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**To:** ["Direct to Mayor and Council"](#)  
**Date:** 3/5/2025 6:14:31 PM  
**Subject:** Provincial Review of E-Comm, Key Messages  
**Attachments:** 20250305 E-Comm KMs - Province review.pdf

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Dear Mayor and Council,

Attached is a document E-Comm has prepared that summarises key messages concerning the current [provincial review of E-Comm](#).

This document provides the following information:

- What is E-Comm's position on the Province's independent review?
- What has E-Comm done already to address operations, governance and financial challenges?
- What will happen to E-Comm's governance and financial model project, and needed improvements to E-Comm's pricing model?
- E-Comm's recommendations for future of 9-1-1 in B.C.
- Guiding principles for changes to 9-1-1
- National landscape for 9-1-1
- Why changes are needed to 9-1-1 in B.C. – inequitable access and service standards
- Challenges with current governance of 9-1-1
- Why provincial funding of 9-1-1 is needed
- Alignment with our local government partners
- Governance improvements for E-Comm/what could a new provincial corporate structure for E-Comm look like

Thanks,

Karen

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The City of Vancouver acknowledges that it is situated on the unceded traditional territories of the x m k y m/Musqueam, S wx\u817\_wú7mesh/Squamish and s lilw ta /Tsleil-Waututh nations

**Key Messages for Shareholders and Partners**  
**Province's Independent Review of E-Comm and 9-1-1 in B.C.**  
**March 5, 2025**

**Province's independent review**

**What is E-Comm's position on the Province's independent review?**

E-Comm welcomes the review, and has long supported calls by the Union of BC Municipalities (UBCM), our local government and agency partners, police chiefs and the Legislature's Finance Committee, for greater provincial responsibility and funding for 9-1-1 services in B.C.

**What has E-Comm done already to address operations, governance and financial challenges?**

E-Comm initiated and actively participated in two prior reviews. An operations review, conducted by PwC in 2021, found E-Comm was understaffed by approximately 125 front-line call taking positions. It cautioned that the future cost of achieving current service level targets would be unsupportable without staffing improvements and modernization. In response, E-Comm launched a comprehensive transformation plan, with funding from our local government partners, which has positively impacted our operations. As a result, E-Comm has achieved its highest annual service-levels in 2024 since 2016.

A governance review, completed by Deloitte in 2024, identified 10 key changes needed to improve our governance and financial model. These include a new pricing model, to provide greater transparency, predictability and fairness for our partners.

**What will happen to E-Comm's governance and financial model project, and needed improvements to E-Comm's pricing model?**

The E-Comm board has paused engagement on the governance and financial model reforms, pending the outcome of the Province's independent review. That said, our partners have clearly identified the urgency of a new financial and pricing model to provide greater transparency, predictability and fairness. We are concerned by the potential for this priority to be delayed indefinitely following completion of the review, and have asked the Province to commit to enable progress to resume as quickly as possible once it is complete.

**E-Comm's recommendations for future of 9-1-1 in B.C.**

**What are E-Comm's recommendations for 9-1-1?**

- *Provincial responsibility* – Provincial government responsibility for 9-1-1 service in B.C.
- *Standards* – New legislation and provincewide standards for 9-1-1 in B.C.
- *Funding* – Stable, dedicated provincial funding for 9-1-1, and a consistent approach to locally-funded police emergency communications.
- *Governance* – New professional governance for E-Comm to improve 9-1-1, with strong local government input, and more effectively-coordinated emergency communications.

## Guiding principles for changes to 9-1-1

E-Comm recommends the following guiding principles be considered in changes to 9-1-1:

- *Equal access* – All British Columbians should have access to 9-1-1 and the same standards of 9-1-1 call-taking service, including First Nations, rural and remote communities.
- *Interoperability and redundancy in emergency infrastructure* – Ensure foundational 9-1-1 and emergency communications infrastructure and redundancy is in place to support improved emergency preparedness, particularly in the adoption of Next Generation (NG9-1-1) technology.
- *Coordination of emergency communications* – Work to improve provincewide coordination and planning of emergency communications centres, including staffing, systems and technology, versus the current fragmented patchwork of call-taking services.

## National landscape for 9-1-1

*Legislation* – Eight of 10 provinces have legislation governing 9-1-1 service:

- B.C. and Ontario are the only two exceptions.
- In a 2017 Telecom Policy decision on Next Generation 9-1-1, the CRTC specifically said: *“The Commission therefore recommends provinces that do not have 9-1-1 legislation in place enact appropriate legislation to address coordination, standards, funding and public education...”*

*Funding* – Seven provinces have a provincial wireless call-answer levy to fund 9-1-1:

- B.C., Ontario and Manitoba are the only exceptions. (B.C. has a patchwork of municipal landline call-answer levies on TELUS home-phones. However unlike in other provinces, these were never applied to wireless customers as cellular adoption grew.)
- These wireless levies vary in application, scope, rate, administrative fees and governance.

## Why changes are needed to 9-1-1 in B.C. – inequitable access and service standards

In B.C., 9-1-1 service-delivery and funding are the responsibility of Regional Districts, with no provincial coordination to ensure consistent service-level standards and call-answer protocols:

- Many parts of the province, including in Central Coast Regional District, Haida Gwaii, and the northwest of B.C. do not 9-1-1 service.
- Because E-Comm provides 9-1-1 call-taking services on behalf of 25 Regional Districts, we potentially must adhere to 25 different service-level standards and sets of call-answer protocols.

## Challenges with current governance of 9-1-1

Given the differences between Regional Districts, it can be difficult to achieve common practices and standards. One example is the recent delays associated with TELUS securing Local Governing Authority (LGA) agreements with Regional Districts to enable implementation of NG9-1-1.

By contrast in Alberta, which has 20 different Public Safety Answer Points (PSAPs) owned by local governments answering 9-1-1 calls, but governed by common provincial legislation and standards, adoption of LGAs was much simpler and faster.

Consistent provincewide standards for 9-1-1 are also a necessary enabler for broader public safety improvements, including the 2022 recommendations of the Special Committee on Reforming the Police Act, which called for provincial responsibility for B.C., a fourth option for 9-1-1 calls requiring mental health support; and more culturally-appropriate emergency call-response for First Nations. New modes of 9-1-1 service, such as the text-to-9-1-1 protocol anticipated in the next few years, also require a single, provincial standard to be effective.

### **Why provincial funding of 9-1-1 is needed**

- *Increased call volumes* – As call-enabled smart devices have become more ubiquitous, the volume of emergency calls has grown over the last 10 years. Other factors include population growth, an aging population, increased climate-related emergencies, the ongoing opioid public health emergency, mental health and housing affordability issues.
- *Decreased municipal revenues from landline call-answer levies* – As the number of landline customers has decreased, so too have the revenues available to local governments from existing landline call-answer levies in B.C. to fund 9-1-1 services.
- *Inequitable funding base* – The municipally-based funding model for 9-1-1 services became increasingly inequitable, with a growing number of 9-1-1 calls being made by cellular users, who did not help fund the service, and property owners having to instead shoulder the financial burden for services used by a much larger population.

### **Alignment with our local government partners**

#### *Provincial responsibility for 9-1-1*

UBCM has consistently called for a provincial approach to managing and funding 9-1-1:

- The first resolution was passed in 1987, moved by the Nanaimo Regional District, calling for provincial coordination of 9-1-1 funding and levies, reconfirmed in 1992 (Qualicum Beach) and Merritt (1995).
- The UBCM Community Safety Committee and Local Government Policing Modernization Roundtable have also called for provincial responsibility for 9-1-1 (Sep. 2022 report).

#### *Provincial funding for 9-1-1*

UBCM has advocated for provincial funding for 9-1-1 and a provincial wireless call-answer levy:

- Beginning in 2004, UBCM has endorsed 7 resolutions calling for wireless call-answer levy on behalf of local governments, including 2004, 2009, 2011, 2012, 2019, 2021, 2023.
- The 2023 “special resolution” was the most comprehensive to date supporting a call-answer levy, calling in addition for consistent provincewide standards for 9-1-1, a provincial governance model, and the integration of mental health as an option for 9-1-1.

## **Other advocates for provincial funding**

A number of E-Comm's other government and public safety partner organizations have also publicly called for provincial funding for 9-1-1, such as through a provincial call-answer levy:

- 10 south Vancouver Island mayors (January 2025);
- Official Opposition Critic for Public Safety (January 2025);
- BC Association of Chiefs of Police (April 2024 letter to Province);
- Legislative Assembly of BC Finance Committee (August 2023 and August 2022 budget-consultation reports).

## **Governance improvements for E-Comm**

### *Consolidated delivery of 9-1-1*

E-Comm believes that the current consolidated "shared service" model for 9-1-1 call-taking in B.C. is the most efficient and effective:

- Consolidation of 9-1-1 call-taking in B.C. provides improved economies of scale, better staffing, improved technology and system innovation, and more affordable capital costs than exist in smaller operations centres with different governance structures.
- That said, there are different structures for 9-1-1 call-taking within western Canada. For example, Alberta has 20 different primary PSAPs, Saskatchewan has three, and Manitoba two. But unlike B.C., all three provinces have provincial legislation, enabling consistent provincewide standards and funding.
- Regardless of the number of PSAPs providing 9-1-1 call-taking, the key principle for effective service-delivery is the need for consistent provincewide standards and funding.

### *What could a new provincial corporate structure for E-Comm look like*

There are many different models of corporate structures for government-owned or funded organizations providing public services. These can include:

- Agencies like regional health authorities, that are directly funded by the Province, with provincially-appointed boards;
- Crown corporations like BC Hydro, ICBC or BC Housing, that also have other revenue streams, and provincially-appointed directors; and
- More autonomous authorities such as YVR or Vancouver Fraser Port Authority, which typically have commercial revenue streams and professional board-directors, and input for local government and community stakeholders.

Regardless of the specific structure, the key priorities for improving 9-1-1 are stable, dedicated funding, and effective, professional board oversight.