



The Honourable Minister Steven Guilbeault
Honourable Minister of Canadian Heritage
House of Commons
Ottawa, Ontario
K1A 0A6

The Honourable François-Philippe Champagne
Minister Industry, Science and Economic Development
C.D. Howe Building
235 Queen Street
Ottawa, Ontario K1A 0H5

The Honourable Minister Bill Blair
Minister of Public Safety
House of Commons
Ottawa, Ontario
K1A 0A6

June 1, 2021

Dear Honourable Ministers

We are writing to you today regarding implementation issues that first responder organizations are experiencing in the effort to meet the Next Generation 911 (NG911) expectations nationally. Let us begin by contextualizing our implementation concerns in our very strong support for the NG911 initiative and its importance for public safety in Canada.

Some of the country's 300 Public Safety Answering Points and the information storage facilities for them will exist within fire departments. While we support modernization, like other organizations, we are concerned about three main issues (1) timelines (2) privacy concerns and (3) implementation costs.

For timelines, we support CRTC in its consideration of an extension to the implementation deadlines. As noted by others however, 2024 is unlikely to be sufficient. We would encourage an extension with a renewed focus on resolving cost and implementation issues. As part of this we would also strongly encourage implementation of the public safety broadband network. A successful NG911 system will require a public safety broadband Network that can support the additional data needs.

As it pertains to privacy, PSAPs and fire departments dispatch centres will become the holders of a much larger amount of private and/or confidential information. Most dispatch centres are regionalized and house data for several public safety agencies.

A requirement on dispatch centre agencies to directly provide information for all handled incidents would place an enormous burden on those dispatch centres. The public safety jurisdiction agency where the incident occurred should be responsible for providing information/data to any FOI requests.

The dispatch centre should be exempt from the FOI inquiries through legislation. If the information is required in a court case or for other purposes, such as, freedom of information requests, exceptions to the expectations under Provincial privacy legislation and under the Personal Information Protection and Electronic Documents Act will be needed

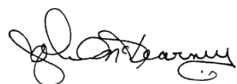
In this regard, we commend as a starting point the elements proposed for Canada's Digital Charter, which includes the call to modernize and streamline PIPEDA. While safety, security, privacy and trust are listed appropriately as principles, there is no explicit acknowledgement of emergency management and communications. Since this would have different implications and considerations, we would encourage special initiative to flesh this out. CAFC's Interoperability Committee would be pleased to assist.

Finally, implementation and privacy issues bring with them costs. Over 85% of Canada's Fire Service is volunteer. Municipalities often rely on volunteers for emergency services. Given that the entire system is under-funded, it would be essential for a legacy investment from the federal government to help cover the initial infrastructure costs such as data storage and meeting privacy legislation requirements. Further consideration has to be given to how the operating costs will be offset in the long run.

Ministers, the Canadian Association of Fire Chiefs is open and willing to assist in this national endeavour. We thank you for your consideration of these views. Your staff can contact us through our Executive Director, Dr. Tina Saryeddine at 613-324-1078 or by email at tsaryeddine@cafc.ca

In closing, we thank you for championing such an important opportunity for Canada. By modernizing our entire infrastructure, we will continue to make our country among the best, safest, and most innovative in the world.

Sincerely,



John McKearney
Fire Chief, Whistler British Columbia
President and Chair of Board, CAFC



Bryan Singleton
Deputy Chief, Edmonton Fire Rescue Services
Chair, CAFC Interoperability Committee

CC: CAFC Board of Directors