July 15, 2011

Mr. Robert Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario  K1A 0N2  
Canada

Dear Mr. Morin:

Enclosed is an Application filed by the Canadian Common Ground Alliance (“the CCGA”) pursuant to Part 1 of the Canadian Radio-television and Telecommunications Commission Rules of Practice and Procedure. The Application proposes that the Commission broaden the current purpose or assignment of the three-digit dialing code 811 in order to enhance public safety and the security of Canada’s critical infrastructure networks. The Application applies and addresses the criteria for N11 numbers first established by the Commission in Telecom Decision 2001-475.

In the view of the CCGA, there is likely to be wide interest from many of the parties involved in this Application. Accordingly, the CCGA would suggest that the Commission issue a Telecom Notice of Consultation in order to provide parties with an opportunity to express their views.

Appended to this Application are letters of support from 30 organizations.

Sincerely,

[Signed Electronically]

Michael J. Sullivan  
Chair, Canadian Common Ground Alliance
Canadian Radio-television and Telecommunications Commission

Application by the Canadian Common Ground Alliance to broaden the assignment and use of the 811 Dialling Code

July 15, 2011
Executive Summary:

811 Services – a Broader Vision for Health and Safety in Canada

• In 2005, 811 was assigned by the CRTC as an access code for non-emergency teletriage health services. Non-urgent health services are currently accessible via 811 in four of the ten provinces and one territory. In the other six provinces and two territories, this scarce N11 resource is not in use.

• The safety and security of Canada’s critical national infrastructure services is an important public priority across Canada. Our governments, including the health sector, our economy and social systems rely heavily on the continued operation of these infrastructure services. Even a temporary interruption and loss of these services can severely disrupt the economy, government services and the lives of citizens in the areas affected. Accidental damage to energy networks can, in some cases, also directly threaten the health and safety of those in the immediate area.

• Much of our critical infrastructure, including energy (e.g., oil and natural gas), communications and electric power, water supply and sanitation, is underground. The greatest threat to the continued, uninterrupted operation of these critical infrastructure networks is unintended damage during excavation of the soil. Easy public access via 811 to “locate services” prior to excavation is the best way to prevent disruption to these critical services.

• The Canadian Common Ground Alliance (CCGA) has been formed by a wide group of key infrastructure industries and government agencies across Canada in order to improve the protection and security of these buried infrastructure networks. The Alliance includes major network operators, public and private, from across Canada.

• Canada has an opportunity to better protect public health, safety and security by broadening the current use of the 811 dialling code. The CCGA members propose that the 811 code be assigned for joint use to serve public health in the widest sense as well as public safety and security.

• The general public would be informed of the broader services accessible via 811 in any province where both uses have been implemented. Callers would be given a clear choice between the services they could access, at no charge to the caller. The Regional Partners of the CCGA have committed to collaborate with their respective provincial governments to design public education plans in each province that clearly identify the dual function of the 811 dialling code. Across Canada, a significant amount of financial and administrative resources are currently allocated to designing and implementing public awareness programs promoting damage prevention to buried infrastructure. Going forward, these resources would align to promote 811 on a very broad scale benefitting the governments that now use or will in the future use 811 for public health.

• Furthermore, by aggregating the purchase of telecommunications network services necessary to support these 811 public services, the provinces and the infrastructure network operators could jointly achieve savings and efficiencies that would not be possible if all such operations were arranged separately. More services could be delivered to the public at a lower cost. Given the pressure on public sector budgets throughout Canada, such savings and efficiencies would be an important benefit. The six provincial health departments not currently using 811 may be able to do so earlier than otherwise would be the case.
• The CCGA notes that the Commission has previously approved the assignment of an N11 number to be jointly used by two separate information services. Specifically, in Telecom Decision 2006-44, the Commission approved the assignment of 511 to joint use by weather and travel information services.
Introduction

1. This Application is filed with the Canadian Radio-television and Telecommunications Commission (CRTC) pursuant to Part 1 of the CRTC Rules of Practice and Procedure by and on behalf of the Canadian Common Ground Alliance (CCGA) requesting that the Commission broaden the current assignment and use of the 811 dialling code. The Regional Partner members of the Alliance, and links to their respective member lists, are provided in Appendix B.

2. The Canadian Common Ground Alliance was formed by a wide group of key infrastructure industries, both public and private, and government agencies in order to enhance the protection and security of Canada’s key buried infrastructure networks. Much of our critical national infrastructure, including many energy (e.g., oil and natural gas), communications and electric power, is underground. The continued, uninterrupted operation of these critical networks services is most frequently threatened by one cause: inadvertent damage caused during excavation. The best way to ensure that such disruptions to essential services are minimized is to ensure that the public has easy access, before any excavation occurs, to network locate services via an N11 code. In the United States, Congress and the FCC have enhanced the security of their critical network infrastructure by assigning the 811 code to network locate services. The 811 code was implemented there in 2007. The CCGA proposes that the current assignment of 811 in Canada be expanded, as described herein, to include access to locate services in addition to the current assignment for non-urgent health service.

3. More specifically, the CCGA proposes that 811 be designated for use, in each province and territory, for non-commercial access to both non-emergency medical information and one call centre locate services. Currently, 811 is used for non-emergency health services in only four provinces and one territory. Those provinces currently using 811 for health services, and any that may propose to do so in the future, could continue to use 811 as their access code. Most provinces already have locate services in operation. However, these services are accessed by the public via a confusing variety of dialling arrangements. These services would become more accessible to the public via the single, easy-to-remember 811 code. In any province where both applications are available to the public via 811, the callers would be given a clear choice between the two services and the call would be routed to the correct response center. A public education program, coordinated and designed jointly with each such province’s current 811 assignee, would inform the public, enhance public awareness of both services, increase usage by the public and thus deliver greater public benefits from the use of the 811 code.

4. In addition, as described further below, joint planning and coordination between health services and the locate services in respect of the telecommunications inputs necessary to operate such public services has the
potential to deliver cost savings and service improvements to both services. In a time when public sector budgets are under increasing constraint, these savings and efficiencies may be an important benefit.

5. Public Safety Canada has defined ten critical infrastructure sectors (See footnote 1).

   - Energy and utilities
   - Finance
   - Food
   - Transportation
   - Government
   - Information and communication technology
   - Health
   - Water
   - Safety
   - Manufacturing

6. These are strategic assets that are of national interest to all Canadians. Their continued uninterrupted operation is essential to sustain the Canadian economy and our society. They are also critical for the operations of public sector services, including the health sector. Like most other public services, many components of the health sector, such as government agencies, doctors, clinics, pharmacies, etc. cannot continue to operate for very long without energy, communications and power services. Thus, minimization of interruptions in service provided by our critical network infrastructure enhances public health, safety and security. The public expects that all reasonable available measures will be taken to protect these network assets in order to ensure reliability and continuity of essential public services.

7. The Common Ground Alliance (CGA) in the U.S. prepared a Damage Information Reporting Tool report, released in 2009. It shows a continuous decline in the number of estimated damages since 2007 (see Figure 1). In 2007, 811 was implemented nationwide in the United States for the purpose of simplifying access to one call centres in 50 states and the District of Columbia to provide information about the location of underground infrastructure. The results show that 811 has contributed to a sharp decline for the past three years in the number of U.S. estimated damages to underground infrastructure.

8. Currently there are a wide variety of ten-digit telephone numbers in Canada that must be called in order to
determine the location of underground infrastructure. There are often multiple numbers even within the
same province. The result is public confusion, lack of awareness, and thus increased disruption of essential
public services.

9. Replacing the multiple ten-digit telephone numbers with one easy-to-remember nationwide three-digit
number will greatly reduce confusion. The use of a common, national three-digit code will improve the
opportunities for enhancing and streamlining public awareness, consistency, through advertising and
education programs, thus increasing usage. The consistent public awareness messaging across the country
will result in improved public security and safety and greater public benefits from this dialling code.

About the Common Ground Alliance, the Regional Partners of the Common
Ground Alliance and the CCGA

10. The Common Ground Alliance (CGA) is a member-driven association dedicated to ensuring public safety,
environmental protection, and the integrity of services by promoting effective damage prevention practices.
In recent years, the association has established itself as the leading organization in an effort to reduce
damages to all underground facilities in North America through shared responsibility among all stakeholders.

11. In Canada, Regional Partners of the Common Ground Alliance emerged in Ontario (ORCGA) in 2003 and were followed soon after by Regional Partners in British Columbia (BCCGA), Quebec (APISQ), Alberta (ADPC), Saskatchewan (SCGA) and more recently, the Manitoba Regional Common Ground Alliance. Recognizing that each Regional Partner shared common national issues, the Regional Partners formed the CCGA in 2006 as a forum to discuss those issues and consider solutions. In late 2009, and in accordance with a new governance model, the CCGA’s primary role focused on managing damage prevention issues of national interest that Regional Partners consider best addressed through a single voice, including 3 digit dialing / 811 access to one call centres.

12. Underground infrastructure owners have long recognized their common goals to enhance public safety and improve network security and integrity. They have organized themselves into groups referred to as Regional Partners. The Regional Partners of the Common Ground Alliance in Canada are:

- Alberta Damage Prevention Council (ADPC)
- L'Alliance Pour La Protection des Infrastructures Souterraines du Québec (APISQ)
- British Columbia Common Ground Alliance (BCCGA)
- Manitoba Regional Common Ground Alliance
- Ontario Regional Common Ground Alliance (ORCGA)
- Saskatchewan Regional Common Ground Alliance

13. Cooperation in damage prevention has very strong historical roots in North America. In the U.S., it has been driven by both underground infrastructure owners and government, dating back to the 1960s. Since the mid-1990s it has gained significant momentum culminating in the Common Ground Study in 1999, the formation of the Common Ground Alliance (CGA) in 2000 and the introduction of 811 in 2007.

The Locate Request Process

14. A “locate” request refers to the process undertaken to obtain identification of and marking of the horizontal alignment of buried infrastructure by the use of above-ground markers such as temporary paint and/or flags. A request for such a locate is simply referred to as a locate request.

15. Underground infrastructure owners are responsible for providing locates either internally or through a third party locate service provider. A potential excavator, be they an organization or private individual, must notify the underground infrastructure owner of their intent to dig. The potential excavator would describe

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2 The Manitoba Regional Common Ground Alliance is to join the CCGA as a Regional Partner in 2012.
the nature of the work, the site location, and request that the potentially affected underground infrastructure be located. Potentially this would need to occur for every underground infrastructure owner known to operate in the area. To simplify this process for potential excavators, one call centres act as a centralized resource so that all member underground infrastructure owners are notified of the need for a locate with just one phone call. Every underground infrastructure owner or operator has a duty to assist the public to accurately locate underground infrastructure before any excavation begins.

**About One Call Centres**

16. A one call centre is an organization providing a communication service for multiple underground infrastructure operators—its members. Anyone proposing to excavate within a one call centre's service area can notify, at no charge, all of the one call centre's members of the intent to excavate. A request will then be made that the potentially affected infrastructure owners identify and mark the locations of their underground infrastructure in the area of the proposed excavation.

17. Underground infrastructure owners wish to simplify the process of obtaining locates for both the public and private sectors. Instead of an individual having to personally research available service providers in their area, a one call centre provides a single telephone number, generally for the entire province. Currently all one call centres in Canada are accessed via a 10-digit phone number and each number is different. The proposed 811 reassignment would eliminate multiple phone numbers, providing citizens with an easy-to-remember, simplified access to one call services for the purpose of requesting a locate.
The proposed expanded 811 assignment meets the CRTC’s N11 Criteria

18. In Telecom Decision 2001-4756 (at paragraph 44), the CRTC set out six criteria for the assignment of N11 numbers:

- there must be a compelling need for three-digit access that cannot be satisfied by other dialling arrangements or it is demonstrated that existing dialling arrangements are not suitable for accessing the needed services;
- the assignment of an unused N11 code should be to a service or services rather than a specific organization;
- the provision of N11 dialling is to be based on a need to serve the broad public interest (including providing access to the telephone network to disadvantaged individuals or groups);
- the N11 dialling should not confer a competitive advantage on the service provider(s) reached by this number;
- the services to be provided through N11 dialling are to be widely available geographically and on a full time or extended-time basis; and
- where possible, the N11 allocation to a service does not conflict with NANP and is in keeping with the CSCN guidelines for N11.

Criterion #1: A compelling need for three-digit access.

Complexity of 10-digit

19. Currently, one call centres are accessed via numerous 10-digit numbers. However, in order to properly arrange locate requests the public must keep long lists of ten-digit access numbers, varying by province and municipality. Under this system, the possibility of confusion and mistakes is greatly enhanced. Without a single, easy-to-use number, damage is far more likely to occur if a potential excavator does not call for a locate because they are not aware of the correct numbers to reach the locate services for the relevant infrastructure owners.

20. Furthermore, the Canadian workforce is increasingly mobile between provinces. Underground infrastructure owners and companies performing frequent excavations operate in multiple provinces. A nationwide number would simplify the locate request process and encourage uniform industry best practices.
Encouragement of Use

21. Designating 811 as a nationwide number will provide a catalyst for both one call centres and health information providers to join a common nation-wide initiative to enhance public health, public safety and security. Not all provinces or territories currently have a single dialling number for either of these services. If a simple three digit number is known and publicized across Canada, it will increase public accessibility and maximize public benefits from use of the 811 code. N11 codes are a very scarce public resource and their use and public benefits for Canadians should be maximized.

Harmony with U.S. 811

22. One of the public policy objectives of three digit dialling in both Canada and the U.S. is universality and simplicity in order to obtain maximum public benefits from N11 codes.

23. In 2005, the Federal Communications Commission (FCC) in the U.S. officially designated 811 as the national abbreviated dialling code to be used by state one call notification centres for providing advanced notice of excavation activities to underground facility operators in order to obtain locate services. It is worth noting that radio and television broadcasts from the U.S., including public service announcements, can often be viewed in Canada. The same applies even more so to media such as 811 promotional videos on video streaming sites such as news websites and YouTube. Having 811 associated with locate requests in Canada will increase harmony with the U.S. assignment and reduce potential confusion.

Efficiency

24. Communication with an easy-to-access one call centre is an efficient means to narrow the locate request specific to the relevant infrastructure and location. Many unnecessary locates can be avoided if the caller describes exactly what they are planning to do. One call centre operators are able to accurately and consistently identify the presence of underground assets from information provided by members. There is no substitute for a skilled operator in dialogue with the individual to ensure that accurate locate services are provided.

25. There are also potential efficiencies and savings that could accrue to provincial health departments in respect of the telecommunications and IT infrastructure systems needed to provide 811 service to the public. The broader assignment of the 811 code, as proposed herein, and collaborative public awareness efforts to design public education plans in each province that clearly identify the dual function of the 811 dialling code will lead to greater calling volumes, likely for both locate services and non-urgent health service. Purchasing telecom network services from a carrier based on a larger aggregated calling volume can lead to

http://www.youtube.com/watch?v=jHAfC02NEC4
lower costs per call. Software and hardware needed to support inbound calling could be arranged through a single supply of services contract. With the network efficiencies that can be obtained from joint planning and joint purchase of telecom/IT inputs, having regard to the pressures on provincial budgets, it may be possible for some provinces that do not currently use 811 for non-urgent health services to do so earlier than they otherwise would.

**Criterion #2 Assignment to a public service or services, not a specific organization**

26. Both proposed uses of 811 are to provide public services, namely the non-emergency health service and the locate request service. In the latter case, one call centres would be providing the service. As explained above, one-call centres exist due to a joint effort between many different private and public organizations. Their purpose is to provide locate services at no charge to any member of the public intending to perform an excavation.

27. Underground infrastructure owners may be municipal or Crown-owned or investor-owned corporations or member-owned cooperatives. All underground utility owners provide critical network services to the public, including water, heat, power, and communications. These networks support other key public services such as hospitals, schools, public security agencies, government departments and other public institutions. The integrity and uninterrupted supply of these public services should be safeguarded through all reasonably available measures.

**Criterion #3 The assignment serves the broad public interest**

28. The driving force behind this Application is the enhancement of the security of Canada’s critical underground infrastructure and improved public safety by the prevention of damage to such underground infrastructure. The CCGA submits that the 811 code could be better utilized in a way that would deliver greater public benefits. Currently, 811 is not widely available geographically with only four provinces and one territory using 811.

29. Underground infrastructure provides services that are essential to Canadian society. The infrastructure of cables and pipes that comprise this infrastructure are fixed assets valued in the billions of dollars. However, their value to sustaining the economy and our society is incalculable.

30. The proposed use of 811 is compatible with the existing assignment for non-emergency medical service. The CCGA proposal to broaden the mandate or assignment of 811 complements the current assignment by enhancing public security, public health and safety. The CCGA expects that with the assignment of 811 as a
combined national non-emergency medical and Call Before You Dig number, provinces without these services are likely to accelerate efforts to implement 811 services, thus increasing the usage and public benefit from this code.

**Criterion #4 The assignment of 811 confers no competitive advantage on any service provider.**

31. By their very nature, one call centres are not competitive. There are no locate service providers that are being excluded. Every infrastructure owner / operator is permitted and encouraged to join. Furthermore, by joining in a common provincial one call centre, each participating network operator can achieve savings and efficiencies that would not occur if each acted separately.

**Criterion #5 The proposed 811 services will be widely available geographically and on an extended time basis.**

32. Currently, 811 for health information is only available in four provinces and one territory. In the other six provinces and two territories, this scarce N11 resource is not being used and hence there are no public benefits produced by this resource. The proposed broader assignment for 811 will result in more services more widely available to Canadians than with the current single use.

There are one call centres in:

- Alberta
- British Columbia
- Ontario
- Quebec
- Saskatchewan
- City of Saint John, NB

Non-emergency medical info services via 811 are currently available in:

- British Columbia
- New Brunswick
- Nova Scotia
- Quebec
- Yukon

33. It should be noted that the only overlaps that currently exist are in British Columbia and Quebec. With shared use, the number of provinces and territories using 811 will increase from five to nine.
34. One call centres are prepared to move quickly to implement 811 upon its assignment by the CRTC. Alberta One-Call has stated that it would be prepared to revise its advertising from the present 1-800 number to 811 within a few months.

**Criterion #6 No conflict with the NANP (North American Numbering Plan) or CSCN (Canadian Steering Committee on Numbering).**

35. As noted above, the U.S. has already assigned 811 for the purpose of obtaining network infrastructure locate services. The NANP acknowledges that non-urgent medical info services are already provided in some provinces in Canada. The proposed assignment fits within the current designations and does not conflict with guidelines set out in the NANP.
Consultation with Stakeholders

36. Prior to submission of this Application, the Canadian Common Ground Alliance initiated consultations with many representatives from provincial Health Ministries and / or 811 assignees to provide information in advance regarding the reasons for the Application. In the four provinces where 811 is currently in use (British Columbia, Quebec, Nova Scotia and New Brunswick), the CCGA felt it appropriate, subject to availability of provincial representatives, to arrange consultations in person. In-person consultation was also offered in those provinces where the Common Ground Alliance has regional chapters (British Columbia, Alberta, Saskatchewan, Manitoba, Ontario and Quebec). The CCGA’s decision to consult directly with many provincial representatives reflects the fact that, in the event the Application is approved, the CCGA will be entering into a long-term relationship with many of these provincial departments and services. The CCGA wished to demonstrate its commitment to cooperatively enhance public safety by broadening the services offered via 811 to the public in Canada.

37. In each case, Health Ministry / 811 representatives were provided with background information about the Common Ground Alliance both in Canada and in the United States and about the successful implementation of 3 digit one call centre access in the U.S. The CCGA presented its view that implementing 3 digit one call centre access in Canada would produce similar public benefits and would likely set the stage for broader adoption and use of one call centres in every province. The CCGA also noted that health care, like other essential public services, relies on the continuity and integrity of critical buried infrastructure to maintain services to the public. In that regard, joint use of 811 as proposed by the CCGA would provide greater assurance of service continuity and thus improved public health, safety and security.

38. In the provinces where 811 is now in use, the CCGA’s goal is to cooperate in the joint use of this number so as to enhance public safety through increased use of 811. In the six provinces where 811 code is not benefitting the public because the number is not in use, the CCGA confirmed that it would be prepared to facilitate and implement joint use whenever provincial Health Authority expressed an interest in doing so. As noted above under Criterion 1, if there is a willingness to plan jointly, the provinces and the one call centre access can both achieve savings and efficiencies in telecom/IT services if they work together in planning their networks and calling centers. This may assist some provinces to implement 811 health information service earlier than might otherwise be the case.

39. The following table provides the dates and locations of the CCGA’s consultations to date with provincial Health representatives.
<table>
<thead>
<tr>
<th>Location / Province</th>
<th>Date</th>
<th>Consultation manner</th>
<th>CCGA Representative</th>
</tr>
</thead>
</table>
| Alberta             | June 28 | In person           | • Mike Sullivan – Chair, CCGA  
• Brad Watson – Chair ADPC |
| British Columbia    | May 27  | In person           | • Dr. Dave Baspaly – Executive Director, BCCGA  
• Abigail Fulton – BCCGA Board Member, Excavator Stakeholder Rep, and Past President |
| Manitoba            | June 8  | In person           | • Shannon Neufeld – MCGA / Manitoba Hydro |
| Northwest Territories| July 8  | Phone               | • Mike Sullivan – Chair, CCGA |
| New Brunswick       | June 7  | In person           | • Mike Sullivan – Chair, CCGA |
| Newfoundland        | June 16 | Phone               | • Mike Sullivan – Chair, CCGA |
| Nova Scotia         | June 8  | In person           | • Mike Sullivan – Chair, CCGA |
| Nunavut             | June 29 | Phone               | • Mike Sullivan – Chair, CCGA |
| Ontario             | June 27 | In person           | • Mike Scarland - Manager Damage Prevention - Enbridge Gas Distribution  
• Ben Hamilton - Manager Government Relations - Enbridge Gas Distribution |
| Prince Edward Island| June 14 | Phone               | • Mike Sullivan – Chair, CCGA |
| Quebec              | July 14 | Phone               | • Mike Sullivan – Chair, CCGA  
• Nathalie Moreau – Executive Director, APISQ |
| Saskatchewan        | June 5  | Phone and written correspondence  
• Dean Reeve – Executive Director, SCGA |
| Yukon               | June 6  | Phone               | • Dr. Dave Baspaly – Executive Director, BCCGA  
• Mike Sullivan – Chair, CCGA |
Complementing Other N11 Users

40. It should also be noted that the proposed shared use of 811 may result in collateral or complementary benefits to 911 emergency services:

1. Enhanced public awareness and promotion of 811 will likely increase call volumes to non-emergency medical call centres, thus reducing the number of unnecessary and wasteful non-emergency medical calls to 911.

2. If individuals do not receive timely and accurate information about the location of underground infrastructure before excavation, excavation damages are far more likely and may result in a 911 call for emergency response service (e.g. fire, explosion, injury, etc.). Accidental damage to communications networks may also disrupt telephone access by the public to 911 services.

3. Emergency responders dispatched by 911 services may, in some cases, require the exact location of underground infrastructure for their own safety and that of the general public. 811 locate services can provide emergency responders with improved access to accurate information regarding buried infrastructure, thus enhancing their safety.
Implementation Plans, Roll out, etc.

41. If the CRTC approves the assignment of 811 as proposed for both non-emergency medical and infrastructure locate request services, the CCGA intends to coordinate discussions on a province-by-province basis with all affected service providers. This includes, of course, coordination with each provincial government.

42. Consistent with the Commission’s general framework for N11 numbers, 811 service providers in each province would indicate the timing of their readiness to implement an 811 system. The service providers in each province will be required to inform their telecommunications carriers of their readiness to use the 811 number, giving the standard advance notice as prescribed by the CRTC. Prior to introduction of 811 service, informal discussions with the carriers would occur well in advance.

43. In any province where both non-urgent health service and infrastructure locate services are accessible via the 811 code, a caller would be given a clear choice using an IVR system. Pressing '1' will route the call to non-emergency medical information service, and pressing '2' will route the call to network locate request services. **Health services would always be presented as the first option in any location where both services are available.** Consistency of this numbering scheme is essential to the goal of simplicity and enhanced public awareness. In provinces where only one of these services operates (e.g. health services only), an 811 call will be routed directly to that service. As soon as both a one call centre and non-emergency medical info service are operating in a given province, the caller option described above will be implemented.

44. The CCGA anticipates that the standard technical arrangements prescribed by the Commission for other N11 numbers would also apply to the broader assignment of 811. As in previous N11 cases, following the notice period prescribed by the Commission, carrier switches would be programmed to route all calls to a single point. The IVR system and any subsequent routing of calls to a single location or multiple locations, would be arranged and paid for by the 811 service providers. As is the case today, interexchange services to provide the public with province-wide calling would be purchased from one of the carriers. Although none are anticipated, if any technical issues with the carriers were to arise, the CCGA would expect that, consistent with the Commission’s direction in Telecom Decision 2001-475 (at paragraph 106), these could be resolved through the CISC process.
Public Communication

45. Subsequent to a CRTC decision to broaden the assignment of 811, the CCGA and its Regional Partners propose to build greater public awareness of 811. Advertising and publicity campaigns would be developed collaboratively in conjunction with each provincial health department.

46. The 811 number has become a highly visible symbol and logo in the U.S. on buildings, vehicles, and individuals. It has instilled a sense of cooperation amongst a variety of underground network utility owners. In Canada, a campaign adapted to each province can increase public awareness and thus usage of 811 services. The CCGA is committed to working with the provinces and all infrastructure network operators to enhance public awareness in Canada of the services accessible via 811.
Conclusion

47. The 811 dialling code, like all N11 codes, is a very scarce public resource. Its assignment and use should be optimized to deliver the maximum benefits to Canadians. The CCGA submits that this code is capable of delivering greater public benefits to Canadians by broadening the current assignment. By expanding its use, as described above, the Commission can enhance the safety and security of Canada’s critical national infrastructure. These networks are essential to the health, safety and security of individuals and our society. Governments and the private sector are highly dependent on the uninterrupted operation of these network services. Furthermore, Canadians expect that all reasonable available measures will be implemented to safeguard the security and continuity of these critical services. For all of these reasons, and those set out above, the CCGA urges the Commission to broaden the assignment of the 811 dialling code.
Appendix A  Canadian Common Ground Alliance (CCGA) Members

- Alberta Damage Prevention Council (ADPC)
- Alliance Pour La Protection des Infrastructures Souterraines du Québec (APISQ)
- BC Common Ground Alliance (BCCGA)
- Manitoba Regional Common Ground Alliance
- Ontario Regional Common Ground Alliance (ORCGA)
- Saskatchewan Regional Common Ground Alliance (SCGA)
- Canadian Construction Association
- Canadian Energy Pipeline Association
- Canadian Nursery Landscape Association
- John Deere Limited
Appendix B    Canadian Common Ground Alliance (CCGA) Sponsors

- Bell Canada
- Alliance Pipeline Ltd.
- TransCanada PipeLines Limited
- Kinder Morgan Canada
- Enbridge Pipelines Inc.
Appendix C   Common Ground Alliance (CGA) Regional Partners

Please note that the organizations listed for each of the regional partners are companies, government departments and agencies, and other associations. The associations in turn represent many other companies, government departments and agencies, and other associations.

• Alberta Damage Prevention Council (ADPC) Members:

• BC Common Ground Alliance (BCCGA) Members:
  o http://www.commongroundbc.ca/?page_id=8

• Ontario Regional Common Ground Alliance (ORCGA) Homepage:
  o http://www.orcga.com/home.asp

• Alliance Pour La Protection des Infrastructures Souterraines du Quebec (APISQ) Homepage:
  o http://www.apisq-qcga.ca/

• Saskatchewan Regional Common Ground Alliance (SCGA) Homepage:
  o http://www.scga.ca/index.html
Appendix D  U.S. 811 Communication Samples

The nationwide assignment of 811 in the United States has led to a successful public communication campaign, in part due to the ease of incorporating a 3-digit-number on a variety of public spaces.

Figure 2: 811 on a gas pipeline marker showing versatility of logo in small spaces

Figure 3: Promotion of the 811 public service at a well attended event

Figure 4: Graphic used by a company shared with both customers and employees

Figure 5: Single 3-digit-number visible on a participating company’s structure in a highly visible area
Figure 6: Logo catered to a specific state

Figure 7: Advertisement using creative design

Figure 8: Advertisement incorporating humour

Figure 9: Graphic promoting the shared use aspect of 811
Appendix E  Letters of Support

Appended to this Application are letters of support from the following 30 organizations:

- Alberta Damage Prevention Council
- Alberta One-Call Corporation
- Alliance Pipeline Ltd.
- ATCO Gas
- ATCO Pipelines
- BC One Call Limited
- BP Canada Energy Company
- Canadian Association of Fire Chiefs
- Canadian Association of Geophysical Contractors
- Canadian Association of Petroleum Producers
- Canadian Construction Association
- Canadian District Energy Association
- Canadian Electricity Association
- Canadian Energy Pipeline Association
- Canadian Gas Association
- Canadian Public Works Association
- Enbridge Gas Distribution Inc.
- Enbridge Pipelines Inc.
- Gaz Métro
- Heavy Civil Association of Newfoundland and Labrador Inc.
- Hydro-Quebec
- Info-Excavation (Quebec’s One-Call Centre)
- John Deere Limited
- Kinder Morgan Canada Inc.
- Ontario One Call
- Saint John One Call
- Sask 1st Call
- Spectra Energy Transmission
- TransCanada
- Union Gas Limited
June 23, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON2

Re: Support for CCGA Application for Shared Use of 811

The Alberta Damage prevention Council (ADPC) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure— including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited NII resources.

The Alberta Damage Prevention Council is a Regional Partner of the Common Ground Alliance and a committee of the Alberta Chapter of the American Public Works Association. We have been actively involved in enhancing the buried facility damage prevention process in Alberta for over 30 years. Membership includes representatives from local damage prevention committees, stakeholder industry associations, buried facility owners, locators, equipment manufacturers, excavators, regulatory agencies, training organizations and the one-call centre. In the absence of specific damage prevention or one-call legislation in Alberta, the ADPC has assumed the role of manager of industry standards related to the damage prevention process.
Our Mission;"In the spirit of cooperation, this Council is dedicated to the minimizing of damages caused to utilities from unauthorized contacts and to promotion of safe working environments for all agencies involved in development and construction”.

In conclusion, ADPC supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

[Signature]

R (Bruce) Partington
Chair Alberta Damage Prevention Council

cc. Canadian Common Ground Alliance
19 May 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON2

Re: Support for CCGA Application for Shared Use of 811

Alberta One-Calf Corporation supports the Canadian Common Ground Affiance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure— including hospitals, energy, telecommunications, air traffic control, banking, and emergency response— constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited 811 resources.

Alberta One-Calf Corporation is a non-profit organization, with over 700 members that operate probably more than 85% of the estimated 4,500,000 km of underground infrastructure in Alberta. The mission of Alberta One-Calf is to prevent damage to buried facilities through education, advocacy, public awareness and dependable, cost-effective communication and exchange of information between members and those intending to disturb the ground in the interests of worker safety, public safety, protection of the environment and preservation of the integrity of the

Alberta One-Call Corporation
104,4242 7 Street SE
Calgary, Alberta T2G 2Y8
Telephone: (403) 531-3700
Fax: (403) 531-3703
www.alberta1call.com
underground infrastructure that provides goods and services essential to today's society. In operation since 1984, Alberta One-Call processes upwards of 450,000 locate requests per year of which some 20% are from homeowners.

In conclusion, Alberta One-Call Corporation supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada's critical infrastructure.

Sincerely,

Robert R. Chisholm, P.Eng.
President

cc. Canadian Common Ground Alliance
June 24, 2011

Mr. Robert A Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N

Re: Support for CCGA Application for Shared Use of 811

Alliance Pipeline Limited supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada, to facilitate public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

Excavation by homeowners and commercial excavators constitutes the greatest risk to Canada’s critical underground infrastructure. Currently, Canadians must call a variety of ten-digit telephone numbers to determine the location of underground infrastructure. The result is public confusion, lack of awareness and increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

The Alliance Pipeline system consists of an approximately 2,311-mile integrated Canadian and U.S. high pressure natural gas transmission pipeline system, delivering rich natural gas from the Western Canadian Sedimentary Basin and the Williston Basin to the Chicago market hub. The United States portion of the system is owned and operated by Alliance Pipeline L.P. and consists of approximately 900 miles of mainline and related infrastructure.
The system has been in commercial service since December 2000 and delivers, on average, about 1.6 billion standard cubic feet (or 45.3 million standard cubic metres) of natural gas per day. Alliance has one of the best safety and performance records in the natural gas transmission industry. More information about the company is available at www.alliancepipeline.com.

In conclusion, Alliance Pipeline supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety and ultimately help protect Canada's critical infrastructure.

Sincerely,

Harold Kraft, P.Eng.
Vice President, Engineering & Construction
Alliance Pipeline Limited

cc. Canadian Common Ground Alliance
July 5, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON2

Re: Support for CCGA Application for Shared Use of 811

ATCO Gas supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada's critical infrastructure - including natural gas distribution and transmission pipelines, hospitals, energy, telecommunications, air traffic control, banking, and emergency response - constitute valuable strategic assets benefitting all Canadians. Much of Canada's critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity, reliability and safety of Canada's critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada's critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground facilities. The result is public confusion, lack of awareness, the potential for serious injury and property damage to occur, and an increased likelihood of disruption of essential public services.

The solution, in our view, is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC.

ATCO Gas is an Alberta based, province-wide natural gas distribution company serving more than one million municipal, residential, business and industrial customers in nearly 300 Alberta communities. Headquartered in Edmonton, Alberta ATCO Gas has approximately 2000 employees located in more than 60 district offices across the province who build, operate and maintain an extensive network of distribution pipelines to provide safe, reliable natural gas service to customers.

Sincerely,

Brian R. Hahn
President, ATCO Gas

cc. Canadian Common Ground Alliance
June 30, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A 0N

Re: Support for CCGA Application for Shared Use of 811

ATCO Pipelines supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefiting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to our critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple telephone numbers that must be called in Alberta to determine the location of various underground utility infrastructure. It is not currently mandatory for all utility providers in the province to participate. The result is public confusion, lack of awareness, and thus increased potential for disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Part of the ATCO Group of Companies, ATCO Pipelines provides reliable and efficient delivery of natural gas in Alberta and is committed to operational excellence and superior customer service while ensuring the safety of our employees and the public.

In conclusion, ATCO Pipelines supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Brendan Dolan  
Sr. Vice President & General Manager  
ATCO Pipelines

cc. Canadian Common Ground Alliance
Re: Support for CCGA Application for Shared Use of 811

BC One Call Ltd. supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

BC One Call is a province-wide non-profit organization established in 1994 to provide the excavating community, including contractors and homeowners, with a means to request information on the location of underground services which may be on their worksite prior to any ground disturbance or digging.

In conclusion, BC One Call Ltd. supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

[Signature]

Chris Hyland
President and CEO
BC One Call Ltd.

cc. Canadian Common Ground Alliance
June 30, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON

Re: Support for CCGA Application for Shared Use of 811

BP Canada Energy Company supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure— including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited NII resources.

BP Canada Energy Company is part of the BP p.l.c. group of companies which operates across six continents, in over 80 countries. Headquartered in Calgary, Alberta, we are active in three provinces and the Northwest Territories, while our marketing and trading activities span the nation and expand into the US.

Our interests include joint ventures in three in situ oil sands opportunities in Northern Alberta. We also hold licences in the Canadian Beaufort Sea and the Mackenzie Delta.

The BP group BP’s shares are traded under the symbol BP on the London and New York stock exchanges.
In conclusion, BP Canada Energy Company supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada's critical infrastructure.

Sincerely,

Robert Wong
Pipeline Integrity Management System Director

cc. Canadian Common Ground Alliance
February 28, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N

Re: Support for CCGA Application for Shared Use of 811

The Canadian Association of Fire Chiefs supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

The Canadian Association of Fire Chiefs is an independent, non-profit association with a voluntary membership representing over 1,000 Chief Fire Officers across Canada (www.cafc.ca).

In conclusion, the Canadian Association of Fire Chiefs supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Rob Simonds, CFO
President, Canadian Association of Fire Chiefs

cc. Canadian Common Ground Alliance
Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A ON2  

May 20, 2011  

Re: Re: Support for CCGA Application for Shared Use of 811  

The Canadian Association of Geophysical Contractors (CAGC) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.  

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.  

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.  

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.  

The Canadian Association of Geophysical Contractors (CAGC) is the voice of business in the Canadian Seismic Industry. Working pro-actively, the CAGC develops and maintains a business environment in which Geophysical and Support Industries can earn a fair rate of return on invested capital and provide new employment opportunities for Canadians.
Our members are part of the $120-billion-a year oil and natural gas industry that affects the lives of every Canadian. Petroleum and the products made from it play a vital role in our daily lives. In addition to providing heating and transportation fuels, oil and natural gas are the main building blocks for an endless list of products - from clothing and carpets, to medicines, glues and paints.

Working closely with our members, governments, communities and stakeholders, CAGC develops and administers programs and training to ensure worker health and safety, while advocating the highest of ethical standards in the conduct of all business throughout the geophysical industry.

By endeavoring to self-regulate our business activities, where feasible, our aim is to minimize the public expense of governing our industry. We also strive to achieve consensus on industry codes of practice and operating guidelines that meet or exceed government standards.

With active participation from our members, the CAGC continues to promote the Canadian geophysical industry as a world leader in development and application of advanced exploration technologies and take pride in promoting protection of the natural environment in all aspects of geophysical operations.

Membership Profile (consists of 518 member):

- Association
- Buried Facility Locators Individuals
- Buried Facility Locators Instructor
- Chainsaw Instructors - Basic
- Chainsaw Instructors - QST
- Consultant
- Data Acquisition
- Data Recording
- Drilling (Seismic)
- Geophysical Land and Field Services
- Line Cutting
- Oil Company
- Pipeline Locator
- Service and Supply
- Seismic Field Operations Supervisor Individual
- Seismic Permit Agent Individual
- Speculative Seismic
- Survey
In conclusion, Canadian Association of Geophysical Contractors supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Please let me know.

Sincerely

[Signature]

Mike Doyle
CAGC President
July 6, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A 0N

Dear Mr. Morin:

Re: Support for CCGA Application for Shared Use of 811

The Canadian Association of Petroleum Producers (CAPP) represents companies, large and small, that explore for, develop and produce natural gas and crude oil throughout Canada. CAPP’s member companies produce more than 90 per cent of Canada’s natural gas and crude oil. CAPP's associate members provide a wide range of services that support the upstream crude oil and natural gas industry. Together CAPP's members and associate members are an important part of a national industry with revenues of about $100 billion-a-year. CAPP’s mission is to enhance the economic sustainability of the Canadian upstream petroleum industry in a safe and environmentally and socially responsible manner, through constructive engagement and communication with governments, the public and stakeholders in the communities in which we operate.

CAPP supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.
The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

In conclusion, CAPP supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Rick Laursen
Manager, Health and Safety

cc. Canadian Common Ground Alliance

#192642
June 21, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON2

Re: Support for CCGA Application for Shared Use of 811

Dear Mr. Morin:

I am writing on behalf of the Canadian Construction Association (CCA) in support of the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada's critical infrastructure—including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefitting all Canadians. Much of Canada's critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada's critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada's critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada's limited N11 resources.

The CCA is the national voice of the non-residential sector in Canada. With more than 17,000 members across the country, CCA members are responsible for the construction and maintenance of billions of dollars of commercial, industrial and institutional assets annually. As a whole, the construction industry is responsible for the employment of 1.26 million Canadians and accounts for more than 7 per cent of Canada's overall gross domestic product (GOP). As such, construction has become a cornerstone industry of the Canadian economy.

In conclusion, CCA supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada's critical infrastructure.

Sincerely,

Michael Atkinson
President

cc. Canadian Common Ground Alliance
Thursday July 14, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON2

Re: Support for CCGA Application for Shared Use of 811

The Canadian District Energy Association (CDEA) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

The CDEA is an industry association representing district energy owners, energy utilities, government agencies, building owners, consulting engineers, suppliers, developers, bankers, and investors who share a common interest in promoting the growth of district energy in Canada.

In conclusion, the CDEA supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Mary Ellen Richardson
President, CDEA

cc. Canadian Common Ground Alliance
May 31, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Central Building Les Terrasses de la Chaudière  
1 Promenade du Portage  
Gatineau, Quebec  K1A 0N2

Re: Support for CCGA Application for Shared Use of 811

Dear Sir:

The Canadian Electricity Association (CEA) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, water, telecommunications, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy, water, sewage and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Founded in 1891, CEA is the national forum and voice of the evolving electricity business in Canada. CEA contributes to the regional, national and international success of its members through the delivery of quality, value-added services. At the heart of CEA is a core of corporate utility member companies representing all regions of Canada.

In conclusion, CEA supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Pierre A. Guimond  
President and Chief Executive Officer

cc. Canadian Common Ground Alliance
May 30, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario K1A ON2

Dear Mr. Morin

Re: Support for CCGA Application for Shared Use of 811

The Canadian Energy Pipeline Association (CEPA) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, industrial facilities such as on transmission facilities, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in our national interest to protect and maintain the integrity and reliability of these assets. Furthermore, it is Canadians’ expectations that all reasonable measures be taken to ensure public safety.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is a single nationwide three-digit telephone number for Call Before You Dig in Canada similar to the one established in the US. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will not only eliminate confusion but will ultimately protect human life and the environment. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

The Canadian Energy Pipeline Association (CEPA) represents Canada’s transmission pipeline companies. Our members are world leaders in providing safe, reliable long-distance energy transportation. Transmission pipelines transport nearly all of Canada’s daily crude oil and natural gas production from producing regions to markets throughout Canada and the United States. CEPA is dedicated to ensuring a strong and viable transmission pipeline industry in a manner that emphasizes public safety and pipeline integrity, social and environmental stewardship, and cost competitiveness.

In conclusion, CEPA supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Brenda Kenny
President & CEO

c.c.: Canadian Common Ground Alliance
June 27, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A ON2  

Re: Support for CCGA Application for Shared Use of 811

Dear Mr. Morin,

The Canadian Gas Association (CGA) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada's critical infrastructure—including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefiting all Canadians. Much of Canada's critical energy and telecommunications infrastructure is underground supporting public safety, national security, and sustaining the Canadian economy. It is in the interest of all Canadians to protect and maintain the integrity and reliability of this infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada's critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of pipes and wires. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We believe that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada's limited NII resources.

The Canadian Gas Association represents the companies involved in the delivery of natural gas to Canadian customers. An essential part of our daily lives, natural gas heats and cools our homes and businesses, generates electricity, fuels vehicles and powers appliances and devices. Natural gas is growing in popularity because it is versatile, reliable, affordable, clean and safe. With over 480,000 kilometres of mostly buried pipeline across the country, Canada's natural gas industry delivers smart energy solutions to more than six million homes, businesses and
institutions. This represents 30% of Canada's energy needs today.

In summary, the Canadian Gas Association supports the CCGA application for shared use of 811 in Canada. We strongly believe that by thus helping protect Canada's critical infrastructure, we will significantly enhance public awareness of that infrastructure, and in so doing increase public safety.

Sincerely,

Timothy M. Egan  
President and CEO

cc. Canadian Common Ground Alliance
Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A ON  

March 1, 2011  

Re: Support for CCGA Application for Shared Use of 811  

The Canadian Public Works Association (CPWA) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

As public works professionals, CPWA’s 2000 members across Canada play an integral role in providing the vital services, and developing and maintaining the infrastructure that makes our communities healthy places in which to live, work, play, and invest.

In conclusion, the Canadian Public Works Association supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Darwin K. Durnie, President  
Canadian Public Works Association  

cc: Canadian Common Ground Alliance
June 17, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A ON2

Re: Support for CCGA Application for Shared Use of 811

Enbridge Gas Distribution supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure—including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently, there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. Enbridge Gas Distribution agrees that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Enbridge Gas Distribution is the largest natural gas utility in Canada with about 1.95 million customers across Southern Ontario, South Western Quebec and New Brunswick. Enbridge is committed to providing safe and reliable delivery of natural gas.

In conclusion, Enbridge Gas Distribution supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Janet Holder  
President

cc. Canadian Common Ground Alliance
June 22, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-Television and Telecommunications Commission
Ottawa, Ontario K1A 0N

Dear Mr. Morin:

Re: Support for CCGA Application for Shared Use of 811

Enbridge supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-Television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Enbridge Inc., a Canadian company, is a North American leader in delivering energy and one of the Global 100 Most Sustainable Corporations. As a transporter of energy, Enbridge operates, in Canada and the U.S., the world's longest crude oil and liquids transportation system. The Company also has a growing involvement in the natural gas transmission and midstream businesses, and is expanding its interests in renewable and green energy technologies including wind and solar energy, hybrid fuel cells and carbon dioxide sequestration. As a distributor of energy, Enbridge owns and operates Canada's largest natural gas distribution company, and provides distribution services in Ontario, Quebec, New Brunswick and New York State. Enbridge employs approximately 6,400 people, primarily in Canada and the U.S. and is ranked as one of Canada's Greenest Employers, and one of the Top 100 Companies to Work
for in Canada. Enbridge's common shares trade on the Toronto and New York stock exchanges under the symbol ENB. For more information, visit enbridge.com.

Enbridge is Canada’s largest transporter of crude oil, with approximately 24,613 kilometres (15,294 miles) of crude pipeline, delivering on average more than 2.2 million barrels per day of crude oil and liquids.

• We export 69 per cent of Western Canadian oil, which represents 13 per cent of U.S. daily crude oil imports.

• On any single day, Enbridge is the largest single conduit of oil into the U.S.

• We move close to 100 separate commodities, including more than 100 types of refined products.

• Our products include conventional crude oil, synthetic crude oil, condensates, natural gas liquids and refined products such as gasoline, heating oil, aviation and diesel fuel.

In conclusion, Enbridge supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Todd Romaine
Manager Land & ROW

cc. Canadian Common Ground Alliance
Re: Support for CCGA Application for Shared Use of 811

Dear Mr. Morin:

Gaz Metro supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefiting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited 811 resources.

With over $3.6 billion in assets, Gaz Metro is Quebec’s leading natural gas distributor. Its 10,000-kilometre network serves 300 municipalities. Gaz Metro has operated in this regulated industry since 1957 and is the trusted energy provider to more than 180,000 customers in Quebec and 45,000 customers in Vermont, who choose natural gas for its competitive price, efficiency, comfort and environmental benefits. Gaz Metro is also present in the electricity distribution market, with nearly 90,000 customers in Vermont, and is involved in natural gas transportation and storage, the development of projects such as wind power, natural gas as fuel for the transportation industry and biomethanation. Gaz Metro is committed to the satisfaction of its customers, its partners, its employees and the communities it serves. www.gazmetro.com

In conclusion, Gaz Metro supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Gaz Metro

cc. Canadian Common Ground Alliance

life in blue
June 24, 2011

Mr. Robert A Morin
Secretary General
Canadian Radio-Television and Telecommunications Commission
Ottawa, ON   KIA ON2

RE: Support for CCGA Application for Shared Use of 811

Heavy Civil Association of Newfoundland and Labrador (HCANL) supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada's critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking and emergency response – constitute valuable strategic assets benefiting all Canadians. Much of Canada's critical energy and telecommunications infrastructure is underground, supporting public safety, national security and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada's critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada's critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada's limited NII resources.

HCANL is an influential organization who represents 121 member companies interest in meetings and discussions with Government Departments and Agencies, Municipal Councils, with the Engineering Profession and the General Public.
In conclusion HCANL supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety and ultimately help protect Canada's critical infrastructure.

Dan Spracklin, C.E.T.
President

cc. Canadian Common Ground Alliance
Mardi, le 14 juin 2011

Mr. Robert A. Morin
Secrétaire Général
Conseil de la radiodiffusion et des télécommunications canadiennes
Ottawa, Ontario K1A 0N

Re : Soutien à la demande du CCGA pour une utilisation partagée du 811

Hydro-Québec soutient la demande du Common Ground Alliance Canadien (CCGA) au Conseil de la radiodiffusion et des télécommunications canadiennes (CRTC) pour une utilisation partagée du 811 au Canada qui permettrait l'accès aux services médicaux non urgents et la fonction « Appeler avant de creuser ».

Un bon nombre d’institutions Canadiennes, qui rendent des services indispensables à la qualité de vie de nos concitoyens – hôpitaux, corps policiers, pompiers, nos forces armées, notre système bancaire, le contrôle du trafic aérien pour ne nommer que ceux-là, doivent elles-mêmes compter sur des sources d’énergie et des moyens de communications qui leurs parviennent généralement via une toile complexe de réseaux souterrains. C'est dans l'intérêt de tous les Canadiens de protéger et de préserver l'intégrité et la fiabilité des réseaux souterrains afin de maintenir la qualité des services que nous recevons. Nos concitoyens s’attendent à ce que toutes les mesures raisonnables soient prises afin que cela soit ainsi.

Au Canada, la plus grande menace à l’intégrité des réseaux souterrains demeure les travaux d’excavation effectués par les propriétaires de résidences, les entrepreneurs et les municipalités. Il existe présentement un nombre très élevé de numéros de téléphone à dix chiffres qui permettent d’obtenir des informations sur l’emplacement des multiples infrastructures souterraines qui peuvent se retrouver à proximité d’un projet d’excavation. Il en résulte une certaine confusion, un obstacle qui empêche de proposer au public une procédure simple à suivre. Cette situation mène inévitablement à une croissance de dommages.

La solution est un numéro de téléphone à trois chiffres pan Canadien permettant d’Appeler avant de creuser, tel que proposé dans la demande du CCGA au CRTC.
Remplacer les multiples numéros de téléphone à dix chiffres avec un numéro de trois chiffres au niveau national éliminera toute confusion et permettra la mise en place d'une procédure similaire d'un bout à l'autre du pays. Un avantage énorme considérant la mobilité croissante de nos travailleurs. Nous sommes convaincus que l'utilisation partagée du 811 est la meilleure solution, permettant d'accéder plus facilement aux centres d'appels provinciaux et maximisant l’utilisation des ressources limitées de N11 au Canada.

Hydro-Québec est un important distributeur, transporteur et producteur d'électricité en Amérique du Nord. Elle exploite essentiellement des énergies renouvelables, plus particulièrement l'hydroélectricité. Elle compte près de 20 000 km en infrastructures souterraines sur l’ensemble du territoire québécois.

En conclusion, Hydro-Québec appuie la demande du CCGA visant une utilisation partagée du 811 au Canada. Nous croyons fermement qu'en atteignant cet objectif, la sensibilisation du public sera grandement facilitée, que la sécurité de nos citoyens sera accrue et que finalement, l'intégrité de nos infrastructures souterraines sera mieux préservée.

Sincèrement,

Michel Hudon
Directeur –Expertise et soutien à la réalisation des travaux
Hydro-Québec Distribution
Re : Soutien à la demande du CCGA pour une utilisation partagée du 811

Info-Excavation soutient la demande du Common Ground Alliance Canadien (CCGA) au Conseil de la radiodiffusion et des télécommunications canadiennes (CRTC) pour une utilisation partagée du 811 au Canada qui permettrait l'accès aux services médicaux non urgents et la fonction « Appeler avant de creuser ».

Un bon nombre d’institutions Canadiennes, qui rendent des services indispensables à la qualité de vie de nos concitoyens – hôpitaux, corps policiers, pompiers, nos forces armées, notre système bancaire, le contrôle du trafic aérien pour ne nommer que ceux-là, doivent elles-mêmes compter sur des sources d’énergie et des moyens de communications qui leurs parviennent généralement via une toile complexe de réseaux souterrains. C'est dans l'intérêt de tous les Canadiens de protéger et de préserver l'intégrité et la fiabilité des réseaux souterrains afin de maintenir la qualité des services que nous recevons. Nos concitoyens s’attendent à ce que toutes les mesures raisonnables soient prises afin que cela soit ainsi.

Au Canada, la plus grande menace à l’intégrité des réseaux souterrains demeure les travaux d’excavation effectués par les propriétaires de résidences, les entrepreneurs et les municipalités. Il existe présentement un nombre très élevé de numéros de téléphone à dix chiffres qui permettent d’obtenir des informations sur l’emplacement des multiples infrastructures souterraines qui peuvent se retrouver à proximité d’un projet d’excavation. Il en résulte une certaine confusion, un obstacle qui empêche de proposer au public une procédure simple à suivre. Cette situation mène invariablement à une croissance de dommages.

La solution est un numéro de téléphone à trois chiffres pan Canadien permettant d’Appeler avant de creuser, tel que proposé dans la demande du CCGA au CRTC. Remplacer les multiples numéros de téléphone à dix chiffres avec un numéro de trois chiffres au niveau national éliminera toute confusion et permettra la mise en place d’une
procédure similaire d’un bout à l’autre du pays. Un avantage énorme considérant la mobilité croissante de nos travailleurs. Nous sommes convaincus que l'utilisation partagée du 811 est la meilleure solution, permettant d'accéder plus facilement aux centres d'appels provinciaux et maximisant l’utilisation des ressources limitées de N11 au Canada.

Info-Excavation est le centre d’appels qui dessert l’ensemble du territoire québécois. Elle compte près de 160 entreprises et municipalités membres et traite plus de 170 000 demandes de localisation annuellement.

En conclusion, Info-excavation appuie la demande du CCGA visant une utilisation partagée du 811 au Canada. Nous croyons fermement qu'en atteignant cet objectif, la sensibilisation du public sera grandement facilitée, que la sécurité de nos citoyens sera accrue et que finalement, l’intégrité de nos infrastructures souterraines sera mieux préservée.

Sincèrement,

Robert Jutras
Directeur général
Info-Excavation
VIA FACSIMILE 1-819-994-0218
& VIA REGULAR MAIL

April 25th, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON

Re: Support for CCGA Application for Shared Use of 811

John Deere Limited supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada's critical infrastructure — including hospitals, energy, telecommunications, air traffic control, banking, and emergency response — constitute valuable strategic assets benefitting all Canadians. Much of Canada's critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada's critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada's critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada's limited NII resources.

In the United States, John Deere has been recognized for its stellar support of the Common Ground Alliance (CGA) and their important "Call 811 Before You Dig" safety message across
the country. In addition to our annual financial commitment to CGA in the U.S., we promote 811 in our magazines and advertising campaigns, and partnered with CGA to ring the closing bell at the New York Stock Exchange in August 2010 to raise awareness for "National 811 Day".

John Deere Limited is a wholly owned subsidiary of Deere & Company (NYSE: DE). Deere & Company is a world leader in providing advanced products and services and is committed to the success of customers whose work is linked to the land - those who cultivate, harvest, transform, enrich and build upon the land to meet the world's dramatically increasing need for food, fuel, shelter and infrastructure. Since 1837, John Deere has delivered innovative products of superior quality built on a tradition of integrity. For more information, visit John Deere at its worldwide website at www.JohnDeere.com.

In conclusion, John Deere Limited supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada's critical infrastructure.

Sincerely,

Mike Blonski
President, John Deere Limited

cc. Canadian Common Ground Alliance
June 23, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A ON

Re: Support for CCGA Application for Shared Use of 811

Kinder Morgan Canada supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure—including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited NII resources.

Kinder Morgan Canada is a leader in the petroleum transportation industry and is committed to ensuring the safety of its pipelines and the protection of the environment and communities where it operates.

In conclusion, Kinder Morgan Canada supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Hugh Harden
VP Operations & Engineering

cc. Canadian Common Ground Alliance
July 4, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-Television and Telecommunications Commission
Ottawa, Ontario K1A ON

Re: Support for CCGA Application for Shared Use of 811

Ontario One Call supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

In conclusion, Ontario One Call supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Geoff FitzGibbon
Executive Director, Ontario One Call

cc. Canadian Common Ground Alliance
June 16, 2011

Mr. Robert A. Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario K1A 0N

Re: Support for CCGA Application for Shared Use of 811

Saint John One Call supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Saint John One Call currently serves the City of Saint John, New Brunswick. We currently have 7 seven members on board whom are The City of Saint John, Saint John Energy, Bell/Aliant/Enbridge Gas NB, Brunswick Pipeline, Maritime Northeast Pipelines and Irving Oil. This group started talking in March 2001 and formed the official Saint John One Call in the summer of 2001. We feel the group has come a long way by sharing the awareness of underground infrastructure and public awareness, but there is always the need for more awareness.

In conclusion, Saint John One Call supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

Darin Lamont
Chairman Saint John One Call

cc. Canadian Common Ground Alliance
May 9, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A 0N0

Dear Mr. Morin:

Re: Support for CCGA Application for Shared Use of 811

Sask 1st Call supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure - including hospitals, energy, telecommunications, air traffic control, banking, and emergency response - constitute valuable strategic assets benefiting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Sask 1st Call is a “Call Before You Dig” location screening and notification service for Saskatchewan contractors and customers who are planning to dig or excavate, processing over 106,000 locate requests in 2010. Calling Sask 1st Call proactively alerts our 37 member companies of plans to disturb the ground to ensure that underground facilities are clearly marked before work starts. First Call/One Call organizations enhance safety to the public and digging community as well as reduce damage and associated costs to underground facilities.
In conclusion, Sask 1st Call supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada's critical infrastructure.

Sincerely,

Cheryl J. Elmer
Manager, Sask 1st Call

cc. Canadian Common Ground Alliance
June 29, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario K1A ON

Re: Support for CCGA Application for Shared Use of 811

Westcoast Energy Inc., doing business as Spectra Energy Transmission ("Spectra Energy"), supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking, and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada’s limited N11 resources.

Spectra Energy Corp, a FORTUNE 500 company, is one of North America’s premier natural gas infrastructure companies serving three key links in the natural gas value chain: gathering and processing, transmission and storage, and distribution. BC Pipeline and BC Field Services Divisions operate within Spectra Energy Transmission West. Together, these businesses operate approximately 5,700 kilometres (3,540 miles) of natural gas gathering and transmission pipelines and five major gas processing plants. This integrated system has a processing capacity of approximately 2.0 bcf per day and transportation capacity of 2.2 bcf per day - connecting diverse gas supply regions in northeastern British Columbia, Alberta, the Yukon and southern Northwest Territories with growing markets in BC, the US Pacific Northwest and other markets in the US and Canada.
In conclusion, Spectra Energy supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada’s critical infrastructure.

Sincerely,

[Signature]

for
Gary Metz
Manager, Lands

cc. Canadian Common Ground Alliance
June 28, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-Television and Telecommunications Commission  
Ottawa, Ontario  K1A 0N

Dear Mr. Morin,

Re: Support for CCGA Application for Shared Use of 811

TransCanada supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and Call Before You Dig.

Canada’s critical infrastructure—including hospitals, energy, telecommunications, air traffic control, banking, and emergency response—constitute valuable strategic assets benefitting all Canadians. Much of Canada’s critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada’s critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada’s critical underground infrastructure is excavation by homeowners and commercial excavators. Currently there are multiple ten-digit telephone numbers that must be called in order to determine the location of underground infrastructure. The result is public confusion, lack of awareness, and thus increased disruption of essential public services.

The solution is one nationwide three-digit telephone number for Call Before You Dig in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. We agree that shared use of 811 is the ideal choice. It will enable easier access to provincial One Call centers and result in greater public benefit from Canada’s limited NII resources.

Continued on page 2
With more than 60 years experience, TransCanada is a leader in the responsible development and reliable operation of North American energy infrastructure including natural gas and oil pipelines, power generation and gas storage facilities. TransCanada's network of wholly owned natural gas pipelines extends more than 57,000 kilometers (35,500 miles), tapping into virtually all major gas supply basins in North America. TransCanada is one of the continent's largest providers of gas storage and related services with approximately 380 billion cubic feet of storage capacity. A growing independent power producer, TransCanada owns, or has interests in, over 10,800 megawatts of power generation in Canada and the United States. TransCanada is developing one of North America's largest oil delivery systems. TransCanada's common shares trade on the Toronto and New York stock exchanges under the symbol TRP.

In conclusion, TransCanada supports the CCGA application for shared use of 811 in Canada. We strongly believe that achieving this goal will significantly enhance public awareness, increase public safety, and ultimately help protect Canada's critical infrastructure.

Sincerely,

James (Jim) Baggs
Vice-President, Operations and Engineering

Dean Cowling
Vice-President, Community, Safety and Environment

cc: Canadian Common Ground Alliance
June 23, 2011

Mr. Robert A. Morin  
Secretary General  
Canadian Radio-television and Telecommunications Commission  
Ottawa, Ontario  
K1AON2

Dear Mr. Morin:

**Re: Support for CCGA Application for Shared Use of 811**

Union Gas strongly supports the Canadian Common Ground Alliance (CCGA) application to the Canadian Radio-television and Telecommunications Commission (CRTC) for shared use of 811 in Canada for public access to both non-emergency medical services and *Call Before You Dig.*

Canada's critical infrastructure – including hospitals, energy, telecommunications, air traffic control, banking and emergency response – constitute valuable strategic assets benefitting all Canadians. Much of Canada's critical energy and telecommunications infrastructure is underground, supporting public safety, national security, and sustaining the Canadian economy. It is in the national interest of all Canadians to protect and maintain the integrity and reliability of Canada's critical underground infrastructure. Furthermore, it is their expectation that all reasonable measures be taken to do so.

The greatest risk to Canada's critical underground infrastructure is digging by homeowners and commercial excavators who do not first obtain the location of underground utilities. Currently in Ontario there are up to thirteen ten-digit telephone numbers that must be called in order to determine the location of all utility lines in the vicinity of a dig site. This experience is similar across Canada. Homeowners do not know whom to call and excavators may take short cuts. The result of this complex and onerous approach is public confusion, lack of awareness, and thus increased disruption of essential public services.

We believe that the solution is one nationwide three-digit telephone number for *Call Before You Dig* in Canada, as proposed in the CCGA application to the CRTC. Replacing the multiple ten-digit telephone numbers with one nationwide three-digit number will eliminate confusion. It will enable easier access to provincial One Call centres and result in greater public benefit from Canada's limited NII resources.
Union Gas serves over 1.3 million customers in more than 400 communities across Ontario. Almost 45 percent of incidents involving damage to our pipelines each year are related to third parties digging without first obtaining the location of underground utilities. Last year, this resulted in 1,267 line breaks in our service area alone. In addition to the risk of a serious public emergency as well as the inconvenience of utility outages, damages caused by excavators who do not obtain the location of utility lines in advance cost Ontario taxpayers about $33 million a year.

In conclusion, Union Gas supports the CCGA application for shared use of 811 in Canada. Please do not hesitate to contact me if I may answer any questions you may have on this matter.

Sincerely,

Julie Dill

cc. Canadian Common Ground Alliance