



Telecom Decision CRTC 2025-317

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Gatineau, 27 November 2025

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Improving 9-8-8 routing

Summary

9-8-8 provides anyone in Canada with bilingual, trauma-informed, and culturally appropriate support for mental health crisis and suicide prevention. The service is free and is available 24 hours a day, 7 days a week, year-round.

The Public Health Agency of Canada oversees funding and administration of the [9-8-8: Suicide Crisis Helpline](#), and the service is delivered by the Centre for Addiction and Mental Health (CAMH). The Commission is responsible for directing telecommunications service providers to make the necessary network modifications to implement 9-8-8 and any subsequent improvements.

When someone calls or texts 9-8-8, they should be connected to the nearest local response centre. CAMH requested the Commission's assistance in improving 9-8-8 routing. Accordingly, on 27 January 2025, the Commission issued Telecom Notice of Consultation 2025-20.

A majority of parties to the proceeding recommended taking a collaborative approach to developing an improved routing method. Based on the record of the proceeding, the Commission agrees that a collaborative approach would be the fastest and most efficient way to improve 9-8-8 routing.

Accordingly, the Commission requests that the CRTC Interconnection Steering Committee Network Working Group provide the Commission with recommendations on possible methods to improve 9-8-8 routing within six months.

Background

1. 9-8-8 is an important free service available to anyone in Canada seeking immediate support for mental health crises and suicide prevention.
2. Since the launch of 9-8-8, the Public Health Agency of Canada and the Centre for Addiction and Mental Health (CAMH) have noted that the current routing method

uses the caller's phone number area code to determine which of the nearly 40 response centres receives the call or text.¹

3. Since Canadians can keep their phone number when they move,² and because they often travel with their mobile phones, a caller's phone number does not necessarily correspond to their physical location. For example, when a caller in Vancouver dials 9-8-8 from a phone number with a Toronto area code, they are connected to a response centre in Toronto rather than Vancouver.
4. The current call routing method can impact response centres' ability to connect callers with local emergency services and resources. A local centre is typically better able to meet the needs of the communities it serves.
5. CAMH proposed a routing method to more accurately route calls while also improving the resiliency of the 9-8-8 network. The Commission gathered views on the feasibility and efficiency of this method through a public consultation.

The proceeding

6. On 27 January 2025, the Commission published Telecom Notice of Consultation 2025-20, seeking comments on how to improve the routing of 9-8-8 calls and texts. The Commission gathered views on several issues, including CAMH's proposed routing method, potential alternative solutions, implementation timelines and costs, privacy implications for end-users, and technical considerations.
7. The Commission received interventions from Bell Canada; Bragg Communications Inc., carrying on business as Eastlink (Eastlink); Quebecor Media Inc. (Quebecor); Rogers Communications Canada Inc. (Rogers); Saskatchewan Telecommunications (SaskTel); TBayTel; TELUS Communications Inc. (TELUS); the Canadian Telecommunications Association (CTA); the VON [Voice on the Net] Coalition; the Public Interest Advocacy Centre (PIAC); the Canada Deaf Grassroots Movement (CDGM), the Canadian Administrator of VRS (CAV), Inc. (CAV), the Deaf Wireless Canada Consultative Committee (DWCC);³ Eversa; the Vancouver Coastal Health Deaf Well-Being Program (WBP); and Northern Communications Services, Inc. (Northern911).

¹ The numbering plan area, often referred to as the area code, refers to the first three digits of a ten-digit phone number and is geographically assigned based on the corresponding numbering plan area.

² This is possible under the Commission's [number portability rules](#).

³ After the close of the reply period for the proceeding, the Commission received a procedural request from the DWCC to include a public petition document and three American Sign Language (ASL) and Langue des signes québécoise (LSQ) videos in the record of the proceeding. Since these submissions do not prejudice other parties to the proceeding, the Commission accepts the DWCC's procedural request to include these submissions as part of the public record.

Issues

8. The Commission has identified the following issues to be addressed in this decision:
 - the feasibility of CAMH's proposed routing method;
 - the feasibility of alternative proposed routing methods; and
 - an alternative approach to identifying an appropriate routing method that leverages the CRTC Interconnection Steering Committee (CISC) Network Working Group.

The feasibility of CAMH's proposed routing method

9. CAMH proposed a routing method using Direct Inward Dialing (DID)⁴ and location routing numbers (LRNs)⁵ to route calls to the nearest response centre based on where the caller is physically located.
10. CAMH indicated that this method would also improve routing for calls placed from blocked numbers and the overall resilience of the 9-8-8 network.
11. For implementation, CAMH proposed a phased approach, over a six- to eight-month period.

Positions of parties

12. Bell Canada, Eastlink, Quebecor, Rogers, SaskTel, and TELUS did not support the implementation of CAMH's proposed routing method.
13. Eastlink and SaskTel indicated that CAMH's proposed routing method would not work on their networks. Eastlink noted that CAMH's proposal assumes that providers have local switches in each region or province to route calls, which is not the case for all providers. Further, SaskTel submitted that any calls made from a SaskTel Voice over long-term evolution (VoLTE) wireless device, regardless of where in the world the user is located, must be steered to its wireless switch in Saskatchewan. Therefore, the LRN for these calls would be associated with Saskatchewan.
14. Northern911, Quebecor, and Rogers also outlined this proposal's limitations to accurately route wireless calls. For example, they noted that the LRN of a switch does not always represent the location of the end-user. Further, Quebecor submitted

⁴ DID numbers are phone numbers that allow customized and systematic call routing.

⁵ An LRN is a 10-digit number used to uniquely identify a switch. Under CAMH's proposed routing method, calls would be routed based on the LRN of the carrier's switch receiving the incoming call.

that a caller could travel to another province while still being connected to the same LRN, which could result in inaccurate 9-8-8 routing.

15. Bell Canada and TELUS submitted that CAMH's proposed routing method would not be the most efficient solution. They noted that this is due to (i) the complexity of implementation because their networks would require significant changes for LRNs and DIDs to be introduced for 9-8-8 routing, and (ii) the proposal's anticipated costs.
16. Many parties indicated that the implementation timeline would likely be longer than six to eight months, as CAMH proposed, and that it would be costly to implement for telecommunications service providers (TSPs).

Commission's analysis

17. The submissions of most TSPs highlighted significant concerns with using DID numbers and LRNs to route 9-8-8 calls to the closest response centre. They cited technical and network design limitations, especially with respect to wireless numbers. Several TSPs added that CAMH's proposed routing method would lead to considerable implementation costs.
18. Based on the information on the record of this proceeding, the Commission considers that CAMH's proposed routing method may not be the most appropriate way to improve 9-8-8 routing.

The feasibility of alternative proposed routing methods

19. In Telecom Notice of Consultation 2025-20, the Commission invited proposals for alternative methods that could improve 9-8-8 routing.
20. Bell Canada, the CDGM, Quebecor, Rogers, and TELUS each submitted proposals for alternative routing methods.

Positions of parties

21. Bell Canada proposed a routing method using the toll-free 1-8XX number to which 9-8-8 calls are currently routed. Under this proposal, when someone calls 9-8-8, the charge number⁶ associated with the cell tower where the call is made is sent to the 9-8-8 service provider, along with the call. The 9-8-8 service operator could then interpret the charge number and route the call to the appropriate response centre based on the location of the cell tower.

⁶ A charge number is information sent by Bell Canada as part of the call information to identify the tower where a call is made, which it uses for toll-charging purposes.

22. Bell Canada also proposed a routing method that relies on a routing protocol for calls to N-1-1 numbers,⁷ where wireless calls would be routed via cell tower location.
23. Rogers supported Bell Canada's two proposals, noting that they are both simple routing alternatives that readily exist. Eastlink, however, indicated that Bell Canada's proposals would not be viable for Eastlink because it does not send charge number information on calls in all cases.
24. The CDGM proposed a method where the call would be routed to the closest response centre using the real-time location of the caller via cell towers, GPS, or Wi-Fi data.
25. Quebecor proposed to use the Session Initiation Protocol (SIP)⁸ P-Access-Network-Info header, which contains the Tracking Area Code (TAC).⁹ TACs are assigned to geographic areas and could be coupled with DIDs as per CAMH's proposed routing method. Quebecor indicated that this method is similar to the process that takes place for calls to 3-1-1.
26. Rogers proposed mimicking how calls to N-1-1 numbers are routed over wireless networks, linking each TSP's cell sites to the appropriate response centre. Rogers recognized that its proposed routing method would require all TSPs to implement detailed routing tables in their switches, which would risk routing errors.
27. Eastlink expressed concerns over Rogers' method because it would be difficult to accurately route VoLTE calls based on the constantly changing cell site data of its roaming partners, resulting in a heightened risk of routing errors.
28. TELUS proposed using an existing GR-394¹⁰ routing protocol, where the location information provided is not the area code attached to the device but rather the area code specific to the location from which the call originated. TELUS noted that costs would apply only to the 9-8-8 service operator, and TSPs would not have to modify their networks to implement this method.

⁷ N-1-1 numbers are unique three-digit codes assigned to provide specific types of service, the majority of which serve the broad public interest.

⁸ SIP is a modern and more flexible protocol that is used for exchanging signalling messages between networks of TSPs to facilitate call functions for a variety of real-time communication sessions (including voice calls, video, and messaging) over newer Internet Protocol-based networks.

⁹ A TAC identifies cell towers in a particular area.

¹⁰ GR-394 is a protocol that facilitates the exchange of signalling messages between the networks of TSPs. It is primarily used for voice call signaling in traditional telecommunications networks.

29. Rogers submitted that TELUS's proposed method is technically feasible. However, Eastlink opposed TELUS's proposed solution because it does not support modern infrastructure, such as SIP interconnection.

Commission's analysis

30. The routing methods proposed by Bell Canada, the CDGM, Quebecor, and Rogers all rely on sharing cell site location data with TSPs. However, cell site information is always changing as TSPs regularly make adjustments to their networks. It can take time for these updates to be received and reflected in each TSP's system. This added layer of complexity could lead to increased routing errors and may not provide a uniform 9-8-8 experience for callers. In addition, these proposed routing methods would be significantly more complex to implement for smaller or regional TSPs that rely on roaming services.
31. TELUS's proposed routing method was identified as feasible by most parties, and it has the benefit of only requiring modifications to the 9-8-8 service operator's network. However, the Commission considers that this proposed routing method may only provide a short-term solution, because GR-394 is an older protocol, used primarily for voice call signaling in traditional telecommunications networks. Current trends suggest that the telecommunications industry is gradually transitioning to SIP interconnection, which would not support GR-394 over the long term.
32. While Quebecor's proposed routing method relies on SIP interconnection, it has limitations. In particular, when a caller uses a partner network while roaming, the originating operator does not have the necessary TAC information to determine the caller's location to route the call to the closest response centre.
33. The Commission considers that the proposed alternative routing methods all have various limitations, including increased risk of routing errors and incompatibility with some TSPs' networks. The Commission is of the view that the appropriate routing method, or combination of routing methods, must account for all TSPs' networks, and that this outcome is best achieved through all TSPs working in collaboration with CAMH.

An alternative approach to identifying an appropriate routing method that leverages the CISC Network Working Group

Positions of parties

34. Bell Canada, the CTA, Eastlink, Northern911, PIAC, Quebecor, Rogers, SaskTel, TBayTel, and TELUS called for a more collaborative approach between CAMH and TSPs to improve 9-8-8 routing.
35. TELUS noted that a collaborative approach would be most appropriately facilitated through the CISC Network Working Group.

36. TBayTel submitted that a collaborative approach to addressing the concerns raised by CAMH would be more practical and ultimately more beneficial because CAMH could work and consult directly with TSPs.
37. The CTA submitted that, for the introduction of 9-8-8, TSPs collaborated closely with CAMH to ensure that requirements were fully identified and understood by all parties, and that the service would be delivered in the most efficient and effective manner possible. The CTA indicated its interest in reviewing the potential methods put forward with other TSPs to determine how methods could best be implemented.
38. Eastlink submitted that the best way to identify and resolve any issues with the 9-8-8 system is through a collaborative approach between CAMH and TSPs. Eastlink added that because TSPs vary in size, technologies, and capabilities, the methods that may be viable for TSPs with national networks may not work for smaller or regional TSPs.
39. CAMH submitted that if an additional process is required, it is open to discussions and collaboration with the Commission and TSPs to find the most effective and sustainable method.

Commission's analysis

Collaborative approach through the CISC Network Working Group

40. CISC's mandate is to undertake tasks related to technological, administrative, and operational issues on matters assigned by the Commission. CISC working groups are open to anyone, and participation is voluntary.
41. The Commission considers that the most efficient way forward would be to refer this matter to the CISC Network Working Group. The CISC Network Working Group would provide a formal structure to promote effective collaboration between CAMH and TSPs with support from Commission staff.

Issues to be addressed in the CISC Network Working Group

42. To achieve a timely and appropriate outcome, the Commission considers that it should give detailed directions to the CISC Network Working Group. On the record of this proceeding, the Commission worked with CAMH to identify the primary issues that require resolution.
43. CAMH submitted that the primary issues requiring resolution are (i) the challenges related to routing based on the caller's location; (ii) the handling of wireless calls, including blocked wireless calls; and (iii) improving the resiliency of the 9-8-8 network. CAMH is also seeking a routing method that can accommodate adding or removing response centres and updating their geographic coverage.
44. CAMH submitted that wireless calls present the most significant routing challenges because the area code of a wireless number may not correspond to the area where

the caller is physically located. Parties noted that wireline calls are generally routed to the closest response centre.

45. Regarding blocked wireless calls, CAMH submitted that all calls from blocked numbers are currently directed to a national response centre. These calls may therefore not be routed to the response centre nearest to the caller's location.
46. With respect to the resiliency of the 9-8-8 network, CAMH submitted that the current toll-free call routing system creates a single point of failure that leaves the system vulnerable to outages. CAMH emphasized that any interruption to the 9-8-8 service could have life-threatening consequences for those in crisis.
47. Regarding the need for flexible updates to response centre coverage, CAMH submitted that it has processes in place to ensure that its geographic coverage is continuously managed and up to date, and that it requires a routing method that can accommodate ongoing updates.
48. In addition to the issues identified by CAMH, the Commission considers that any proposed routing method should be compatible with current technologies in 4G and 5G mobile wireless networks and require minimal modifications to wireless networks.
49. The Commission notes that parties emphasized the importance of maintaining the privacy determinations made in Telecom Regulatory Policy 2022-234. In that regulatory policy, the Commission indicated that automatically accessing a caller's dispatchable location data may dissuade certain individuals from using the 9-8-8 service. It remains important for callers to access 9-8-8 anonymously. The Commission therefore considers that these privacy determinations must be upheld.
50. Regarding the period of time provided to the CISC Network Working Group to submit a report to the Commission, the Commission must balance the need to improve 9-8-8 routing in a timely manner, while also allowing the working group sufficient time to deliberate and complete the task. The Commission considers that a six-month period would be appropriate.
51. Finally, the Commission acknowledges the issues raised by Deaf, Deaf-Blind, and Hard of Hearing organizations regarding the accessibility of 9-8-8 services, specifically their request for direct video calling and more training for crisis responders on accessibility needs. The Commission does not have jurisdiction over mental health crisis and suicide prevention services, nor the organizations that provide them. CAMH has indicated that it is committed to working with Deaf, Deaf-Blind, and Hard of Hearing organizations to determine how to incorporate direct video calling into the service and to make improvements that will support the Deaf, Deaf-Blind, and Hard of Hearing communities.

Conclusion

52. In light of all of the above, the Commission requests that the CISC Network Working Group provide the Commission by **27 May 2026** with recommendations on a routing method (or a combination of routing methods) that:

- improve the routing of wireless calls to 9-8-8, including blocked wireless calls;
- improve the resiliency of the 9-8-8 network;
- ensure compatibility with current technologies in 4G and 5G mobile wireless networks and require minimal modifications to wireless networks;
- can accommodate adding or removing response centres from the 9-8-8 system and modifying their geographic coverage; and
- maintain the existing privacy determinations made in Telecom Regulatory Policy 2022-234.

Secretary General

Related documents

- *Call for comments – Improving the routing of 9-8-8 calls and texts*, Telecom Notice of Consultation CRTC 2025-20, 27 January 2025, as amended by Telecom Notice of Consultation CRTC 2025-20-1, 7 March 2025
- *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, as amended by Telecom Regulatory Policy CRTC 2022-234-1, 9 December 2022