

**Before the
CANADIAN RADIO-TELEVISION AND TELECOMMUNICATIONS COMMISSION
OTTAWA**

Improving the routing of 9-8-8 calls and texts: CRTC 2025-20

COMMENTS OF THE VOICE ON THE NET COALITION

The Voice on the Net (“VON”) Coalition¹ hereby submits these comments in response to the call for comments,² wherein the Canadian Radio-television and Telecommunications Commission (“CRTC”) seeks comment on how to improve the routing of 9-8-8 calls and texts to the Centre for Addiction and Mental Health (CAMH). In particular, the CRTC asks about alternative routing methods, including implementation of geo-routing for 988 calls or texts to the CAMH.³ VON supports the CRTC’s goal of ensuring easy, intuitive and available access to suicide prevention and mental health crisis intervention services. However, limitations on the availability of location technology make it infeasible for nomadic VoIP or over-the-top text providers to implement geo-routing solutions for calls or texts to 988 at this time.

DISCUSSION

Nomadic VoIP calling and over-the-top text messaging. The CRTC should not adopt geo-routing for 988 calls or over-the-top text messages originated by nomadic VoIP or text providers. Nomadic VoIP calling and over-the-top text messaging is different than landline and

¹ The VON Coalition works to advance regulatory policies that enable Americans to take advantage of the promise and potential of internet communications. See www.von.org.

² Call for Comments (CFC), CRTC 2025-20, Public Record: 1011-NOC2025-002 (January 27, 2025).

³ Geo-routing solutions would route calls to 988 based on the caller’s location, not the area code associated with the phone. CFC at Footnote 6.

wireless calling, fixed VoIP, and SMS. It is technically infeasible to require any service provider, to get location information from their users, when they are not providing the network infrastructure, and then expect that the provider can route 988 calls or texts based on that location.

Nomadic VoIP providers and over-the-top text providers generally do not have access to real-time routable location information, and because they do not operate a network, as is the case for traditional landline and wireless calling, they must rely upon obtaining consent of the end user before having access to any location information. However, that consent may not always persist as it may be revoked by the end user at any time. Moreover, the availability of location information is not consistent across end user devices and platforms (unlike landline and wireless calling) and therefore is not uniformly reliable for routing purposes.

The other technical complications preventing nomadic VoIP providers and over-the-top text providers from employing geo-routing for 988 calls is that there is not always a native voice service tied to the end user device, as is the case for traditional landline and wireless carriers. For example, traditional wireless carriers own, operate and manage the network infrastructure required to implement potential geo-routing solutions. In the case of nomadic VoIP providers and over-the-top text messages, services are generally accessed through broadband connections obtained by the customer, or through public or private Wi-Fi connections further complicating the required routing.⁴

Further, if the CRTC were to proceed in adopting DID routing exclusively, it would be

⁴ Current Wi-Fi technologies present reliability issues when transmitting a user's location information as that information is tied to the router to which the user is connected. In some instances, even entering a room merely several feet from the router could significantly lower the Wi-Fi signal and thus lessen the accuracy and reliability of transmitting location information. Moreover, users can always opt out of Wi-Fi location tracking altogether.

leaving out prior considerations for nomadic VoIP and over-the-top text providers who rely upon the availability of national crisis centre routing. Thus, those providers would be failing to meet CRTC established call routing requirements and goals that calls from nomadic VoIP users and calls using video relay service must be implemented in the same way as all 9-8-8 calls.⁵

CONCLUSION

The CRTC should act in accordance with the recommendations herein

Respectfully submitted,

VOICE ON THE NET COALITION

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⁵ *Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing*, Telecom Regulatory Policy CRTC 2022-234, 31 August 2022.