

**BEFORE THE CANADIAN RADIO-TELEVISION AND
TELECOMMUNICATIONS COMMISSION**

**IN THE MATTER OF AN APPLICATION BY
THE PUBLIC INTEREST ADVOCACY CENTRE
& CHIMO COMMUNITY SERVICES
(APPLICANTS)**

**REGARDING CHARGES FOR WIRELESS CALLS TO HELPLINES
PURSUANT TO PART 1 OF THE *CRTC RULES OF PRACTICE
AND PROCEDURE* AND SECTIONS 24, 25, 27(1), 27(2), 55(c), and 56
of the *TELECOMMUNICATIONS ACT* DIRECTED TO**

**BELL MOBILITY INC., TBAYTEL, HURON TELECOMMUNICATIONS CO-
OPERATIVE LIMITED, HAY COMMUNICATIONS CO-OPERATIVE LIMITED,
INUKSHUK WIRELESS PARTNERSHIP, ROGERS COMMUNICATIONS
PARTNERSHIP, MTS INC., DATA & AUDIO VISUAL ENTERPRISES WIRELESS
INC., LYNX MOBILITY INC., TERRESTAR SOLUTIONS INC., EXECULINK
TELECOM INC., VIDÉOTRON S.E.N.C. VIDEOTRON G.P., WIGHTMAN TELECOM
LTD., QUADRO COMMUNICATIONS CO-OPERATIVE INC., SOGETEL MOBILITÉ
INC., BRAGG COMMUNICATIONS INCORPORATED (EASTLINK CABLE SYSTEMS
OR EASTLINK), NORTHWESTEL INC., GLOBALIVE WIRELESS MANAGEMENT
CORP. (WIND MOBILE), SSI MICRO LTD., GLOBALSTAR CANADA SATELLITE
CO., PUBLIC MOBILE INC., TELUS COMMUNICATIONS COMPANY, GOGO
CONNECTIVITY LTD., BROOKE TELECOM CO-OPERATIVE LTD., ICE WIRELESS
INC., FIDO SOLUTIONS INC., TÉLÉBEC, SOCIÉTÉ EN COMMANDITE TÉLÉBEC,
LIMITED PARTNERSHIP, CITYWEST MOBILITY CORP., KMTS, MORNINGTON
COMMUNICATIONS CO-OPERATIVE LIMITED, NORTHERNTEL, LIMITED
PARTNERSHIP, SASKATCHEWAN TELECOMMUNICATIONS (SASKTEL), AIRTEL
WIRELESS LTD, NEXICOM MOBILITY INC., AND DRYDEN MOBILITY
(RESPONDENTS)**

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TABLE OF CONTENTS

1. Nature of application	3
2. Facts	4
2.1 Background	4
2.2 Growing importance of mobile wireless services	5
2.3 Impact of wireless charges on helpline callers.....	7
2.4 Impact of wireless charges on helplines	8
2.5 Anonymity and confidentiality concerns	9
3. Grounds of Application	11
3.1 The Commission’s mandate and authority.....	11
3.2 Inconsistency with objectives of Canada’s telecommunications policy	12
3.3 Inconsistency with section 27(2).....	13
4. Nature of decision sought	13
Application Service List	15

1. NATURE OF APPLICATION

1. Pursuant to Part 1 of the *CRTC Rules of Practice and Procedure*¹ (the “**Rules of Procedure**”) and sections 24, 27, 47, 48 and 56 of the *Telecommunications Act*² (“the **Act**”), the Public Interest Advocacy Centre (**PIAC**) and Chimo Community Services (**Chimo**) – together, the “**Applicants**” – hereby request that the Commission issue certain directives to the Respondents concerning serving arrangements provided to retail mobile wireless service customers when they access helplines using their wireless devices.
2. PIAC is a non-profit organization that provides advocacy and research services on behalf of Canadian consumer interests – and vulnerable consumer interests in particular – concerning the provision of important public services.³ Chimo Community Services is a non-profit organization that assists individuals and families in crisis or transition through its crisis line and counselling, outreach and advocacy, and settlement services programs. Created in Richmond, B.C. in 1973, Chimo now serves over 10,000 individuals and families each year from different cultural backgrounds, age groups, family lifestyles, and economic situations.⁴
3. Several other organizations have also expressed support for Commission intervention in the subject matter of this Application. These organizations include:
 - Ending Violence Association of B.C. (EVA BC);
 - Family Services of Greater Vancouver;
 - Ontario Association of Interval and Transition Houses (OAITH);
 - Ontario Coalition of Rape Crisis Centres (OCRCC);
 - Richmond Youth Service Agency;
 - Safe Communities Cranbrook Committee;
 - Vancouver Coastal Health; and
 - Women Against Violence Against Women (WAVAW) Rape Crisis Centre.

Copies of letters from these organizations expressing support for this application are attached in Appendix A.

4. We are filing this application to draw the Commission’s attention to and seek relief regarding troubling developments faced by providers and users of help and crisis line services (hereinafter “**helplines**” or “**helpline services**”).

¹ SOR/2010-277.

² S.C. 1993, c. 38.

³ See the Public Interest Advocacy Centre, online: <http://www.piac.ca>.

⁴ See Chimo Community Services, online: <http://www.chimoservices.com/> for more information.

5. PIAC and Chimo request that the Commission:
- (i) Require wireless service providers (and resellers of wireless services) to provide access to helplines at no cost to users or the helplines in question;
 - (ii) Direct wireless service providers to develop measures which protect the confidentiality of helpline users, so that details of a call to a helpline (including account information which identifies the caller and helpline) are not disclosed by the wireless service provider to anyone; and
 - (iii) Order the respondent wireless service providers to reimburse our costs of participating in this proceeding under s. 56 of the *Act*.

2. FACTS

2.1 Background

6. Helplines are typically operated by organizations such as Chimo (and other organizations such as those listed in Appendix A) to provide assistance on an urgent basis, and at no cost, to individuals often in times of personal crisis. The helplines operated by Chimo and these other organizations have often been established to provide emergency assistance to individuals experiencing, or who have experienced, personal crisis, domestic abuse or violence.
7. Helplines are also used to provide a range of services, including counseling, information, advice, and support to individuals in need.
8. In addition to the areas served by Chimo's helplines, helplines services operated by other organizations may provide counseling and crisis support for suicide prevention⁵. Helplines may also provide assistance to victims of substance abuse⁶ and are used, as well, to provide advice and counseling services to children and youth⁷. Helplines are sometimes used to provide medical assistance or to triage in the case of health care services⁸. And helplines may serve users in a community, province or territory; in some instances, they may provide service nationally.

⁵ E.g. Distress Centres Ontario, Suicide Action Montreal, and Distress Line of Southwestern Alberta.

⁶ E.g. Drug and Alcohol Helpline, Telecare and Yukon 800.

⁷ E.g. Kids Help Phone, YouthInBC, and the Youth Services Bureau.

⁸ E.g. HealthLink 811, Mental Health Crisis Line, and Vancouver Coastal Health.

9. A key focus in the delivery of the services provided by helplines is accessibility. Ensuring that services are accessible to individuals in need is an important aspect of helpline services. Helpline services are typically operated on a 24 hours a day, 7 days a week, and 365 days a year basis.
10. Helpline services often depend on volunteer resources and on financial support from the community. Virtually all of the helplines operated by Chimo and some of the organizations in Appendix A function on a non-profit basis.
11. To facilitate access, helplines typically do not charge users for their services. This is particularly important as helplines such as those operated by Chimo and the organizations in Appendix A provide assistance to economically disadvantaged individuals. For individuals with limited financial means, usage costs associated with telephony service can present a significant challenge.
12. In its letter, for instance, the Richmond Youth Service Agency writes that many of the youth they assist have pay-as-you-go cell phone plans and run out of minutes very quickly. Similarly, Family Services of Greater Vancouver writes that many of the individuals they work with fall “well below the poverty line, which means many services that are available to the general public are not available to them.” In order to assist these individuals, service must be provided at no cost to the user.
13. Consistent with this objective, helpline services are typically configured so that they are easily accessible by a local call or, alternatively, through a toll free telephone number when a call to the helpline would entail long distance calling.
14. To facilitate access, many helpline service providers also make a commitment to protect their users’ privacy and confidentiality. In some cases, callers may remain anonymous. For the Applicant as well as the organizations identified in Appendix A, protecting caller confidentiality is an important aspect of the services they provide. Many helplines also emphasize the fact that services are provided on a non-judgmental basis – once again, to facilitate access by users.

2.2 Growing importance of mobile wireless services

15. As the Commission is aware, Canadians increasingly rely on wireless service providers (**WSPs**) for voice telephony services.

16. Moreover, the growth of wireless substitution (whereby customers abandon wireline in favour of mobile wireless telephony) and of wireless-only households has been well documented. For instance, the Commission reports that the proportion of households with wireless telephone access only rose dramatically from 1.7% in 2002 to 12.8% in 2011.⁹ We expect this trend to continue.
17. As a result of the increasing popularity of wireless telephony, for a significant and growing proportion of Canadians access to voice telephony means access to a wireless, and not wireline, network service. The Commission discussed this phenomenon in its *Navigating Convergence II: Charting Canadian Communications Change and Regulatory Implications* report, issued in August 2011:

Over the past decade, Canadian consumers have begun substituting their home phones for wireless phones, a practice known as “cord-cutting.” In its December 2010 Residential Telephone Service Survey, Statistics Canada found that 13 percent of Canadian households were wireless-only, up from 8 percent in 2008. The 18-34 year-old demographic was most likely to own only wireless phones. Half of these household were wireless-only (up from 34 percent in 2008) and renters made up 68 percent of all wireless-only households.

Because Canada’s cord-cutting trend lags that of the United States (US) by two to three years, American data may indicate future trends in Canada. A study by Nielsen showed that smaller households in the US—those with only one or two residents—are more likely to cancel their wired-phone plans than larger households. This same study showed that 10 percent of all surveyed landline users had experimented with cord-cutting at one point but chose to restore landline services.

Similarly, a US-based study by the Centers for Disease Control (CDC) reported that 69.4 percent of households that comprised unrelated adults with no children relied only on wireless phones. The study also showed that more than one-third of adults who lived alone also relied only on wireless phones...¹⁰

18. The Canadian Wireless Telecommunications Association reports on its website that as of mid-2013, over 27 million Canadians were subscribed to wireless services.¹¹

⁹ CRTC, *Communications Monitoring Report* (September 2013) at Table 2.2.3.

¹⁰ Available on the CRTC’s website at: <http://www.crtc.gc.ca/eng/publications/reports/rp1108.htm#b25>, (accessed 16 September 2013), section 2.1.3.

¹¹ More specifically, as of Q2 2013, 21.662 million postpaid subscriptions and 3.746 million prepaid subscriptions. From the CWTA’s website: *Facts and Figures [:] Wireless Phone Subscribers in Canada [:] 2013*, available at http://cwta.ca/wordpress/wp-content/uploads/2011/08/SubscribersStats_en_2013_Q2.pdf.

2.3 Impact of wireless charges on helpline callers

19. In Canada's wireless marketplace, wireless customers pay (or their accounts are debited) for airtime associated with all calls they initiate (or, in some cases, receive).¹² Canadian consumers incur usage whenever they originate mobile wireless calls¹³, including local calls and calls to toll-free numbers. Thus, while the routing of a call to an 800/888 number (or other so-called "toll free" arrangements) may be covered by the charges paid by the 800/888 number holder, consumers who originate calls to such numbers still face wireless usage charges. We are unaware of any serving arrangements currently offered by Canada's wireless service providers that enable their customers to initiate calls to helplines at no charge to the caller (or without incurring usage on the customer's account).
20. Usage costs for consumers, and particularly for those from economically and socially vulnerable groups, can be substantial and can affect these consumers' ability to make use of their wireless phones¹⁴. Furthermore, due to the nature of the services provided by helplines, calls can be lengthy.
21. As letters included in Appendix A indicate, many of the organizations which operate helplines assist individuals who have extremely limited financial means. Many clients are also on pay-as-you-go wireless plans. Family Services of Greater Vancouver, for instance, writes:

The individuals with whom I work are primarily women who have already left or are trying to leave an abusive relationship. For many that are able to afford cell phones, they are limited to the most basic plans available. When a woman leaves/is trying to leave an abusive relationship, she is navigating through a variety systems (e.g. seeking income assistance; seeking a space in a shelter; trying to establish connections with various community resources, including support from a crisis line). In many cases, a woman may have to access half of her monthly minutes in one phone call.

¹² The consumer either pays a discrete usage charge, or if the periodic (e.g. monthly) rate paid by the user includes a quantity of airtime, time spent contacting a helpline is debited against this airtime. Once the consumer's contracted airtime allowance is reached, the consumer is typically billed at a per-minute rate.

¹³ There are exceptions to this, such as calls initiated by a consumer to their WSP using the WSP's 6-1-1 or equivalent customer service access service arrangement. Some service providers state that there are no charges for 9-1-1 usage. Usage of 9-1-1 may be billed through distinct 9-1-1 charges. See for example, in relation to prepaid service from Rogers Communications Inc.: http://your.rogers.com/promo/wireless/paygoguide_shortcuts.asp.

¹⁴ See, for example, Sawchuk, Kim and Barbara Crow "Talking Costs [:] Seniors, cell phones and the personal and political economy of telecommunications in Canada" in *Telecommunications Journal of Australia* 60.4 (2010) at p. 55.10 (accessed 11 Dec. 2013).

...

Many of the women with whom I have worked say they couldn't call help lines or crisis lines because they didn't have enough minutes left on their plan or couldn't afford to top up their "pay as you go" phones. In this way, the charges interfered with their safety.

22. Services provided by helplines typically entail direct conversations between clients and helpline staff. Due to the nature of the services provided by helplines, such conversations can sometimes be lengthy. Letters from agencies which operate helplines consistently stress that alternatives such as, for example, SMS text messaging would not be a viable substitute for voice communication for the provision of crisis and counselling support.¹⁵ In addition, groups with limited English literacy or text capacity, such as refugees, immigrants, or individuals with disabilities, may not find text messaging to be an accessible means of communication.
23. For illustrative purposes, we display, in Appendix B, usage costs for individuals in B.C. initiating wireless calls to 800/888 toll-free numbers. We have informally queried the websites of Canada's largest WSPs and identified the cost of making local calls or calls to 800/888 numbers from a number of lower cost wireless post paid service offerings¹⁶.
24. As more and more consumers rely primarily or exclusively on wireless services, the ability of helplines to continue offering service on a no-cost basis for users is increasingly being undermined. With the growth of wireless telephony, relying on local calls and toll-free numbers is no longer sufficient to provide access, free of charge, to users. As letters from the organizations in Appendix A indicate, these costs are a matter of substantial concern for the operation of these organizations' helplines.

2.4 Impact of wireless charges on helplines

25. The impact of wireless charges on organizations which operate helplines was recently brought to our attention by the Chief Medical Officer and Vice President for Public

¹⁵ See Appendix A: Letters submitted by EVA BC, OAITH, OCRCC, and WAVAW.

¹⁶ To compile the data in Appendix B, we queried the websites of the three largest WSPs serving the greater Vancouver area on 15 and 18 November 2013 for the lowest cost stand-alone voice service offerings.

Health (hereinafter the “**Chief Medical Officer**”) of Vancouver Coastal Health¹⁷ (**VCH**). VCH and the institutions it oversees operate a number of helplines. A copy of their letter can be found in Appendix A.

26. More specifically, the Chief Medical Officer raised the following issue:

It has come to my attention that access to help line services that are made available to support health care delivery and prevention, may be impeded due to costs associated with cell phone use. A recent example that came to my attention was the peri-natal depression line that is an important service to support new mothers and prevent potential mental issues. There appears to be an emerging issue in relation to help lines generally in that using a land line may be toll free but the same call on a cell phone may incur costs for the person requiring the services. These expenses could discourage the caller from taking advantage of the service.

27. Helplines are prevented from effectively providing their services when callers are prevented from accessing them or restricted when trying to reach them with their wireless devices.
28. The issues raised by the Chief Medical Officer and by other helpline operators should be a matter of concern to the Commission, especially in light of the mandate Parliament has assigned to the Commission in the telecommunications policy objectives of the *Act*.

2.5 Anonymity and confidentiality concerns

29. It is our understanding that, as postpaid wireless service users initiate calls, usage information (including the telephone number of the recipients of the calls) is made available to the account holder. For helplines which provide service on a confidential or anonymous basis, and for users of their services – for example, victims of domestic abuse, violence, or substance abuse or children and youth in need of counseling

¹⁷ Vancouver Coastal Health is one of 6 health authorities in British Columbia which govern, plan and coordinate the delivery of health services on a regional basis within specified areas in the province. VCH is responsible for the delivery of community, hospital and residential care in a territory which includes Richmond, Vancouver, North Vancouver, the Sunshine Coast, the Sea to Sky corridor, Powell River and the Central Coastal area of British Columbia. A copy of the Chief Medical Officer’s letter is enclosed in Appendix A.

services – the disclosure to a party other than the caller of the helpline’s telephone number could have harmful impacts.

30. For victims of domestic violence or substance abuse, or for troubled children and youth, the disclosure of called party information could create a disincentive to use helplines, thus undermining their service objectives. The Richmond Youth Service Agency, for instance, writes that, “[f]or some of our youth, their parents pay the phone bill and would be reluctant to access help if their parents were aware of the phone call.”
31. For many helpline services, confidentiality is important¹⁸. Yet, in these circumstances, it appears that under current serving arrangements helplines cannot ensure users’ anonymity or confidentiality for users of wireless devices¹⁹.
32. The ability of helplines to provide services on an anonymous or confidential basis to wireless service users would be undermined by the availability of caller information. In light of the Commission’s mandate, this should similarly be a matter of concern to the Commission.

¹⁸ See, for example Kids Help Phone which states in its informational material that it is “Canada’s only free, national, bilingual, confidential and anonymous” help line for kids (see: <http://www.kidshelpphone.ca/Teens/AboutUs.aspx>). See its service Kids Help Phone Promise at <http://kidshelpphone.ca/Teens/AboutUs/The-KHP-Promise.aspx> .

¹⁹ For example, the Kids Help Phone organization’s website provides the following information in a FAQ section:

Does Kids Help Phone’s phone number show up on cell phone bills?

Kids Help Phone’s service is confidential and anonymous. If you’re concerned about the phone number appearing on your cell phone bill, we recommend that you call us from a landline.

We question the extent to which the needs of users of such services can be met when helpline providers must offer such advice. See <http://org.kidshelpphone.ca/en/about-us/faqs/> . See also, similarly, at: <http://kidshelpphone.ca/Teens/PhoneUs/Frequently-Asked-Questions-about-Calling.aspx> . Indeed, as discussed earlier, we question the relevance of such advice in a marketplace in which more and more Canadians only have a wireless device.

3. GROUNDS OF APPLICATION

3.1 The Commission's mandate and authority

33. In section 47 of the *Act*, Parliament has directed the Commission to exercise its powers and perform its duties “with a view to implementing the Canadian telecommunications policy objectives and ensuring that Canadian carriers provide telecommunications services and charge rates in accordance with section 27.”
34. The objectives of Canada’s telecommunications policy are set out in section 7 of the *Act*. In section 7, Parliament has directed the Commission to exercise its powers and perform its duties:
- (a) to facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions;
 - (b) to render reliable and affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada;
- and,
- (h) to respond to the economic and social requirements of users of telecommunications services.
35. Mobile wireless voice services have been forborne from rate regulation for many years²⁰.
36. However, while it forbore from regulating the rates of mobile wireless service providers, the Commission retained its authority under section 24 of the *Act*.
37. Section 24 provides that:
- The offering and provision of any telecommunications service by a Canadian carrier are subject to any conditions imposed by the Commission or included in a tariff approved by the Commission.
38. The Commission retained its ability to impose conditions on WSP services “in order to maintain and impose ... conditions ... that may prove to be necessary

²⁰ See: Telecom Decision CRTC 96-14, *Regulation of Mobile Wireless Telecommunications Services* (as well as Telecom Decision CRTC 94-15, *Regulation of Wireless Services*).

in the future.”²¹ The Commission also retained its authority under section 27(2) of the Act²².

3.2 Inconsistency with objectives of Canada’s telecommunications policy

39. Current WSP serving arrangements, whereby users of helplines face impediments in the form of usage charges and potential disclosure of their calls, are inconsistent with several objectives of Canada’s telecommunications policy.
40. Serving arrangements which result in the imposition of costs on access helplines, whose mandate is to provide needed assistance, often in times of crisis, and on victims of domestic violence or substance abuse, to troubled children and youth and to other vulnerable Canadians, do not serve to safeguard, enrich and strengthen the social and economic fabric of Canada.
41. The imposition of usage charges on these Canadians for access to helplines is not consistent with the objective of rendering affordable telecommunications services of high quality accessible to Canadians in both urban and rural areas in all regions of Canada.
42. Serving arrangements which impose on subscribers charges for access to helplines do not respond to the economic and social requirements of users of telecommunications services.
43. Finally, for victims of domestic violence or substance abuse, troubled children and youth and other vulnerable Canadians, the potential under the current regulatory regime of disclosure to account holders of call information also does not adequately respond to the economic and social requirements of Canadian users of telecommunications services; does not serve to safeguard, enrich and strengthen the social and economic fabric of Canada; and does not result in high quality telecommunications services for Canadians.

²¹ Decision 96-14, section III i).

²² *Ibid.*

3.3 Inconsistency with section 27(2)

44. Section 27(2) of the *Act* states that:

No Canadian carrier shall, in relation to the provision of a telecommunications service or the charging of a rate for it, unjustly discriminate or give an undue or unreasonable preference toward any person, including itself, or subject any person to an undue or unreasonable disadvantage.

45. Charges on wireless users of helplines are a significant impediment to vulnerable and at-risk Canadians who need to access these services. The industry's failure to address this issue to date is not consistent with the requirements imposed by section 27(2). By continuing to impose charges for wireless calls on users of helplines, Canadian WSPs harm helplines and their users, to the detriment of both. In doing so, they subject these helplines and their users to an undue or unreasonable disadvantage.

46. Helplines play a central role in assisting groups that are dealing with critical and, at times, life-endangering circumstances.

47. Accessibility to service at no cost to callers and in confidence is an essential quality of the services provided by helpline operators. WSPs also confer on themselves an unreasonable preference or advantage—WSPs generate usage charges while helplines and their users have no means of avoiding them.

48. To date, market forces do not appear to have provided adequate incentives to WSPs to do away with such charges or to adequately protect helpline users' confidentiality. Wireless usage in Canada has been steadily growing for several years now. Yet individual WSPs and the wireless industry have not developed any solutions to provide users no-cost access to helplines or to protect users and helplines from harmful disclosures of information. It is time for the Commission to intervene to protect helpline users and helpline service providers.

4. NATURE OF DECISION SOUGHT

49. Helplines are used to provide a range of services to individuals in need. Services provided over helplines include counseling, information, advice and support. Charges

on wireless users of helplines are a significant impediment to vulnerable and at-risk Canadians who need to access these services. They create an undue disadvantage for helplines and for helpline callers who often have little alternative to their wireless service to reach helpline assistance and who may be facing costly conversations as they seek the help they need.

50. In light of the concerns expressed in this application, we propose that the Commission require WSPs (and resellers of wireless services) to provide access to helplines at no cost to users or the helplines in question. Helplines already pay for access to their services through 800/888 (toll free) calling arrangements and through the PSTN access services to which they subscribe.
51. In addition, section 27(6)(b) states that a carrier may – with approval of the Commission – provide a service at no charge or at a reduced rate “to any charitable organization or disadvantaged person or other person.”
52. We also request that the Commission direct WSPs to develop measures which protect the confidentiality of helpline users. Details of a calling number to a helpline and account information which identifies the called party should not be disclosed by the WSP to anyone (including the account holder). The protection of this information is essential for many users of helplines, including victims of domestic violence.
53. Section 24 of the *Act* provides the Commission authority to impose conditions upon the delivery of mobile wireless telephony services. When it forbore from regulating mobile wireless service rates, terms and conditions, the Commission retained its powers under section 24.
54. Therefore, PIAC and Chimo request that the Commission:
 - (i) Require WSPs (and resellers of wireless services) to provide access to helplines at no cost to users or the helplines in question;
 - (ii) Direct WSPs to develop measures which protect the confidentiality of helpline users, so that details of a call to a helpline (including account information which identifies the caller and helpline) are not disclosed by the WSP to anyone; and
 - (iii) Order the respondent WSPs to reimburse our costs of participating in this proceeding under s. 56 of the *Telecommunications Act*.
55. This application is available online on the PIAC website and is available via e-mail if requested from: jfleger@piac.ca.

APPLICATION SERVICE LIST

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