is broad support from many parties, including different levels of government, for ITS Canada et al.'s proposed assignment of the 5-1-1 access code.⁶
42. The Commission considers that ITS Canada et al.'s proposal would provide greater safety and convenience for travellers as well as benefits for the environment.
43. The Commission notes that none of the existing or proposed N-1-1 service providers are providing or planning to provide weather and traveller information as proposed by ITS Canada et al. The Commission therefore concludes that there would be no possible confusion with the services to which the other N-1-1 access codes have been assigned.
44. The Commission notes that although weather and traveller information is available separately through a number of sources, such information is not available through an N-1-1 service and no one-stop integrated service currently exists to provide both types of information. Accordingly, the Commission considers that ITS Canada et al. meet the first criterion of the guidelines.
45. The Commission notes that there is also broad support for CASP's proposed assignment of the 5-1-1 access code from different organizations as well as 16 individuals and several government representatives.⁷
46. With respect to the suggestions that CASP use the 8-1-1 service for crisis intervention and suicide prevention, the Commission notes that in Alberta Health and Wellness' 2004 application for the 8-1-1 access code, crisis intervention and suicide prevention were not part of the proposed service for non-urgent health teletriage. The Commission recognizes that those call centres will be staffed with highly trained health professionals, but that these professionals may not be trained to provide suicide prevention services. The Commission does not consider that callers in distress should be encouraged to dial 8-1-1 since crisis intervention and suicide prevention are not part of the service's mandate.
47. The Commission notes that 9-1-1 call-takers are well-trained operators who are used to dealing with people in crisis, but that the 9-1-1 emergency service is essentially that of a dispatcher. The Commission recognizes that the 9-1-1 services could at times complement crisis intervention and suicide prevention, but that those services are very distinct and different in nature from emergency services. It is also important to note that 9-1-1 calls must remain short to ensure that lines are always available so that callers do not get busy signals. The Commission recognizes that people will dial 9-1-1 for crisis intervention and suicide prevention occasionally but considers that this practice should not be encouraged. The Commission notes that the 9-1-1 call-taker's response to these calls is to transfer them to a crisis intervention service.

⁶ Prior to the beginning of this proceeding, between December 2004 and January 2005, the Commission received 21 letters in support of ITS Canada et al.'s application.

⁷ Between January 2006 and March 2006, the Commission received 42 letters in support of CASP's application. Two of those letters consist of petitions totalling 200 signatures.

48. With respect to the use of the 2-1-1 access code for crisis intervention and suicide prevention, the Commission notes that in the proceeding leading to Decision 2001-475, the United Way submitted that 2-1-1 would provide information and referrals to individuals on a wide range of services available in their communities, including but not limited to: food, shelter, and clothing; emergency assistance; and crisis intervention. The Commission also notes that in Decision 2001-475, the Commission approved the allocation of 2-1-1 dialing to provide information and referral services based on the United Way's proposed model.
49. The Commission notes that those 2-1-1 call centres established in collaboration with 211 CSC must meet the standards of the accreditation program developed by AIRS, and that call centre staff must attain and maintain professional certification to answer 2-1-1 calls or to manage 2-1-1 resource databases.
50. The Commission considers that given the stringent standards of the accreditation for 2-1-1 I & R call centres, 2-1-1 call-takers are sufficiently trained to fulfill an assessment role in crisis intervention, which CASP indicated was to listen to the caller's concerns, assess the nature of the crisis, and reduce the caller's level of anxiety by defining the source of the crisis, clarifying positive options for resolving it, and providing appropriate assistance.
51. The Commission notes that two of the existing 2-1-1 call centres in Canada are crisis centres that have been accredited to provide I & R services. The Commission considers that the services to which CASP proposed that the Commission assign the 5-1-1 code are already being provided or could be provided through 2-1-1 services.
52. The Commission recognizes that CASP members provide a valuable social service that is beneficial to the health and well-being of Canadians. The Commission considers, however, that assigning an N-1-1 code for crisis intervention and suicide prevention would create at the minimum a partial overlap of services with 2-1-1 and would add to the public's confusion regarding which number to call for help. The Commission agrees with the 211 CSC submission that building on the relationship between 2-1-1 service providers and the crisis intervention and suicide prevention community would result in a better, more accessible, and more comprehensive service, and a better delivery system.
53. The Commission notes that the toll-free number 1-800-SUICIDE is being used in British Columbia, part of Quebec, and the United States for suicide prevention. The Commission further notes that this toll-free number is currently available for use in the remainder of Canada, should other suicide prevention centres choose to use it.
54. The Commission agrees with ITS Canada et al.'s position that a coordinated effort among crisis and distress centres to increase awareness of crisis and suicide issues in Canada, and the use of a highly visible and easily remembered number such as 1-800-SUICIDE, would serve to improve access by Canadians to the help they require. The Commission considers that a bilingual number like 1-800-SUICIDE might reduce some of the confusion about which number to call for help and would also help to reduce the duplication of services with 2-1-1 service providers.

55. The Commission considers that 1-800-SUICIDE, which is available for use in all of Canada, could constitute a suitable existing arrangement to provide urgent crisis intervention and suicide prevention services.
56. The Commission considers that suitable arrangements other than use of the 5-1-1 code could be used to provide urgent crisis and suicide prevention service, and that CASP has failed to demonstrate the contrary.
57. In light of the above the Commission concludes, therefore, that CASP has not demonstrated a compelling need that cannot be satisfied by other dialing arrangements or that existing arrangements are not suitable. CASP did not demonstrate to the satisfaction of the Commission that the 2-1-1 code would not be suitable for accessing the needed crisis intervention and suicide prevention services.
58. In summary, the Commission considers that only ITS Canada et al.'s application meets the criterion that there is a compelling need for N-1-1 access that cannot be satisfied by other dialing arrangements or existing dialing arrangements are not suitable.

ii) The N-1-1 code should be assigned to a service, rather than an organization

ITS Canada et al.'s proposal

59. ITS Canada et al. submitted that under their proposal, the 5-1-1 access code would not be tied to a specific organization, but would be available for use by all provincial and territorial jurisdictions across Canada. ITS Canada et al. submitted that each province would have the authority to determine the overall design of traveller information within the province, working in conjunction with the Canada 511 Consortium and the 5-1-1 service providers.

CASP's proposal

60. CASP submitted that its proposed assignment of the 5-1-1 access code would enable the organizations that made up the CDLN to coordinate the services provided by dozens of independent but cooperating crisis line and distress centre organizations. It submitted that the organizations were working together toward a national accreditation system that would ensure the maintenance of high standards by all service providers within the CDLN.

Commission's analysis

61. The Commission finds that both applications meet the criterion that the N-1-1 code be assigned to services rather than an organization.

iii) N-1-1 service should serve the broad public interest

ITS Canada et al.'s proposal

62. ITS Canada et al. submitted that an easily remembered number such as 5-1-1 was critical to providing services in a way that was accessible to all Canadians. ITS Canada et al. indicated

that Environment Canada's current network received 35 million calls per year and it was anticipated that the weather information portion of the 5-1-1 service would generate 100 million calls annually.

63. ITS Canada et al. submitted that using the 5-1-1 access code for weather and traveller information would convey substantial public and private benefits, such as increased efficiency, reduced traffic congestion and pollution, lower fuel consumption, superior traffic management, enhanced safety, and better decision-making during inclement or severe weather.

CASP's proposal

64. CASP submitted that the 5-1-1 access code and services provided would be accessible to all Canadians. CASP indicated that, collectively, the suicide prevention organizations received more than 40,000 suicide-related telephone calls alone in a typical year. CASP added that assigning the 5-1-1 code for provision of crisis intervention and suicide prevention services would benefit all Canadians, not just those who called.
65. CASP submitted that the assignment of the 5-1-1 access code to crisis intervention and suicide prevention services in Canada had several benefits, including improving access to an essential service; increasing the safety of Canadians by reducing the burden on 9-1-1 systems, thereby enhancing emergency response time; and improving service outcomes and consequently improving the general public health and safety of Canadians.
66. CASP submitted that designating the 5-1-1 code to crisis intervention and suicide prevention services was a means to save lives, and that the enormous human cost associated with suicide and self-harming behaviours imposed a significant financial burden on Canadian society.
67. TCC submitted that ITS Canada et al.'s proposal would serve the broad public interest. TCC noted that there was a limited use for 5-1-1 service as contemplated in the CASP application but added that the Commission would have to balance the lower volume demand for 5-1-1 to access essential crisis intervention and suicide prevention services with the much higher volume demand for 5-1-1 to support transportation and weather information services, although for a somewhat less essential service.

Commission's analysis

68. The Commission notes that easy access to weather and traveller information can ultimately improve safety on the roads, reduce congestion and pollution and lower fuel consumption, and therefore benefit all Canadians. The Commission also notes that suicide is a significant social and health issue in Canada and that easy, one-step access to help can save lives.
69. The Commission considers that both proposed services would serve the broad public interest and be accessible directly or indirectly by a large number of Canadians, and therefore concludes that both applications meet this criterion.

iv) The N-1-1 service should not confer a competitive advantage on any service provider(s)

ITS Canada et al.'s proposal

70. ITS Canada et al. submitted that the use of the 5-1-1 access code for weather and traveller information services would provide a regional service provided jointly by provincial, territorial, and municipal governments, and would not be commercial in nature.

CASP's proposal

71. CASP submitted that the assignment of the 5-1-1 access code to crisis intervention and suicide prevention services would not confer a competitive advantage on the service providers reached by this number. CASP added that the organizations that offered these services were non-commercial entities that relied on highly trained volunteers and professionals to provide timely assistance to Canadians in crisis.

Commission's analysis

72. The Commission considers that both services would not confer a competitive advantage on any service providers and therefore meet this criterion.

v) The N-1-1 service should be widely available on a full-time or extended-time basis

ITS Canada et al.'s proposal

73. ITS Canada et al. submitted that their proposed 5-1-1 service would be available 24 hours a day, 7 days a week to all Canadians.

CASP's proposal

74. CASP submitted that the 5-1-1 access code would enhance the availability of crisis intervention and suicide prevention services for all Canadians, 24 hours a day, 7 days a week.

Commission's analysis

75. The Commission is satisfied that both services would be available on a full-time basis and therefore meet this criterion.

vi) N-1-1 allocation should not conflict with the NANP and should be in keeping with CSCN guidelines

ITS Canada et al.'s proposal

76. ITS Canada et al. submitted that the assignment and adoption of the 5-1-1 access code for weather and traveller information services in Canada would be consistent with both the NANP and the CSCN policy for the use of N-1-1 access codes.

77. TCC was of the view that the assignment of the 5-1-1 access code to transport, weather, and transit services did not conflict with any NANP or CSCN guidelines for N-1-1 access codes.

CASP's proposal

78. CASP submitted that the adoption of the 5-1-1 access code for crisis intervention and suicide prevention services in Canada would maintain the integrity of the NANP, and would be in line with the CSCN policy for the use of N-1-1 numbers.
79. ITS Canada et al. submitted that CASP's application was inconsistent with the NANP because 5-1-1 access code is used for the provision of travelling information in the United States.

Commission's analysis

80. The Commission considers that neither application conflicts with the NANP and that each application is in keeping with CSCN guidelines.

Commission's determinations

81. In light of the fact that only ITS Canada et al.'s proposal meets all six of the criteria established by the Commission for the assignment of an N-1-1 access code, the Commission considers it appropriate to approve ITS Canada et al.'s application. The Commission notes that ITS Canada et al. initially proposed to charge for the delivery of weather information and that they later amended their application, making all of their proposed services free of charge. In the interest of greater accessibility for all Canadians, the Commission **approves** ITS Canada et al.'s application on the condition that the services remain free of charge. The Commission **denies** CASP's application.
82. In Decision 2001-475, the Commission noted that it would be open to using a public process to reassign an N-1-1 access code to another service if it believed the original assignment was not appropriate to the service being delivered. The N-1-1 is a scarce resource and the Commission considers it necessary that it be provided with all the information that it needs to monitor service deployment, if required.
83. The Commission directs the 5-1-1 weather and travel service providers to track roll-out information, such as locations where the service is available, which service is available, and the usage (number of calls). The Commission also directs that these details be tracked separately for weather and traveller information. This information should be available upon request by the Commission in order to evaluate service deployment. This information could eventually be used as the basis for deciding whether to launch a reclamation process in the future as the Commission may deem appropriate.
84. The Commission's consideration of implementation details regarding ITS Canada et al.'s proposal is set out in the following sections.

b) Public awareness campaign

Positions of parties

85. ITS Canada et al. submitted that a public awareness campaign would help to reduce any confusion among the various N-1-1 services.⁸
86. The Companies submitted that it was critically important that there was no confusion regarding the types of services available via the 5-1-1 access code versus other N-1-1 access codes, in particular 9-1-1 emergency services. The Companies added that, consistent with *Assignment of 311 for non-emergency municipal government services*, Telecom Decision CRTC 2004-71, 5 November 2004 (Decision 2004-71), agencies using the 5-1-1 access code should be required to clearly communicate in their promotional materials the purposes for which the proposed 5-1-1 service was intended.
87. TCC requested that the Commission direct ITS Canada et al. to undertake a comprehensive public awareness campaign, in which they should clearly indicate to the public the types of services that would be available through 5-1-1 and provide information about how those services differed from the other newly introduced N-1-1 services.

Commission's analysis and determinations

88. The Commission notes that ITS Canada et al., the Companies and TCC agreed on the need for effective public awareness campaigns associated with the implementation of the 5-1-1 service. The Commission also notes that in Decision 2004-71 and *Alberta Health and Wellness' request for code 8-1-1 for non-urgent health teletriage services*, Telecom Decision CRTC 2005-39, 6 July 2005 (Decision 2005-39), the Commission considered that it was necessary and in the public interest for service providers to promote awareness of their respective N-1-1 services, especially for the purpose of minimizing confusion between emergency and non-emergency services. Similarly, the Commission considers it necessary and in the public interest for weather and traveller information service providers to promote awareness of their 5-1-1 services for the same purposes. Accordingly, the Commission directs all 5-1-1 service providers to undertake comprehensive and effective public awareness campaigns. The Commission also directs the 5-1-1 weather and travel service providers to track details of their public awareness campaigns. This information should be available upon request by the Commission.

c) Implementation time frame

Positions of parties

89. ITS Canada et al. submitted that their proposed 5-1-1 service would be implemented nationally for weather information within 90 days of a decision. They also submitted that the traveller information would be implemented incrementally based on provincial, territorial, and/or regional readiness, and with three months' notice to the TSPs.

⁸ With this Decision, all N-1-1 access codes will have been assigned.

90. The Companies submitted that a telecommunications network's state of readiness to route calls dialed using N-1-1 access codes would vary by TSP and geographic location. The Companies also submitted that some TSPs might not be able to provide 5-1-1 abbreviated dialing upon short notice, such as the three-month notice period proposed by ITS Canada et al. The Companies suggested that for those reasons the implementation date should be determined based upon negotiations between the agency endorsed to use the 5-1-1 access code and the TSPs operating in the area where the service was requested. The Companies were of the view that, at a minimum, each province or territory that wished to implement 5-1-1 service in an area should provide a minimum of six months' notice to the TSPs operating within the area.
91. MTS Allstream submitted that ITS Canada et al.'s request for implementation within 90 days of a Commission decision could not be met due to the complex implementation scheme they had proposed.
92. TCC suggested that the Commission should maintain the six-month roll-out timetable used in Decisions 2004-71 and 2005-39. TCC urged the Commission to consider a more lengthy timetable if ITS Canada et al. proposed a full national implementation.
93. The CWTA submitted that to expect TSPs to make all switching and routing modifications within 90 days of a decision would be inconsistent with the manner in which previous N-1-1 services had been implemented. The CWTA was of the view that TSPs required a reasonable opportunity to investigate and determine the routing implication of the proposals. The CWTA submitted that after that investigative period, a six-month notification period like the one used to implement 3-1-1 service would likely allow sufficient time for wireless service providers (WSPs) to plan for implementation.

Commission's analysis and determinations

94. The Commission considers that implementing 5-1-1 service requires technical modifications to TSPs' networks that are similar to those required to implement 3-1-1 service or 8-1-1 service, for which a six-month notice was found to be appropriate. Accordingly, the Commission directs each 5-1-1 service provider to provide a minimum of six months' notice to the TSPs operating within that province or territory. A copy of the six-month notice should also be filed with the Commission for information purposes.

d) Routing, cost recovery, and other issues

Positions of parties

95. ITS Canada et al. submitted that calls to the 5-1-1 access code, along with caller identification, would be routed by local exchange carriers or WSPs to the 5-1-1 service provider. ITS Canada et al. submitted that 5-1-1 service providers would apply intelligent call routing and integrated voice response technologies in order to direct calls to the appropriate information agencies, which would then provide the weather and traveller information services.

96. ITS Canada et al. submitted that the precise design of the network and the information content would be determined by the 5-1-1 service providers following the Commission's approval of the assignment of the 5-1-1 access code. They proposed that the TSPs bear the incremental costs of implementing the 5-1-1 service.
97. The Companies submitted that the application lacked clarity regarding the overall system design by which multiple weather and traveller information service providers would share the use of the 5-1-1 service code and associated call routing arrangements. The Companies submitted that a clear distinction must be drawn between basic first-step network routing provided by the 5-1-1 service providers and any enhanced second-step routing to either another automated system or operators in call centres. The Companies also submitted that routing arrangements should be based on the wireline exchange area boundaries and wireless service area boundaries, unless otherwise negotiated.
98. The Companies submitted that, consistent with Decision 2004-71, there should not be any regulatory requirement for the TSPs to complete operator-handled 5-1-1 calls.
99. TCC submitted that a service provider could only route 5-1-1 calls to one destination in any specific geographic area and, therefore, it was essential that ITS Canada et al. decide which of their members was the designated applicant for 5-1-1 services in any geographic area.
100. TCC indicated that it supported exchange-based routing concepts for wireline calls and calling area routing for wireless calls. TCC noted that wireline exchange boundaries and wireless calling areas might not be aligned with municipal or regional governmental boundaries. TCC submitted that if ITS Canada et al. required special routing that aligned with local government boundaries, it should be negotiated between the parties as required.
101. TCC submitted that 5-1-1 calls might be handled on the TELE-MOBILE wireless network as local calls and charged as per the wireless subscriber's rate plan if the 5-1-1 caller and the 5-1-1 service provider's point of presence were in the same local wireless calling area. TCC recommended providing 5-1-1 calling from pay telephones using cash, credit, or prepaid calling cards. TCC submitted that it was prepared to enable other billing options, provided the 5-1-1 service provider negotiated suitable compensation for 5-1-1 use with TCC.
102. The Companies noted that there were difficulties inherent in determining the actual location of a subscriber to nomadic and non-native voice over Internet protocol (VoIP) services, as demonstrated by the issues inherent in providing 9-1-1 service to VoIP customers. The Companies therefore proposed providing VoIP service providers with the options of a) not delivering 5-1-1 calls, b) routing 5-1-1 calls to a non-geographically limited answering position, or c) delivering 5-1-1 calls based on the originating number. They noted that the interim solution developed for the 9-1-1 service issues required the manual intervention of a third-party answering point. The Companies submitted that the interim 9-1-1 solution would not be suitable for 5-1-1 service due to the less critical nature of the proposed 5-1-1 service and the anticipated very high level of traffic.

103. TCC noted that it might be impossible for some VoIP carriers to route 5-1-1 calls to the appropriate 5-1-1 service provider. TCC recommended, therefore, that ITS Canada et al. retain and publish toll-free or alternative geographically based 7- or 10-digit numbers for their 5-1-1 service providers.
104. ITS Canada et al. proposed that 5-1-1 service providers and TSPs negotiate the costs for long distance charges for 5-1-1 service, and that 5-1-1 service providers pay those costs. ITS Canada et al. also proposed the recovery of local and long distance costs for WSPs for 5-1-1 calls by charging users as part of the monthly charge for use of a wireless service, or otherwise as part of a service contract with a wireless carrier.
105. The Companies submitted that the costs of implementing local 5-1-1 routing arrangements should be borne by the TSPs operating in a given area. The Companies submitted that any other arrangements required by ITS Canada et al. should be subject to the applicable tariffs or direct negotiations between ITS Canada et al. and the TSPs.
106. The Companies and TCC suggested that where long distance charges would normally apply, the 5-1-1 number be translated into a toll-free number and routed to ITS Canada et al.'s system via one or more interexchange carriers' toll-free services, at a charge to ITS Canada et al.
107. TCC recommended that the municipal, regional, provincial, and territorial departments and agencies that chose to implement 5-1-1 dialing bear the implementation and operational costs for providing the service. TCC submitted that if the Commission approved the proposed national roll-out and timing, it would be inappropriate for carriers to bear all the costs of implementing the necessary switching and routing changes.
108. The CWTA submitted that when the Commission determined that TSPs would bear the cost of implementing an N-1-1 service on an incremental basis in Decisions 2001-475, 2004-71, and 2005-39, it did so with the understanding that the changes required would be implemented over a number of years and scheduled with other work on switching. The CWTA further submitted that if all the necessary switching routing modifications required for the implementation of 5-1-1 service had to be done within 90 days of a decision, it would impose considerable costs on TSPs.
109. The CWTA submitted that WSPs must be able to charge regular rates, including regular airtime usage charges for prepaid subscribers or monthly billed subscribers who exceeded monthly minute bundles, for all 5-1-1 calls, consistent with Decisions 2001-475, 2004-71, and 2005-39.
110. ITS Canada et al. recommended the formation of a CRTC Interconnection Steering Committee (CISC) 5-1-1 subcommittee to address technical issues. They submitted that, as with other CISC committees, membership on the committee would be open to all interested parties.
111. The Companies agreed that technical issues should be addressed by CISC. The Companies noted that CISC working groups could address any technical issues that might arise that were within their mandates, and CISC could address any other issues related to the implementation of 5-1-1 service if necessary.

112. TCC recommended referring any unresolved technical and implementation issues to CISC.

Commission's analysis and determinations

113. The Commission notes that the Companies and TCC submitted that routing arrangements should be based on the wireline exchange area boundaries and wireless service area boundaries, unless otherwise negotiated by the 5-1-1 service provider and the TSPs operating in that area. The Commission also notes that in Decisions 2001-475, 2004-71, and 2005-39 it determined that the routing arrangements for N-1-1 calls would be based on exchange boundaries, unless otherwise negotiated. The Commission considers that the routing arrangements determined in those decisions should apply to the 5-1-1 service. Accordingly, the Commission determines that call routing arrangements should be based on exchange boundaries, unless otherwise negotiated by the 5-1-1 service provider and the TSPs operating in that area.
114. The Commission further notes that both the Companies and TCC identified problems with routing 5-1-1 calls from VoIP customers. The Commission considers that call routing to 5-1-1 service providers from VoIP services should be negotiated between the various parties, and that these discussions could take place within CISC.
115. With respect to cost recovery for 5-1-1 service, the Commission notes that in Decisions 2004-71 and 2005-39, it directed the TSPs to assume, on an incremental basis, the costs of the basic switch modifications and network changes necessary for the implementation of the 3-1-1 and 8-1-1 services. In the same decisions, the Commission considered that if special routing arrangements were made upon a service provider's request, the TSPs should not bear the cost of provisioning such arrangements. Consistent with Decisions 2004-71 and 2005-39, the Commission directs TSPs to assume, on an incremental basis, the costs of the basic switch modifications and network changes necessary for the implementation of 5-1-1 service. Further, the Commission determines that 5-1-1 service providers that request special routing arrangements should bear the cost of provisioning such arrangements.
116. Consistent with Decision 2004-71, the Commission determines that, with the exception of toll charges, callers should bear the costs of 5-1-1 calls placed from wireless networks and from pay telephones. For other types of calls (credit card, collect, toll, etc.), cost recovery arrangements should be negotiated between the 5-1-1 service providers and the TSPs.
117. The Commission considers that any purely technical issues arising from the implementation of the 5-1-1 service can be addressed by CISC and requests CISC to deal with such matters.

Secretary General

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