



Telecom Decision CRTC 2025-291

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Application to review and vary Telecom Decision 2025-67 – Updated timeline for full transition to Next-Generation 9-1-1

Summary

9-1-1 is a bridge that connects Canadians to emergency services in times of need. Federal, provincial, territorial, and municipal governments, as well as telecommunications service providers (TSPs) all play a role in ensuring that Canadians can access 9-1-1 services. The Commission's role is to regulate the TSPs that connect 9-1-1 calls to 9-1-1 call centres.

Next-Generation 9-1-1 (NG9-1-1) is a new and improved 9-1-1 service. Once fully launched, NG9-1-1 will give Canadians and first responders tools that will provide quicker and more accessible communication during emergencies. The Commission acknowledges the importance of NG9-1-1 and will continue to support the transition within its mandate.

Because the transition to NG9-1-1 involves TSPs, the Commission has a role in setting a deadline for parties to be NG9-1-1 ready. In Telecom Decision 2025-67, the Commission revised the deadline to 31 March 2027, following extension requests by 9-1-1 stakeholders, including the Canadian Association of Chiefs of Police, the Canadian Association of Fire Chiefs, and the Paramedic Chiefs of Canada.

The Commission then received an application by Quebecor Media Inc. and Rogers Communications Canada Inc. to review and vary Telecom Decision 2025-67. The applicants claimed that there was a substantial doubt as to the correctness of the decision based on the rules of procedural fairness as well as the need to establish just and reasonable rates and incentives for the transition to NG9-1-1.

Based on the public record, the Commission finds that the applicants did not demonstrate a substantial doubt as to the correctness of Telecom Decision 2025-67. The Commission therefore declines to vary the deadline for parties to be NG9-1-1 ready.

Background

1. Next-Generation 9-1-1 (NG9-1-1) is a new and improved 9-1-1 service. Once fully implemented, NG9-1-1 will give Canadians and first responders tools that will provide quicker and more accessible communication during emergencies.

2. In Telecom Regulatory Policy 2017-182, the Commission established an NG9-1-1 policy framework and set an implementation deadline of 30 June 2023. The Commission determined that, during the transition period:
 - both the Enhanced 9-1-1 [E9-1-1] (legacy) networks and NG9-1-1 (Internet Protocol [IP]) networks would operate in parallel, with gateways in the NG9-1-1 networks used to convert the traffic between the legacy and IP networks; and
 - originating network providers (ONPs), which are the clients of the incumbent local exchange carriers (ILECs)¹ that operate E9-1-1 and NG9-1-1 networks, would be subject to those ILECs' wholesale tariff rates for both 9-1-1 networks. This is known as the dual-rate model.
3. In Telecom Decision 2021-199, the Commission extended the NG9-1-1 transition deadline to 4 March 2025 owing to complications caused by the COVID-19 pandemic.
4. In late 2023, the Commission received three applications from industry stakeholders, including the Canadian Association of Chiefs of Police, the Canadian Association of Fire Chiefs, and the Paramedic Chiefs of Canada, to extend the 4 March 2025 NG9-1-1 transition deadline. These applications were addressed through Telecom Decision 2025-67 (the Decision),² in which the Commission set a revised deadline for the transition to NG9-1-1 and maintained the existing E9-1-1 rates and the dual-rate model until NG9-1-1 is fully launched. The Decision ensures uninterrupted access to emergency services for Canadians, supports ongoing transition efforts, and minimizes financial impacts on telecommunication service providers (TSPs).

Application

5. On 29 April 2025, Quebecor Media Inc. and Rogers Communications Canada Inc. (the Applicants) submitted an application requesting that the Commission review and vary the Decision. They claimed that the Commission made errors of law and principle that give rise to a substantial doubt as to the correctness of the Decision.
6. In particular, the Applicants submitted that:

¹ Bell Canada, TELUS Communications Inc., and Saskatchewan Telecommunications are the three ILECs that operate 9-1-1 networks in Canada. They are commonly referred to as 9-1-1 network providers.

² The Decision was a result of three applications filed by various entities representing public safety answering points (PSAPs). They requested an extension to the deadline for decommissioning the E9-1-1 networks and to maintain the dual-rate model during the extended transition period for both E9-1-1 and NG9-1-1 networks. These entities listed a variety of challenges facing the PSAPs, including a lack of funding and access to readily available legacy PSAP gateways, delays with procuring new equipment, and limited resource availability for testing.

- the extension of the deadline in the Decision contravenes the rules of procedural fairness;
- the Decision does not comply with the statutory requirement to ensure that rates are just and reasonable;
- the Decision does not consider or establish credible incentives for public safety answering points (PSAPs) and ILECs to transition to NG9-1-1 that are consistent with the objectives identified by the Commission; and
- the Decision does not comply with the 2023 Policy Direction.³

7. The Applicants requested that the Commission:

- revise the date for implementing NG9-1-1 and decommissioning ILEC E9-1-1 networks to 4 March 2026, which was the maximum extension requested on the record of the proceeding;
- make the ILEC E9-1-1 tariffed rates interim immediately;
- direct the ILECs to submit new cost studies for their E9-1-1 services and/or reduce their E9-1-1 rates on a quarterly basis beginning on 1 June 2025 by the percentage amount of 9-1-1 call traffic that transits to PSAPs over NG9-1-1 in the ILEC's serving area or 25%, whichever is greater;
- clarify that the ILEC E9-1-1 tariff in a region served by an ILEC will cease to apply as soon as 98% or more of 9-1-1 traffic in that region is carried over NG9-1-1 service to NG9-1-1 PSAPs (as is, for example, expected for Saskatchewan by fall 2025); and
- direct the ILECs to submit, within three months of a decision in this proceeding, tariffs with terms and rates payable by PSAPs to receive E9-1-1 calls from the ILECs following 4 March 2026, effectively transferring E9-1-1 costs to PSAPs.

8. The Commission received interventions from the following parties: Bell Canada; Bragg Communications Inc., carrying on business as Eastlink (Eastlink); Cogeco Communications Inc. (Cogeco); Saskatchewan Telecommunications (SaskTel); TELUS Communications Inc. (TELUS); the Canadian NG9-1-1 Coalition; Coalition pour le service 9-1-1 au Québec (Coalition 9-1-1 Québec); Northern Communications Services, Inc. (Northern911); le Comité 9-1-1 du Syndicat canadien de la fonction publique au Québec (le Comité 9-1-1); and the Winnipeg Police Service (WPS).

³ *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, 10 February 2023.

Review and vary criteria

9. The Commission's framework for assessing review and vary applications is set out in Telecom Information Bulletin 2011-214. This is a well-established framework that contributes to regulatory certainty and predictability by allowing the Commission to revisit a past decision and make corrections for any errors, oversights, or changes in circumstances.
10. Based on the record before it, the Commission assesses whether there is a substantial doubt as to the correctness of the decision. If there is a substantial doubt, the Commission can consider varying a decision.
11. The Commission typically assesses whether an applicant has established a substantial doubt resulting from:
 - an error in law or in fact;
 - a fundamental change in circumstances or facts since the decision;
 - a failure to consider a basic principle which had been raised in the original proceeding; or
 - a new principle that has arisen as a result of the decision.

Issues

12. The Commission has identified the following issues to be addressed in this decision:
 - Did the Commission err in law and breach the rules of procedural fairness by extending the deadline for implementing NG9-1-1 and decommissioning the ILECs' E9-1-1 networks beyond the requested extension?
 - Did the Commission err in law or fail to consider a principle by failing to comply with the statutory requirement to ensure that rates are just and reasonable?
 - Did the Commission err in law or fail to consider a principle by failing to consider or establish credible incentives for PSAPs and ILECs to transition to NG9-1-1 that are consistent with the objectives identified by the Commission?

Did the Commission err in law and breach the rules of procedural fairness by extending the deadline for implementing NG9-1-1 and decommissioning the ILECs' E9-1-1 networks beyond the requested extension?

Positions of parties

The Applicants

13. The Applicants submitted that in the proceeding leading to the Decision (the proceeding), a maximum extension of one year was requested. The Applicants alleged that the Commission's decision to grant a two-year extension breached the rules of procedural fairness in two ways:

- The parties to the proceeding were not notified or given an opportunity to comment on the possibility of a two-year deadline extension.
- The decision to extend the deadline by two years was based on a CRTC Interconnection Steering Committee (CISC) Emergency Services Working Group (ESWG) status report⁴ that was not on the record of the proceeding, and parties had no opportunity to comment on and challenge the forecast included in the status report.

Interveners

14. Both Cogeco and Eastlink supported the Applicants' request.

15. With respect to the first issue of whether parties to the proceeding were notified or given an opportunity to comment on the possibility of a two-year deadline extension, Bell Canada pointed out that the parties who submitted the original request for a deadline extension to March 2026 acknowledged that certain PSAPs may require time beyond that deadline to fully transition to NG9-1-1.

16. Additionally, le Comité 9-1-1 highlighted that interveners from the proceeding, including Bell Canada and Coalition 9-1-1 Québec, had stated in their interventions that they would support an extension of more than one year.

17. With respect to the second issue regarding the ESWG report, the Canadian NG9-1-1 Coalition noted that the Applicants are regular and active ESWG participants, and that no objections were raised by them regarding the ESWG report's estimated timeline for full NG9-1-1 implementation prior to the report's approval.

18. Furthermore, multiple interveners, including non-TSPs and NG9-1-1 network providers, submitted that in making its determinations, the Commission did not solely rely on the ESWG report to set the updated deadline. Instead, they note a range of

⁴ The ESWG filed status report [ESRE0109](#) with CISC, and it was approved on 28 January 2025. The report outlines the status of and key considerations for the PSAPs' transition.

information that informed the Decision, including information and data available at the time of submissions, such as PSAP migration status reports, public safety requirements, technical and resource constraints, and implementation challenges faced by PSAPs and ILECs.

Commission's Analysis

19. With respect to the question of notice and the opportunity to comment on the two-year extension granted by the Commission, the issue before the Commission in the proceeding was whether to extend the NG9-1-1 implementation deadline. The Commission heard from all parties on that issue.
20. With respect to the question of the Commission recognizing the ESWG status report, the Commission notes that all ESWG participants, including the Applicants, were able to participate in developing, commenting on, and reviewing the report prior to its formal approval.
21. Furthermore, the ESWG status report was one in a series of publicly available reports that the Commission requested in Telecom Regulatory Policy 2017-182 and Telecom Decision 2021-199 to inform on the deployment and readiness status of NG9-1-1. The Commission was therefore entitled to take notice of the public report when determining the appropriate deadline extension.
22. In light of the above, the Commission finds that it did not breach its procedural fairness obligations by extending the deadline for the implementation of NG9-1-1 and the decommissioning of the ILECs' E9-1-1 networks beyond the requested extension.

Did the Commission err in law or fail to consider a principle by failing to comply with the statutory requirement to ensure that rates are just and reasonable?

Positions of parties

The Applicants

23. The Applicants indicated that the Commission must ensure that rates for telecommunication services remain just and reasonable. The Applicants claimed that the Commission extended the dual-rate model without giving due consideration to whether maintaining existing E9-1-1 rates was just and reasonable.
24. The Applicants further stated that the Commission's analysis of whether existing E9-1-1 rates should apply was based on past ILEC assertions and outdated determinations by the Commission that did not address current cost realities or stakeholder evidence.
25. The Applicants submitted that the Commission failed to ensure just and reasonable rates in past determinations by freezing E9-1-1 rates, deeming short-term dual rates manageable, and repeating ILECs' statements about how they will likely have to

make capital investments in their E9-1-1 networks. The Applicants added that E9-1-1 per network access service rates have been declining and emphasized that the Commission acknowledged in Telecom Regulatory Policy 2017-182 that the dual-rate model would not be sustainable over a long period of time.

26. The Applicants stated that E9-1-1 traffic is declining as more ONPs and PSAPs transition to NG9-1-1, and that costs for operating E9-1-1 networks are decreasing with no evidence of significant new capital costs.

Interveners

27. Both Cogeco and Eastlink supported the Applicants' submissions on this issue. Cogeco submitted that maintaining existing rates for the transition period means that rates are not just and reasonable.
28. Several interveners, including non-TSPs and NG9-1-1 network providers, submitted that the absence of gateways that would enable legacy PSAPs to continue using E9-1-1 networks during their transition requires both E9-1-1 and NG9-1-1 networks to operate in parallel as long as a PSAP remains on an E9-1-1 network. Consequently, the dual-rate model is required to fund both 9-1-1 networks until PSAPs fully transition to NG9-1-1 networks.
29. TELUS claimed that the Applicants did not provide evidence that the dual-rate model is unjust or unreasonable. TELUS submitted that the initial extension request that led to the Decision did not include a request to review current E9-1-1 rates, and any adjustments to the specific rates charged under the dual-rate model fall outside the scope of the current review and vary application.
30. Bell Canada submitted that the steady decline of E9-1-1 rates, which will almost certainly continue during the transition period, was anticipated and reflected in previous decisions by the Commission, including Telecom Regulatory Policy 2017-182, Telecom Decision 2023-314, and the Decision. In all three of these decisions, the Commission upheld the dual-rate model and did not re-examine E9-1-1-related costs as the transition was underway.
31. Several interveners, including non-TSPs and NG9-1-1 network providers, submitted that conducting cost studies on E9-1-1 systems would be inefficient given that they will soon be decommissioned.
32. Le Comité 9-1-1 claimed that the wording in the Decision was less clear than that in Telecom Regulatory Policy 2017-182 and Telecom Decision 2021-199. It therefore sought confirmation from the Commission on whether the dual-rate model will cease to apply in the operating territory of an ILEC as soon as all ONPs and PSAPs have completed their NG9-1-1 migration in that territory.
33. The Applicants responded that current E9-1-1 rates are inflated and have been set to compensate ILECs for equipment that will no longer be required after the transition to NG9-1-1 is complete. They therefore claimed that E9-1-1 rates are unjust and

unreasonable because they overcompensate ILECs. The Applicants added that the recent decrease in E9-1-1 rates reflects an increase in the number of telephone numbers that are subject to the rate rather than improvements in operational efficiency or declining traffic. The Applicants submitted that if ILECs were not being overcompensated, they would have submitted revised cost studies to request rate increases.

Commission's analysis

34. The arguments presented by the Applicants regarding whether the dual-rate model is just and reasonable were considered by the Commission in the original Decision. There, the Commission highlighted that E9-1-1 rates have been steadily decreasing and are expected to continue decreasing throughout the extended transition period. As an example, the Commission noted that Bell Canada submitted that its monthly E9-1-1 rate for each 9-1-1-capable line in Quebec has decreased by almost 40% from 2017 (\$0.13) to 2024 (\$0.08).
35. In light of the above, the Commission finds that it did not err in law or fail to consider a principle in the Decision by failing to comply with the statutory requirement to ensure that rates are just and reasonable.
36. Additionally, in response to le Comité 9-1-1's request to confirm the application of the dual-rate model, the Commission confirms that the existing E9-1-1 rates and dual-rate model will remain in place until existing E9-1-1 networks are decommissioned by the 31 March 2027 deadline or earlier if all the TSPs and PSAPs in an ILEC's operating territory have completed their transition to NG9-1-1.

Did the Commission err in law or fail to consider a principle by failing to consider or establish credible incentives for PSAPs and ILECs to transition to NG9-1-1 that are consistent with the objectives identified by the Commission?

Positions of parties

The Applicants

37. The Applicants claimed that the Decision did not establish incentives for a timely and cost-effective transition. Although the Commission cannot regulate PSAPs directly, the Applicants claimed that the Commission can set tariffed E9-1-1 rates for PSAPs using legacy ILEC networks. These tariffs could serve as financial incentives for ILECs to support PSAPs to transition by the Applicants' proposed deadline of 4 March 2026. The Applicants added that the Commission could pre-emptively introduce PSAP tariffs to offset any potential under-recovery of costs by ILECs if payments by ONPs and end-customers to ILECs are reduced during the extended transition period.
38. The Applicants also submitted that there are workarounds for PSAPs that do not migrate to NG9-1-1 on a timely basis, such as consolidating those PSAPs and outsourcing their traffic to third-party call answering services like Northern911.

39. The Applicants added that the Decision contravenes the 2023 Policy Direction because it fails to minimize financial impacts on TSPs or incentivize timely PSAP transitions. The Applicants stated that the Decision prolongs the dual-rate model without considering how it may impact policy goals such as affordability, efficiency, and competition.

Interveners

40. The Canadian NG9-1-1 Coalition submitted that PSAPs are highly incentivized to meet the NG9-1-1 transition deadline. It added that the lack of viable legacy gateway solutions could result in degraded service or the need to outsource call handling if the transition deadline is missed.

41. The WPS called the Applicants' view that PSAPs must be offered incentives to transition on a timely basis unfair and misrepresentative of PSAPs' efforts. It submitted that delays are caused by factors beyond PSAPs' control, such as vendor capacity and scheduling constraints.

42. SaskTel submitted that there is in fact an incentive for all PSAPs to meet the deadline, which is NG9-1-1's ability to enable faster emergency responses.

43. Bell Canada submitted that other parties' submissions along with the Commission's own analysis demonstrate that the Commission did consider incentives in the Decision.

44. TELUS opposed the Applicants' claim that the Decision lacked incentives and submitted that such a claim misrepresents the Decision and ignores the complexity of nationwide upgrades of emergency service networks. TELUS added that the Commission already required PSAPs to submit comprehensive transition plans, which serve as incentives.

Commission's analysis

45. Although the Commission is not legally required to consider or establish incentives for PSAPs and ILECs to transition to NG9-1-1 networks, the Commission took into account the importance of avoiding further delays to the deployment of the NG9-1-1 system and established several measures within its jurisdiction to further assist PSAPs with their transition.

46. Specifically, the Commission requested that the Canadian Association of Chiefs of Police, the Canadian Association of Fire Chiefs, and the Paramedic Chiefs of Canada provide a comprehensive NG9-1-1 transition plan with details on how their respective PSAPs will meet the new deadline and what alternative arrangements their PSAPs will prepare to process NG9-1-1 calls in case they do not meet that deadline. Additionally, the Commission requested that the ESWG provide progress reports on the transition to NG9-1-1 networks on a semi-annual basis until all E9-1-1 networks are decommissioned.

47. Regarding the Applicants' claim that the Decision does not comply with the Policy Direction, while the Applicants explain the ways in which they believe that the Decision is inconsistent with the Policy Direction, they do not tie their claim to a specific error in law or fact. As such, the Applicants' submissions on this point do not raise a substantial doubt as to the correctness of the Decision.
48. The Commission therefore finds that it did not err in law or fail to consider a principle by failing to consider or establish credible incentives for PSAPs and ILECs to transition to NG9-1-1 networks.

Conclusion

49. In light of all of the above, the Commission denies Quebecor Media Inc. and Rogers Communications Canada Inc.'s application to review and vary the Decision.

Secretary General

Related documents

- *Various applicants – Updated timeline for full transition to Next-Generation 9-1-1*, Telecom Decision CRTC 2025-67, 28 February 2025
- *Bell Canada and Quebecor Media Inc. – Applications regarding fees for enhanced 9-1-1 and next-generation 9-1-1 services*, Telecom Decision CRTC 2023-314, 11 September 2023
- *Establishment of new deadlines for Canada's transition to next-generation 9-1-1*, Telecom Decision CRTC 2021-199, 14 June 2021
- *Next-generation 9-1-1 – Modernizing 9-1-1 networks to meet the public safety needs of Canadians*, Telecom Regulatory Policy CRTC 2017-182, 1 June 2017, as amended by Telecom Regulatory Policy CRTC 2017-182-1, 28 January 2019
- *Revised guidelines for review and vary applications*, Telecom Information Bulletin CRTC 2011-214, 25 March 2011