



September 13, 2024

Senior Director
Space Services and International Engineering, Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street, East Tower, 6th Floor
Ottawa, Ontario
K1A 0H5

Attention: Senior Director

Re: Notice reference number SMSE-006-24. Canada Gazette, Part I, Volume 158,
Number 26, Publication Date of June 29, 2024.

*Title: “Consultation on a Policy, Licensing and Technical Framework for Supplemental
Mobile Coverage by Satellite”*

1. The Canadian NG9-1-1 Coalition wishes to provide comments in support of expanding supplemental mobile coverage by satellite (SMCS). The Coalition believes that Innovation, Science and Economic Development Canada (ISED) should implement policy, licensing, and technical frameworks that allow for the expansion of SMCS. This intervention is regarding consultation notice reference number SMSE-006-24. We appreciate the opportunity to provide input on this important matter.
2. Since 2013 the Canadian NG9-1-1 Coalition (“The Coalition”) has been an expert national forum to discuss and informally coordinate 9-1-1 services in Canada, to assist provincial and territorial decision makers and other stakeholders. The Coalition develops consensus amongst 9-1-1 stakeholders and advises on the potential path forward for NG9-1-1. The Coalition currently has over 60 members from across Canada representing Public Safety Answering Points (PSAPs), provincial and territorial governments, municipalities, and other interested 9-1-1 organizations.

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3. Individual Coalition members may be submitting responses directly to this consultation, but this submission represents the broad view of the Coalition as a whole.
4. We strongly advocate for any advancements to ensure 9-1-1 services can be reliably accessed across Canada, regardless of a user's mobile provider or geographical location. Calling 9-1-1 can be particularly difficult in remote areas with limited or no wireless coverage. Expanding SMCS in Canada could help 9-1-1 accessibility in these areas, which is a critical public safety requirement.
5. The Coalition believes enhancing mobile coverage by satellite, or any other means, will improve access to 9-1-1 and emergency first responders dispatched by PSAPs. This could greatly improve public safety in locations with poor or no existing wireless coverage.
6. Our coalition believes that SMCS could play a crucial role in enhancing public safety. We trust that ISED will continue to prioritize public safety as it evaluates the technical possibilities and limitations of SMCS for 9-1-1 access. We look forward to seeing the positive impact of these advancements in Canada.
7. The Coalition agrees with the statement in Paragraph 8 that "Mobile services should be available to all Canadians at home and on the go, and are essential for Canadians to access basic mobile services and emergency services such as 9-1-1."
8. As referenced in paragraphs 65 and 69, the Coalition feels that improved mobile wireless coverage in areas that have previously lacked access including roads and highways, and low population density areas would improve access to 9-1-1 and emergency services.
9. The Coalition has provided answers to the consultation questions that relate to 9-1-1. We did not answer questions outside of our expertise, for example those regarding technical specifications, or regulatory / legal implications. The answers to four specific questions are below:
10. *Question 9: ISED is seeking comments on the roles that SMCS and terrestrial mobile service expansion may play, as well as any potential limitations, in providing greater mobile service coverage to Canadians, including along roads and highways.*

- a. Coalition response: Many 9-1-1 calls originate from Canada's roads and highways for serious incidents such as motor vehicle collisions. Paragraph 8 of the consultation indicates that 14,036 km (12.3%) of major roads and highways in Canada do not have access to mobile wireless coverage as of 2022. This statistic is just related to "major roads and highways" and does not consider all the road infrastructure in Canada that would not be classified as "major." If a motor vehicle collision or other serious emergency occurs in an area without mobile wireless coverage, bystanders either must drive or walk away from the incident until they had adequate wireless coverage before they could call 9-1-1. This significantly delays emergency response. Paragraph 12 highlights the cost and feasibility challenges of building out additional terrestrial infrastructure to enhance wireless coverage in all major highways, sparsely populated areas, and other areas Canadians visit or work. The Coalition feels SMCS could supplement wireless coverage in areas of the country where terrestrial coverage does not or cannot feasibly exist.

11. Question 13: ISED is seeking comments on the technical possibilities and limitations of SMCS for the provision of 9-1-1 access to all handsets from all service providers where there is SMCS satellite coverage.

- a. Coalition response: The Coalition is requesting that three aspects be considered when designing technical specifications for 9-1-1 calls via SMCS in Canada. Future 9-1-1 calls processed by satellite coverage should:
 - i. Be processed via the Canadian Next Generation 9-1-1 network, known as the Emergency Services Internet Protocol network (ESInet). This ensures that 9-1-1 calls by satellite are appropriately prioritized, and can be transferred to other PSAPs.
 - ii. Go direct to the appropriate PSAP that serves the area of the emergency, instead of to a third-party call centre first. This saves critical minutes in answering 9-1-1 calls and dispatching first responders if required.
 - iii. Automatically come with location and phone number information. This will save critical time locating a caller,

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confirming a call back number and ultimately dispatching emergency responders, if required.

12. Question 15: ISED is seeking comments on whether existing mechanisms will support emergency communications in the absence of a roaming agreement between providers, or whether a new obligation would be appropriate regarding this issue for SMCS.

- a. Coalition Response: The Coalition members are not experts in the legal or regulatory realities of the roaming agreements that would be required. As referenced in paragraph 71, the Coalition feels that if a mobile 9-1-1 call cannot be transmitted by the subscriber's network, it should then be transmitted by another provider with coverage. SMCS could be a good solution in situations where terrestrial wireless services are unavailable. We agree with the statement in paragraph 71 that this would allow "any Canadian in need of assistance access to this critical service regardless of its provider." It is in the best interest of public safety for 9-1-1 calls to be processed automatically over another terrestrial, or satellite network if the subscriber's network is not connecting the caller to 9-1-1 services.

13. Question 29: ISED is seeking comments on any other considerations related to the introduction of SMCS in Canada which may not have been specifically addressed in this consultation.

- a. Coalition response: Expanding terrestrial coverage or implementing SMCS could be complex initiatives that could take many years to implement. In the meanwhile, the Coalition is hoping that other technical solutions such as wi-fi calling or texting by satellite (such as Apple's Emergency SOS feature) can be explored and expanded to enhance 9-1-1 access in Canada. While these technologies may have limitations, they can be shorter-term solutions to connect individuals to emergency responders in areas outside of mobile coverage. The ideal future is callers being able to make a voice 9-1-1 call in any area of the country where Canadians live, work, and travel. Eventually expanding satellite coverage in areas of Canada that do not or cannot have terrestrial mobile coverage could greatly improve 9-1-1 access.
- b. The Coalition also wants to emphasize that implementation of SMCS should be coordinated with CRTC Emergency Services

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working group (ESWG) to ensure both technical and operational requirements for end to end 9-1-1 call processing are properly established.

14. The Canadian NG9-1-1 Coalition would like to thank ISED for the opportunity to respond to this important matter.

15. The Coalition has designated myself, Andrew Renfree, as the representative for this consultation. I can be reached by email at andrew.renfree@gov.ab.ca or by mail at the address below:

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Sincerely,



Andrew Renfree
Chair, Canadian NG9-1-1 Coalition

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