

IMPLEMENTATION OF LOCAL COMPETITION

CRTC INTERCONNECTION STEERING COMMITTEE

REPORT to the CRTC

by

INDUSTRY WORKING GROUP

Emergency Services (9-1-1) Working Group

TIF 39 Consensus Report - DRAFT

TITLE: Customer Notification Issues re: 9-1-1 Calls on VoIP

DATE: July 21, 2005

IMPLEMENTATION OF LOCAL COMPETITION

Consensus Report to the CRTC

Task ID(s): ESTF039

Task Name(s): Customer Notification Issues re 9-1-1 Calls on VoIP

Task Description: To develop standard notifications to customers regarding any limitations that may exist with respect to 9-1-1/E-9-1-1 service on local VoIP service (as directed in paragraph 95 of Telecom Decision CRTC 2005-21) and to identify all related issues, including the method of conveyance of such notifications to customers, the timetable for implementation of the standard notifications, and the requirement to obtain express consent from customers in respect of such notifications.

Introduction: This report addresses the directive given to the ESWG in Telecom Decision CRTC 2005-21 at paragraph 95.

Conclusion: The ESWG has reached consensus on the notification issues outlined in this report and recommends that they be adopted by the Steering Committee and subsequently accepted by CRTC.

1. In Telecom Decision CRTC 2005-21, the Commission issued the following directives:

93. Accordingly, the Commission **directs** all Canadian carriers offering local VoIP services to provide initial customer notification, regarding any limitations that may exist with respect to 9-1-1/E9-1-1 service, before service commencement. This information is to be made available through all of the following: marketing material used for television, radio and printed media, the terms and conditions of service, on-line material, customer service representatives, service contracts and starter kits.

94. The Commission further **directs** all Canadian carriers offering local VoIP service to provide on-going customer notification during service provision through all of the following: marketing material used for television, radio and printed media, the terms and conditions of service, on-line material, customer service representatives, warning stickers affixed to telephone sets and billing inserts.

95. The Commission requests CISC to develop standard notifications, for the implementation of this requirement and report back to the Commission within 60 days from the date of this Decision.

98. In cases where there are limitations on VoIP 9-1-1/E9-1-1 service, the Commission **directs** Canadian carriers offering local VoIP services to obtain, prior to commencement of service, the customer's express consent, by which the customer acknowledges his/her understanding of the 9-1-1/E9-1-1 service limitations, using one of the methods approved in Decision [2005-15](#). To ensure that information regarding limitations on 9-1-1/E9-1-1 service is accessible to persons with visual disabilities, all customer notification, and any printed information used to secure the express customer consent, must be provided in alternative formats (e.g., Braille and large print), upon request. Furthermore, to ensure that such documentation is accessible to persons with cognitive disabilities, local VoIP service providers are required, at a minimum, to explain it, upon request.

99. The Commission **directs** all Canadian carriers, as a condition of providing telecommunications services to local VoIP service providers, to include in their service contracts or other arrangements with these service providers, the requirement that the latter abide by the directions set out in paragraphs 93, 94 and 98.

2. Further to the Commission's request to the CISC, the ESWG established a sub-working group and opened TIF 39, Customer Notification Issues re: 9-1-1 Calls on VoIP.
3. Consistent with the Commission's objective in paragraph 93 that standard notifications should be developed where there are limitations on VoIP 9-1-1/E9-1-1 service, the ESWG makes the following recommendations.
4. All local VoIP service providers shall, where applicable, provide their customers and potential customers with information which outlines the availability, characteristics and limitations of the service provider's VoIP 9-1-1 service in Canada, all in accordance with the following provisions. All local VoIP service providers shall also provide their customers, as appropriate to the service and the communications medium used, user tips to remember when calling 9-1-1 from a VoIP phone.
5. The information provided by a VoIP service provider to outline the availability, characteristics and limitations of the service provider's VoIP 9-1-1 service in Canada must meet at a minimum, the first and, as appropriate in relation to the communications medium used, the remaining consumer notification objectives listed below:
 1. VoIP 9-1-1 service has certain limitations relative to Enhanced 9-1-1 service that is available on most traditional telephone service;
 2. the circumstances in which 9-1-1 service would or would not be available;
 3. the nature of the 9-1-1 service that is provided and on what conditions;
 4. material differences between the 9-1-1 service that is provided and traditional E9-1-1 service;
 5. measures that should be taken by a 9-1-1 caller as a result of such differences;
 6. the obligation of the subscriber to the VoIP service to inform all users and potential users of the VoIP service of the nature and limitations of the 9-1-1 service; and
 7. applicable limitations of liability.
6. Consistent with the directives issued by the Commission in paragraphs 93 and 94, the ESWG recommends that customer notifications for VoIP 9-1-1 service should be provided in each of the following forms of communications that the VoIP service provider may employ with actual or potential customers in its normal course of business:

1. Marketing (including television, radio, printed media, and on-line material)
 2. Point of Sale (including scripts used by sales personnel responsible for service activation, websites, customer service agreements, and terms of service)
 3. Service Implementation (including starter kits, installation software and telephone set stickers)
 4. Other Ongoing Notification
7. Each VoIP service provider shall be responsible to develop its own language for the user tips to reflect the characteristics of its service. The user tips could include, but need not be necessarily limited to, the following topics:
- VoIP 9-1-1 service has certain limitations relative to Enhanced 9-1-1 service that is available on most traditional telephone service;
 - to be prepared to confirm your location and call-back number with the operator who answers the 9-1-1 call since the operator may not have this information;
 - that 9-1-1 service may not be available during a power outage and will be unavailable during a broadband Internet outage;
 - the necessity of ensuring that your location information is kept current with your VoIP service provider since the operator may assume that you are at the last registered address if you are not able to speak during a 9-1-1 call;
 - to not hang up until told to do so, and to call back if you get disconnected; and
 - to ensure that you understand any 9-1-1 limitations of your VoIP service and that you make all other potential users of the service aware of these limitations.
8. Each VoIP service provider must communicate the customer notification objectives in paragraph 5 and the user tips in paragraph 7 to customers or potential customers to at least the following extent in respect of each of the forms of communications in paragraph 6 that it employs in its normal course of business:

Table 1. Summary table of minimum requirements associated with customer notification of VoIP 911 service limitations

Form of Communication	Medium	Minimum Requirements
Marketing	Television	Item 1 of para. 5
	Radio	Item 1 of para. 5
	Printed Media	Item 1 of para. 5
	On-line material	Item 1 of para. 5
Point of Sale	Scripts used by sales personnel responsible for service activation	Staff must be able to communicate user tips and items 1-7 of para. 5
	Websites	User tips and items 1-7 of para. 5
	Customer service agreements	Items 1-7 of para. 5
	Terms of service	Items 1-7 of para. 5
Service Implementation	Starter kits	User tips and items 1-7 of para. 5
	Installation software	User tips and items 1-7 of para. 5
	Telephone set stickers	Item 1 and/or item 5 of para. 5

Each VoIP service provider must communicate the customer notification objectives in paragraph 5 and the user tips in paragraph 7 to its existing customers at least once per 12 month period.

These are minimum requirements only, and a VoIP service provider may elect to use the forms of communication for additional customer notification objectives.

9. Standard notifications must provide clearly visible and readily accessible information, given in language that is simple and user-friendly. The VoIP service provider shall be responsible to develop its own language to reflect the unique limitations applicable to any given VoIP service for which subscriber notification is required to be provided in accordance with the Commission's directives in Decision 2005-21. The actual language used should reflect the circumstances in which the

notification is being provided. For example, since television and radio advertisements are measured in seconds, the notifications provided in such messages may be very succinct.

10. Once the Commission approves these recommendations, the ESWG proposes that the Commission establish an implementation date of 90 days following Commission approval of this Consensus Document.

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