

February 15, 2022

Honourable Mike Farnworth  
Minister of Public Safety and Solicitor General  
PO Box 9010 Stn Prov Govt  
Victoria, BC V8W 9E2

**Fair implementation of Wireless Device 911 Levy to fund modernized and sustainable British Columbia 911 Call Centres**

Dear Minister Farnworth

On behalf of the British Columbia Urban Mayors' Caucus (BCUMC), we are writing to you to advocate for the introduction of a province wide 911 cellular telephone levy. The intent of this levy would be to provide an additional and consistent revenue stream that fully supports a sustainable 911 and emergency service delivery model for the Province of British Columbia.

All BC municipalities would benefit from the wireless device levy by receiving emergency 911 services that bolster public safety. Without adequate funding, there is a risk to public safety, as 911 call centres will not have the financial means to adopt technologies mandated by the CRTC, further decreasing the responsiveness in meeting the emergency needs of British Columbians.

When 911 was introduced in the 1980s, the predominate communication platform was landline telephones. The CRTC requires landline providers to collect a 911 levy from customers to support Emergency Communications. This was a decent model 30 years ago.

In 2019 Statistics Canada reported 93% of British Columbians own a cell phone and 47% of British Columbian households do not have a landline telephone service. From these stats, it is evident that a shift has occurred, making cell phones the predominate communication platform. It is expected that the use of landline services will continue to diminish and with that revenue generated by a landline 911-levy.

E-Comm 911 (E-Comm) is the primary Public Safety Answering Point (PSAP) for 99% of the 911 calls in the province and provides dispatch services for 33 police agencies and 40 fire departments.

The BCUMC recognizes that the ever-increasing pace of technological advancements and changes, maintenance, evergreening of equipment, and staff recruitment and training is becoming progressively difficult and costly to maintain. Without adequate funding, there is a risk to public safety as E-Comm will not have adequate financial means to adopt technologies mandated by the CRTC, leading to decreased service levels and responsiveness in meeting the emergency needs of British Columbians.

The pending Next Generation 911 (NG911) prioritizes the identification of a sustainable funding model that does not disproportionately impact municipalities.

Using the Abbotsford Police Department as an example, the budgeted cost of E-Comm for 2022 is \$2.38 million, this is the equivalent of 16.8% of the Abbotsford Police non-salary budget. We use this example to provide an understanding of the financial pressure faced by cities and municipalities to fund public safety communication. Each BCUMC member faces similar pressures.

E-Comm call answer and transferring delays to BC Emergency Health Services have been well documented in 2021. However, these delays cannot only be attributed to a shortage of paramedic call takers. E-Comm operations has faced many challenges in the last few years which directly impacted their ability to answer 911 and maintain a consistent and acceptable level for emergent and non-emergency calls for service.

In the last few years, E-Comm's call taking capabilities have deteriorated. E-Comm management have advised this is due to several competing factors: province-wide call volume increases, significant recruitment challenges, training and retention challenges, expansion into new service areas without fully understanding the impact to overall operations, and lack of understanding in changes to population characteristics that affect public safety.

For police agencies that contract with E-Comm for dispatch services, the operational challenges faced by 911 call answering has also significantly affected non-emergency call answer times. When the 911 call queue backs up, E-Comm workforce management will move Non-Emergency call takers to the 911 emergency call taking queues. While the right thing to do is to prioritize emergency calls, an improperly funded staffing model further impedes day-to-day non-emergent crime reporting.

There have also been significant external and environmental factors that have impacted public safety call volumes overall: two years in a global pandemic, extended wildfire seasons, heat domes, atmospheric rivers coupled with significant flooding and province wide infrastructure damage, and an opioid crisis. These public safety emergencies in 2021 further highlight the critical need for a stable PSAP model.

To add further complexity, the CRTC has mandated that all Telecommunication providers must update their networks to get ready for Next Generation 911 (NG911). Telecommunication technology has exponentially evolved. Texting and sending photos and videos is now commonplace. The CRTC wants to ensure that emergency services benefit from these advancements. Deploying the technology updates required for NG911, while also updating call-taking and dispatch practices, will take capital resources, people, and time.

Given the challenges now and in the future for emergency service providers, BCUMC is calling for a sustainable, modernized funding model. It is imperative that additional revenue streams be created to fund, sustain, and develop public safety communications. There is a successful model in Alberta, introduced in 2014, where, as of 2021, the call answer levy is billed at .95 cents per month per wireless device invoice.

Emergency Communications in the Province of British Columbia is at a critical juncture. It is time to introduce a province wide 911 cell phone levy to ensure reliable public safety communications. In BC, at a conservative estimate, there are approximately 3.5 million cellphone subscriptions which would generate approximately \$39.9 million annually to fund 911 call centres sustainably and reliably in British Columbia.

Thank you very much for your consideration of our input and request. We would be pleased to discuss this matter further, at your convenience.

Sincerely,



Colin Basran  
Mayor, City of Kelowna  
Co-Chair BC Urban Mayors' Caucus



Lisa Helps  
Mayor, City of Victoria  
Co-Chair BC Urban Mayors' Caucus

cc. Laurey-Anne Roodenburg, UBCM President