



Who's Listening?

**Industry Concerns with the proposed
*Modernization of Investigative Techniques Act***

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Industry assumptions

Intended to:

- Extend requirements equally to all TSPs, technologies
- Extend existing LEA access to basic subscriber identification information from traditional telephony to newer technologies

Not intended to:

- Stifle innovation
- Download costs of policing to TSPs and their customers
- Expand use of electronic surveillance in Canada
- Alter the current balance between personal privacy and public safety

Industry needs

Business as usual

- Minimize impact on our core business
- Product introduction without immediate LA capability, as today
- Flexibility, speed to market are all important

Spell it out

- Clear, unambiguous requirements
- Acceptable technologies, solutions

Safe harbour

- Need to know that technologies, solutions purchased and deployed will ensure compliance

Industry needs

Follow the leader(s)

- Canada should not impose greater requirements than international norm
- Will *de facto* follow US, European requirements

Not built in a day

- Can't build anything until we know what to build
- Need adequate time to plan, purchase, test, install
- Retrofit requirement no help

Show me the money

- Cost-based compensation for TSPs for infrastructure investments, as today
- Cost-based compensation for TSPs for operational costs
- Is this really the *Funding Investigative Techniques Act*?

Industry proposal

Infrastructure capability

- No mandated capability before solutions commercially available
- When commercially available, industry will absorb cost
- Until then, government directs targeted deployment, provides compensation
- Real transition period

Operational costs

- Reasonable compensation to telecom service providers
- Grounds:
 - ✓ Apply uniquely to TSPs
 - ✓ Require advanced technical expertise and assistance
 - ✓ Significant costs and involvement
- C-74 silent on this point, despite active disputes



Questions?

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