

# Independent Review of E-Comm Emergency Communications for British Columbia Incorporated

*September 2025*



Shape the future  
with confidence

# Table of contents

<b>EXECUTIVE SUMMARY .....</b>	<b>1</b>
<b>INTRODUCTION.....</b>	<b>8</b>
<b>FINDINGS AND RECOMMENDATIONS .....</b>	<b>22</b>
<b>PRIORITIZATION AND IMPLEMENTATION .....</b>	<b>67</b>
<b>CONCLUSION .....</b>	<b>71</b>
<b>APPENDICES .....</b>	<b>72</b>

*Disclaimer: This report was prepared for the Government of British Columbia and is advisory in nature. It does not constitute an audit, financial or otherwise, under the standards of the Chartered Professional Accountants of Canada or any other body. It was not intended for, and should not be used by, any other parties.*

# Executive summary

Emergency Communications for British Columbia Incorporated (“E-Comm”) was created as a radio network and service provider in the late 1990s to help emergency services providers in the BC Lower Mainland better communicate and coordinate during emergency incidents. The organization has since expanded its communication operations to serve police and fire agencies throughout the province, becoming a much more complex organization.

E-Comm has an active headcount of 754 as of June 2025 and a 2025 annual expense budget of \$153 million. It continues to deliver both a radio network business line and an emergency communications operations business line. As a part of the emergency communications operations business line, E-Comm provides primary and secondary Public Safety Answering Point (PSAP) services, as well as dispatch services to its clients.

Use of E-Comm services is voluntary; local governments are responsible for emergency communication services and can select whether to provide services themselves, outsource to E-Comm, outsource to RCMP Operational Communications Center (OCC) in applicable regions, or another service provider. E-Comm currently provides primary PSAP 911 call-answer services to 25 of the 27 regional districts in the province. It operates two call-centers, one located in the Lower Mainland (Vancouver), and the other located on the South Island (Victoria). E-Comm currently is responsible for answering 99% of 911 calls (primary PSAP services) in the province.

The Province of BC engaged EY to conduct an independent review of E-Comm, as it is a key component of maintaining public safety and end-to-end emergency response services. This review aims to identify the key challenges E-Comm faces, uncover the root cause(s), and provide actionable recommendations to promote financial sustainability and transparency, service quality and resilience across the 911 emergency communications system, and achieve positive public safety outcomes – especially relevant considering the increasing frequency of extreme weather events such as heat domes and atmospheric rivers.

The scope was delivered through two separate reports. The first report is a review of E-Comm as an organization (this report), focusing on:

- **Governance:** Assessing the effectiveness of E-Comm’s strategic management and Board governance.
- **Finance:** Evaluating the financial processes, health, and sustainability of the organization.
- **Operations:** Analyzing operational efficiency, effectiveness, and resilience.

The second report (“Emergency Communications Service Delivery Model in BC”) addresses the following:

- **Service delivery model:** Assessing the future of 911 service delivery in BC, including governance, standards and regulations, funding, and capacity.
- **Policy and recommendations:** Identifying potential regulatory framework changes required to support the future role of the Province in this sector.

E-Comm plays a significant and integral role in enabling the provision of public safety in the province. The organization has initiated several measures to improve service levels in the past three years, including the introduction of a non-emergency police call-taker role, the consolidation of a provincial 911 call queue between the Lower Mainland and Vancouver Island, the establishment of a data and analytics team to enhance demand forecasting capability, and comprehensive training and upskilling programs. As a result of these efforts, service levels have shown improvement. In addition, E-Comm has taken a lead role in the rollout of *Next Generation 911*, and compared to other jurisdictions, is generally considered ahead of the curve for this implementation nationally.

The findings and recommendations within this report highlight key challenges within governance, finance and operations. It is important to note that the findings within the operations workstream are smaller in nature and 911 services continue to provide essential services to the public every day. E-Comm has grown significantly and quickly since its inception. The risks highlighted within this report focus on optimizing efficiency, enhancing impacts to public safety, and building the resilience of the organization (both from a business continuity perspective but also from a governance and financial sustainability perspective).

## Governance

E-Comm was established primarily to provide an emergency wide-area radio network for the Lower Mainland; its governance structure and Board were designed to support this objective at that time. However, the organization has since expanded its operations and become a much more complex organization. Both the Province and E-Comm identified that the existing governance structure no longer adequately addresses the current needs of the organization. As such, the governance structure has been a focus area for E-Comm in recent years.

### Key governance findings

Two of the most fundamental challenges facing E-Comm are related to governance. These two challenges are root causes to several of the other findings identified within this report and should be addressed with priority.

#### Board governance

The current Board size, structure and composition were defined for a radio technology organization and do not support effective governance of an increasingly complex organization with a broad province-wide service delivery focus.

This misalignment results in diminished strategic decision-making, loss of institutional memory due to high turnover of Directors as many revolve off in political cycles, ineffective discussions, and challenges in maintaining accountability, ultimately compromising the effectiveness of E-Comm's governance and service delivery.

This report recommends optimizing the size of the Board to 8-12 members down from 25, requiring that members be independent, ensuring an appropriate mix of skills in the Board's composition, and an update to its Terms of Reference to include a policy on tenure.

#### Provincial role

Perhaps more fundamental than board governance is the role that the province plays in the management and delivery of PSAP services in the province.

The province has no defined role in overseeing emergency communication services and there is currently no appropriate policy framework, including adequate legislation, to enhance that role.

Although several provincial statutes, such as the *Emergency Communications Corporation Act* (ECC Act), and *Police Act*, grant legal authority for different aspects of emergency communication, they do not create a unified framework for PSAP service delivery. While the Province holds overarching accountability for public safety, it does not have a formally defined legislated role in the governance, oversight, or operations of PSAP services. Oversight by the provincial government is limited to the specific functions covered under each statute or agreement, and there is no overarching mechanism to coordinate or standardize governance, operational practices, or performance requirements of provincial emergency communications.

The absence of a Provincial decision on its role means there is no reference point for measuring intended outcomes or accountability for results. This has contributed to pervasive challenges felt across the

emergency communications sector including unclear roles and responsibilities, operational challenges due to inconsistent standards, fragmented governance, limited collaboration or coordination among key actors, and limited long-term planning capability.

This report recommends that the Province clearly define its role within emergency communications and align legislative mechanisms to support effective governance, performance management, and the ability to influence impacts to public safety.

**Other governance related findings include:**

- Stakeholder trust with members and clients is eroding, exacerbated by rising costs and unclear forecasting. A new comprehensive stakeholder framework that is both complementary to, and aligned with, the new governance model is recommended.
- Operational realities including the COVID-19 pandemic and historical challenges meeting service targets have required the Executive Leadership Team (ELT) to focus on operational issues rather than strategic planning and prioritization. The Board should consider a shift to developing a three-year rolling strategic plan, while ELT should refocus on strategic priorities and critical challenges.
- The organization does not have an updated strategic plan or an organizational performance scorecard. This report recommends developing a structured Corporate Performance Measurement Framework aligned to strategic planning objectives to support regular and timely updates against plan as well as ongoing organizational reporting to enhance accountability.

## Finance

Financial management and sustainability continue to be a focus for E-Comm, dominating strategic planning and Board meetings due to concerns over the growth in levies over the past five years, the appropriateness of the allocation of costs to clients, and the lack of predictability, transparency, and consistency to levies each year. These concerns are well-known and consistent themes throughout the review, and E-Comm has been developing a new financial model to more accurately assign and track costs using real cost drivers to inform customers of levies. The proposed new financial model starts to address some of these challenges.

### Key finance findings

The Finance section of this report explores aspects of E-Comm's financial structure in conjunction with some of the challenges raised in the Governance section. It discusses key financial management themes, including budgeting, expense management, cost allocation, revenues, capital funding, and financial risk mitigation using contingencies.

#### Budgeting

E-Comm's budgeting processes reveal shortcomings, including limited accountability and alignment between a dated strategic plan and the current budget. Furthermore, there is a need for greater transparency in the budgeting process, particularly regarding budget completion timelines and levy calculations, to better meet the expectations of funding agencies.

With little connection to a strategic plan and long-range forecasts, the Board is not enabled to challenge, debate, and make informed decisions on where investments should be made. Budget information provided to the Board is high-level and focuses on cost impacts to levies, rather than a complete organizational budget. Additionally, local governments lack the ability to accurately budget and plan for E-Comm levy increases as there is limited understanding of the drivers of those increases, resulting in potential financial strain and difficulty obtaining budget approval.

This report recommends embedding strategic priorities in budget development and a more formal review and approval process utilizing the Board and its finance committee for key decisions. Levy communications should be a critical component of the stakeholder management framework and must be better aligned to municipal budgeting cycles and timelines.

## Expense management

This report also notes a Compound Annual Growth Rate (CAGR) of 14.3% from 2020 to 2024 in expenses for the last three consecutive years. This has been strongly influenced by personnel costs, as salaries and benefits accounted for an increasing share of total expenses, rising from 71% in 2020 to 74% in 2024, with a CAGR of 15.6% over this period.

Expense management accountability has been a struggle for E-Comm, with limited budget-to-actual reporting. In addition, E-Comm has not been effective in communicating the link between strategic initiatives, increasing expenses, and the impact on levies to local governments to either the Board or its clients.

Historically, there has been limited focus on reporting expenses against budget in E-Comm's financial management approach, which prevents strategic spending oversight by the Board and limited accountability to local governments. This report recommends enhancing expense management practices to include ongoing expense tracking, budget variances and forecasts through the development of a financial reporting dashboard, decision making framework to outline the process for strategic initiative prioritization, and regular reporting to the Board. This will also allow for greater transparency and communication between E-Comm and its clients on the link between expenditure growth, on-going organizational transformations (e.g., NG911 implementation) and levy increases.

## Corporate cost allocation and impact on levies

E-Comm's Corporate Cost Allocation Model is important, as a considerable amount of the levies charged to funding agencies are comprised of corporate costs in addition to the direct operational costs incurred in delivering the services. If the costing methodology does not reflect a reasonable rate of consumption of corporate costs, then the levies charged to funding agencies may be inconsistent.

Corporate expenses are not allocated in a manner that reflects the drivers or consumption of those costs resulting in inequitable distribution of costs across funding agencies.

Corporate costs are allocated to radio or operations business lines so that they can be recovered through levies. This is done using a methodology that is highly manual and reflects an outdated view of E-Comm's corporate cost split between Radio and Operations dating back to 2010. This report recommends improving the accuracy of cost allocations by incorporating additional, more specific allocation drivers tailored to each part of E-Comm's business lines. While E-Comm has been developing a new financial model that aims to improve corporate cost allocation, this report recommends going a step further in the new model by aligning corporate costs directly to service delivery and including better stakeholder reporting to enhance financial accountability and transparency.

There is limited traceability of costs for both levy calculations and identifying the cost to deliver different services or levels to clients. This is partially due to E-Comm's use of a historical allocation basis for charging funding agencies levies.

E-Comm does not have the ability to price differing service levels or services provided to clients based on the way costs are recorded and allocated.

The new financial model attempts to align costs at a more granular level and provides a clear and defensible basis for allocating costs into levies for each funding agency. However, it does not consider service levels in its calculations or allocations. This report recommends E-Comm should consider implementing pricing strategies in combination with standardizing service definitions, which could include establishing a single standardized level of service for all clients.

**Other finance related findings include:**

- E-Comm's five-year forecasts and levy outlooks are not comprehensive nor reliable. The organization is already in progress of enhancing this process and presenting the five-year forecast in combination with the detailed one-year budget, allowing E-Comm and its clients to have greater predictability on spend.
- E-Comm does not have an operational contingency fund to address unexpected and unforeseeable expenses. Establishing a contingency or stabilization reserve with appropriate controls can help to smooth unexpected expenses and impacts on levies during significant, unanticipated events.
- E-Comm can experience significant budget variances year-to-year and do not have a documented policy on how to manage them. Developing a policy will help create greater transparency and mitigate financial risk for them and the local governments that fund them.
- Managing capital funding is challenging for E-Comm, and highlights vulnerabilities in financial sustainability due to the absence of a capital asset fund. E-Comm should consider creating a capital reserve fund (to be funded through levies) specifically to support adequate funding for capital projects and enhance financial planning and sustainability.

## Operations

E-Comm must remain responsive to uncertainty posed by the external environment. Significant events which have recently impacted E-Comm's operations include staffing issues exacerbated by COVID-19, call surges due to the Lower Mainland and South Island heat dome, the 2021 atmospheric river event, Android cell phone technological issues, and the worsening toxic drug crisis. As a result, call takers and dispatchers faced significant pressure, leading to increased overtime and higher stress levels.

## Key operations findings

The operations stream evaluated the efficiency and effectiveness of E-Comm's operational performance, with consideration to the challenges faced in the external environment. It focused on service levels, operational resilience, culture and workforce, and contracting practices.

### Service metrics

E-Comm's clients recognized that service levels have improved in the past two years. Performance is reported to clients monthly through reports and dashboards that include several call-answering metrics.

While service level performance and reporting have significantly improved, there is currently no defined performance benchmark, so reporting is limited to historical comparisons.

The inability to assess true performance due to unclear reference points and the absence of quality measurement undermines E-Comm's accountability to stakeholders. This report recommends developing a benchmarking framework that incorporates industry standards, leading practices from other jurisdictions and client expectations for key metrics. Service quality metrics should be used for continuous improvement in call-taking and dispatch services, including non-emergency calls.

## Contracting practices

E-Comm manages 76 separate agreements for services, from 911 call-taking to dispatch; each agreement differs as standardized terms have not been defined. Contracting at E-Comm is inconsistent, with a lack of adequate account management resources and mechanisms to effectively manage client relationships and support client concerns.

E-Comm is unable to establish a cost-per-service formula, and operational practices note an absence in service standardization resulting in variations in contracting practices. A significant number of clients operate without formal agreements or with expired contracts resulting in a significant risk to the organization and unclear roles and expectations between E-Comm and clients.

The absence of clear and standardized agreements results in confusion among clients regarding service scope and costs, difficulty for E-Comm management to deliver, measure and report against expectations, and potential errors in service delivery. This report recommends creating a standardized service catalogue with definitions of services offered by E-Comm that includes detailed descriptions each service and associated pricing structures. This should be reflected in formal standardized agreements with all operational clients to clearly outline the scope of services provided.

## Operational resilience

A consistent theme observed by clients and Board members relate to concerns about E-Comm's capability and capacity to effectively handle system outages or emergencies due to a low redundancy level, insufficient business continuity capabilities and the risks tied to a consolidated service provider that may lead to high impact failures.

E-Comm's current resilience framework reveals several strengths, such as backup power systems and cross-trained staff, but also significant gaps, including the absence of formal Business Continuity Plans (BCPs), insufficiently tested inter-agency call-routing, and limited integration with province-wide emergency communications.

The absence of a robust and comprehensive resilience framework compromises E-Comm's ability to effectively respond to emergencies and maintain service continuity, increasing the risk of operational disruptions and undermining public safety and stakeholder confidence in the organization's preparedness. This report outlines a series of recommendations to support E-Comm's continued progress in building its resilience capability, including:

- Continuing to enhance resilience by addressing gaps identified in the resilience framework assessment.
- Integrating longer term redundancy capacity building initiatives into capital planning processes; and
- Establishing partnerships with other organizations' continuity plans to strengthen cross-agency operational alignment and failover, and to improve emergency response coordination.

### Other operations related findings include:

- The rationale behind current service level targets is unclear and not well documented which could potentially cause misaligned expectations between E-Comm and its clients. E-Comm and the Province should consider reassessing current service level targets to determine if they appropriately balance client needs, cost-effectiveness and alignment with industry standards.
- A strong approach to workforce planning helps align human resources with organizational goals and positions the right talent to meet both current and future demands. With the transition to NG911, E-

Comm must account for evolving skill requirements, increased technology integration, and new ways to interact with the public.

- In technology, E-Comm has focused over the past years on cloud strategies aimed at transitioning workloads to cloud platforms to enhance operational resilience, investments in cybersecurity, and the implementation of NG911. This report outlines a series of leading practices for E-Comm to consider optimizing its use of technology in delivering its services.

## Prioritization and next steps

This report outlines **17 findings and 26 targeted recommendations** that address the issues or opportunities identified across three workstreams - governance, finance, and operations - and provide an actionable path forward.

To guide sequencing and decision-making for implementation, each recommendation was assessed against impact and complexity. The prioritization matrix is intended as directional guidance for planning purposes. Implementation decisions should be confirmed through detailed planning and may be adjusted as resources, priorities, and operational needs evolve.

In summary, there are three recommendations that are considered foundational to the success of the organization as well as the ability to successfully implement several other recommendations. Secondary to these, are several high impact recommendations which should be prioritized above the others. The highest impact recommendations will also require the greatest amount of effort and consideration in implementation, but they should not be ignored due to their complexity.

<p><b>Foundational recommendations</b> <i>(key to the ongoing success of the organization)</i></p>	<ul style="list-style-type: none"> <li>▪ Optimize E-Comm’s Board size to 8-12 independent members with an appropriate mix of skills.</li> <li>▪ Clearly define the Province’s role within emergency communications and align legislative mechanisms to support clarity in roles and responsibilities.</li> <li>▪ Define a comprehensive stakeholder management framework aligned to the governance model which reflects both governance-level and operational relationships.</li> </ul>
<p><b>High impact recommendations</b> <i>(Will have a significant impact on the organization and its stakeholders)</i></p>	<ul style="list-style-type: none"> <li>▪ Shift strategic planning to a three-year plan to enable greater responsiveness to key issues.</li> <li>▪ Refocus the ELT on strategic priorities.</li> <li>▪ Develop a corporate performance management framework aligned to strategic planning to support accountability.</li> <li>▪ Incorporate strategic priorities within budget setting.</li> <li>▪ Annually present a full organizational budget to the Board for approval.</li> <li>▪ Create a standardized service catalogue with definitions of services offered and associated pricing structures.</li> <li>▪ Implement pricing strategies to support alignment between services provided and costs to deliver.</li> </ul>

# Introduction

E-Comm Emergency Communications for British Columbia Incorporated (“E-Comm”) is facing a number of complex challenges. It has been mandated to adopt “Next Generation 911 (NG911) technology by the Canadian Radio-television and Telecommunications Commission (CRTC), it needs to adapt its services to increasing climate threats such as heat domes, and atmospheric rivers, while at the same time responding to stakeholder concerns about service levels and escalating costs. This situation has resulted in the decision by the Province to undertake a broad independent review to identify key challenges and opportunities to improve E-Comm’s role in maintaining public safety and end-to-end emergency communications services. The British Columbia Provincial Government (“the Province”) is at a critical juncture in its role, in partnership with first responder agencies and local governments, to maintain and support public safety through reliable access to emergency communication services.

This review provides an understanding of the key challenges, their root causes, and recommendations for how to move forward with realistic and actionable steps that will better support public safety in British Columbia.

E-Comm plays a significant role in supporting public safety through:

- the maintenance of the largest multi-jurisdictional radio network in the province (used by Police, Fire, Ambulance, TransLink, and municipal emergency management teams to communicate essential messaging),
- 911 call-answer (primary and secondary Public Safety Answering Point [PSAP] services), and
- police and fire dispatch services.

The current governance and funding models are based on local government participation and cost-recovery levies to fund the organization’s ongoing operations. While E-Comm delivers emergency communication services, public safety remains the responsibility of the Province, local governments, and emergency service providers such as police, fire, and ambulance.

## Scope and approach

The scope was delivered through two separate reports. The first report is a review of E-Comm as an organization (this report), focusing on three workstreams:

- **Governance:** Assessing the effectiveness of E-Comm’s strategic management and Board governance.
- **Finance:** Evaluating the financial processes, health, and sustainability of the organization.
- **Operations:** Analyzing operational efficiency, effectiveness, and resilience.

The second report (“Emergency Communications Service Delivery Model in BC”) addresses the following:

- **Service delivery model:** Assessing the future of 911 service delivery in BC, including governance, standards and regulations, funding, and capacity.
- **Policy and recommendations:** Identifying regulatory framework changes required to support the future role of the Province in this sector.

Each of the workstreams followed similar steps in execution but focused on distinct areas outlined in review frameworks co-designed with the Province and EY. Through current state analysis and gap analysis, the workstreams integrate in delivery while leveraging distinct subject matter expertise.

The specific E-Comm services that are in scope for this review include:

- Primary Public Safety Answering Point (PSAP) for 911 services
- Secondary Public Safety Answering Point dispatch services
- Non-emergency call answer services
- Post-disaster and operational facilities
- The financial, operational, and governance impact of NG911 on E-Comm
- E-Comm's radio services business line impacting on funding and costs, service provision, and governance

Out of scope services included NG911 technical migration and the radio services business line. However, governance of the entire organization is evaluated, which incorporates consideration to these out-of-scope areas.

The approach to this review included interviews, documentation review, consultations with subject matter resources, jurisdictional scan, site visits, and attendance at Board meetings, as outlined below:

- **Interviews** were conducted to understand current service delivery ecosystem, identify areas of concern, and explore opportunity areas for improvement. Over 100 individuals were engaged as a part of this review. A complete list of participants can be found in Appendix B.
- **Documentation review** was completed to substantiate and identify current state, ongoing plans and opportunities for improvement. The review of documentation informed follow up inquiries, enhanced our understanding current and ongoing initiatives, and further substantiated challenges and opportunities identified in interviews.
- **Consultations with subject matter resources** were leveraged to identify leading practices and provide a point of comparison for E-Comm's current state. These consultations also supported the identification of root causes to support development of impactful and realistic recommendations.
- **Jurisdictional scan** research was completed to enable comparative analysis of PSAPs in other regions. This scan examined regulatory frameworks, corporate structure, funding models, and operational performance and efficiencies in Canadian and international comparators. The complete jurisdictional scan can be found in Appendix C.
- **Site visits** to E-Comm's two emergency communication centres located in BC's Lower Mainland (ECLMD) and Vancouver Island (ECVI) occurred to observe current operational processes and solicit feedback from operational staff to identify areas of concern and validate the information provided.
- **Board meetings** were attended in April and June of 2025 to observe Board operations and governance processes such as decision making, discussion and challenge, strategic direction setting, and risk management.

## How to read this report

The **background and context** section provides a comprehensive overview of E-Comm, its environment, and high-level practices to ensure a foundational knowledge required to understand the findings and analysis.

Findings are organized into thematic areas within each of the three key workstreams: governance, finance, and operations. Each thematic area provides relevant context and observations, leading to a finding statement, a description of the impact, and correlated recommendations.

The recommendations are listed and prioritized to prepare for implementation in the final section.

# Background and context

Emergency communications in British Columbia (BC) is a multifaceted network comprised of primary Public Safety Answering Points (PSAPs), which are the initial contact for emergency calls, and secondary PSAPs that handle specialized responses. Dispatch centers serve as operational hubs, coordinating resources and communication between PSAPs and first responders. Additionally, radio communication plays a crucial role in facilitating real-time interactions among emergency personnel. The system also leverages advanced technologies, such as Geographic Information Systems (GIS), to enhance situational awareness and support multi-agency collaboration during large-scale incidents.

Several key actors surround the emergency communications sector forming a broader ecosystem of emergency services. The figure below outlines some of these key actors.

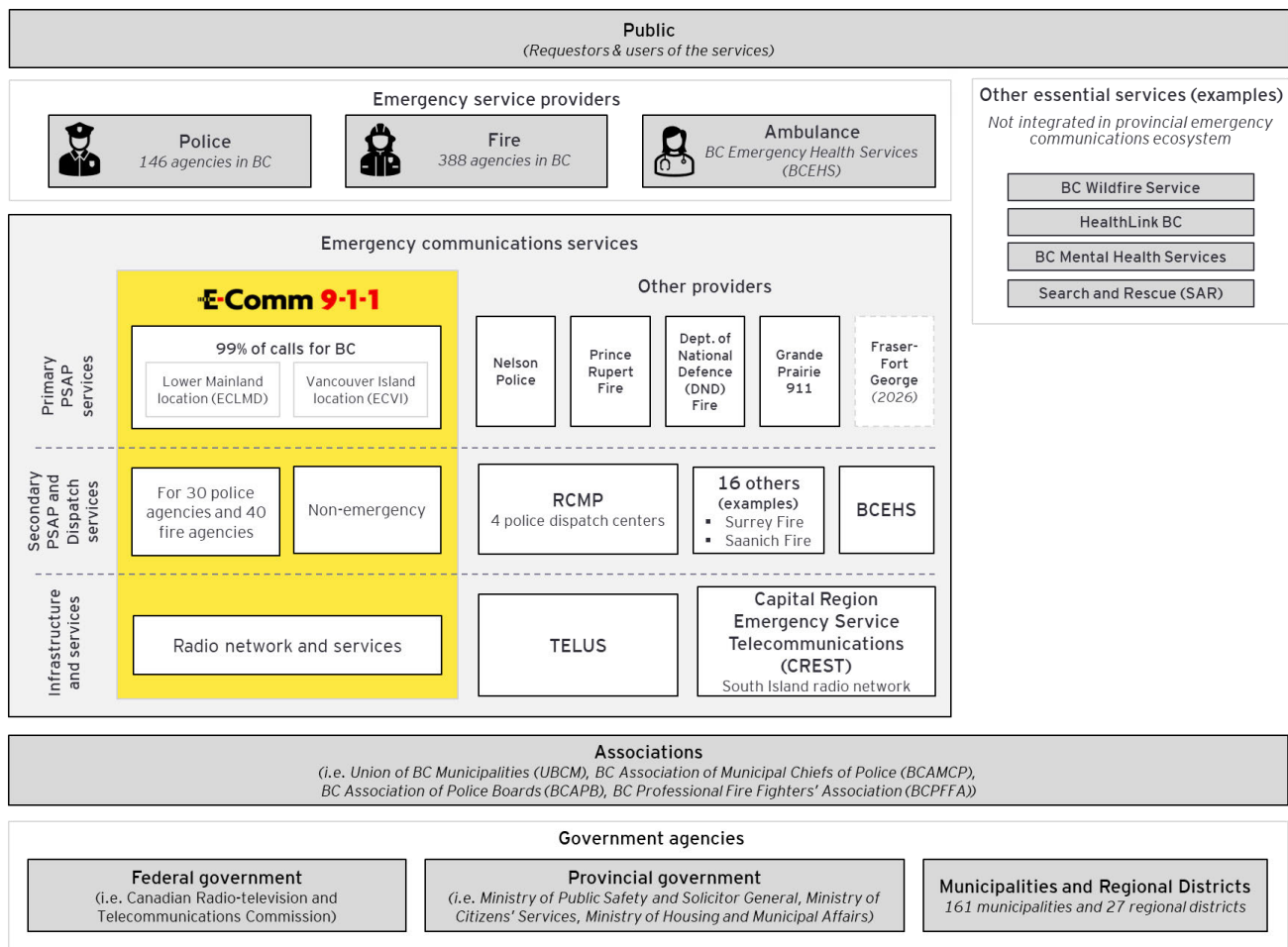


Figure 1: Emergency communications ecosystem in BC

E-Comm was created in the late 1990s to help emergency services providers in the BC Lower Mainland to communicate and coordinate better during emergency incidents as a radio network and service provider. The trigger event that defined the need for E-Comm was the 1994 Stanley Cup riots in downtown Vancouver, when police, fire and ambulance services converged on the area with no ability to speak to each other over their different radio systems. Initially, the organization had three core mandates:

1. Operate as an integrated, regional radio system used by police, fire, and ambulance agencies throughout the Lower Mainland.

2. Provide police communication operations (PCO) and fire communication operations (FCO) services for several Lower Mainland police and fire departments.
3. Serve as the regional 911 PSAP for Metro Vancouver Regional District.

## Legislation and legal structure

E-Comm was established under the *Company Act*, later replaced by the *Business Corporations Act (British Columbia)* and designated as an 'emergency communications corporation' under the *Emergency Communications Corporations Act (British Columbia)* (ECC Act, or "the Act"). Radio technology services include maintenance of 45 radio equipment towers and over 15,000 mobile radio devices for emergency responders and municipal service staff across the Lower Mainland, who make more than 50 million transmissions annually.

In the 1970s, local call centers known as PSAPs were established by local governments to receive 911 calls within each region. Telecommunications companies automatically routed each 911 call via dedicated telephone lines to the nearest PSAP which were then responsible for directing each call to appropriate police, fire, or ambulance for dispatch. Over time, smaller PSAPs were consolidated into larger, regional centers for efficiency. Now, in addition to radio communication services, E-Comm provides primary PSAP 911 call-answer services to 25 of the 27 regional districts in the province, secondary PSAP and dispatch services for 70 police and fire agencies, and non-emergency services.

E-Comm is structured as a cost-recovery, not-for-profit organization and tax exempt by the Canada Revenue Agency (CRA). It recovers costs through the users of its services, which now includes radio operations, and emergency communications (including 911 call answer and dispatch services). Cost recovery for radio service members is mandated in the ECC Act s.7<sup>1</sup>; cost recovery for non-members is not mandated.

E-Comm has a Members' Agreement with its shareholder radio users, who are bound by its terms and conditions. For the RCMP, a Special User Agreement outlines specific terms. Under the ECC Act, the Ministry of Public Safety and Solicitor General (PSSG) must approve any amendments to the Members' Agreement.

The Members' Agreement outlines the structure of the Board of Directors and classes of memberships, responsibilities of the Board, the appointment of the President, approval of budgets, establishment of rates charged to members and special users, and oversight of long-term capital requirements and borrowing. Shareholder approval, obtained through shareholder votes, is necessary for key actions such as the dissolution of the company, amendments to its purposes, cost-sharing formulas, and borrowing beyond authorized budgets, as well as for significant changes impacting governance or financial stability.

## Provincial oversight

The Ministry of Public Safety and Solicitor General (PSSG) is responsible for the ECC Act, which is the statute that designates E-Comm as an emergency communications corporation. While the Act provides certain authorities of the Province with respect to designated emergency communications corporations, there are no mechanisms set out therein for Provincial oversight. Through the Members' Agreement, the Province has the right to designate two seats on the Board of Directors, with one held by the BC Fire Commissioner and the other currently held by an Assistant Deputy Minister from the Ministry of Citizens' Services (CITZ). Oversight is primarily exercised through participation in Board discussion, review of Board materials, and relationships with the executive team. Without formal legislation or regulation, provincial oversight of E-Comm remains limited and reactionary.

---

<sup>1</sup> In accordance with the ECC Act, s.7, members of an emergency communications corporation must pay to the corporation all rates for operating expenses and capital expenditures that are assessed by the corporation.

Without formal legislation or regulation, provincial oversight of E-Comm remains limited and informal. The statutory responsibility of 911 call answering, its associated costs, and applicable standards remain a responsibility of municipalities and regional districts. Under the *Police Act*, the Province is responsible for providing policing and law enforcement services in rural areas or municipalities with populations of up to 5,000 persons. For municipalities with populations exceeding 5,000 persons, this responsibility is delegated to local governments. It is important to note that the *Police Act* defines roles only for policing and does not cover fire or ambulance services, which are not legislated under the *Police Act*. Ambulance services are operated by BC Emergency Health Services (BCEHS) under the authority of the Provincial Health Services Authority (PHSA). BCEHS is a member of E-Comm, and the relationship is governed under the Members' Agreement; however, no formal agreement has been made for the down-streaming of 911 calls.

## Board of Directors

The structure of the Board is outlined within, and governed by, the Members' Agreement, originally signed by shareholders in 1997 and updated to its current version (Fifth Restatement) effective in 2023. Amendments to the Members' Agreement and Articles must have approval of the Minister (ECC Act s. 4 and 5 (5)). It is important to note that although minor changes have been made to Board seats since 1997, no structural or significant changes have been made to the governance model since the original Agreement in 1997.

E-Comm's Board of Directors can consist of up to 25 members, with the current membership totaling 22 Directors with an additional vacant seat to be filled by the incoming BC Fire Commissioner. Among these, five are independent Directors, and the remaining 18 Directors are designated by stakeholder organizations, each of whom selects their representatives independently from E-Comm (either individually or as part of a designating group as set out in the Members' Agreement): the Province designates 2 Directors, the RCMP designates 1 Director, E-Comm shareholders designate 14 Directors, and one seat is filled by the Capital Regional District and South Vancouver Island Police Partner Agencies, an operational service client to support inclusive representation across the diverse jurisdictions E-Comm serves.

E-Comm has developed a skills matrix to identify the necessary skills and attributes for optimal Board composition incorporate evaluation of governance skills, industry skills, and consideration to demographic background to encourage diverse perspectives and representation on the Board. This matrix is communicated to shareholder appointing parties to guide the appointment process. However, the skills matrix has limited influence over the nomination process, except for the five independent Directors.

Directors are elected for one-year terms and re-elected each year, with no limit to the maximum number of terms may be served. Nominations occur prior to the Annual General Meeting, where candidates are presented for shareholder voting. The five independent Directors are designated by the existing appointed Directors, excluding those representing the Province.

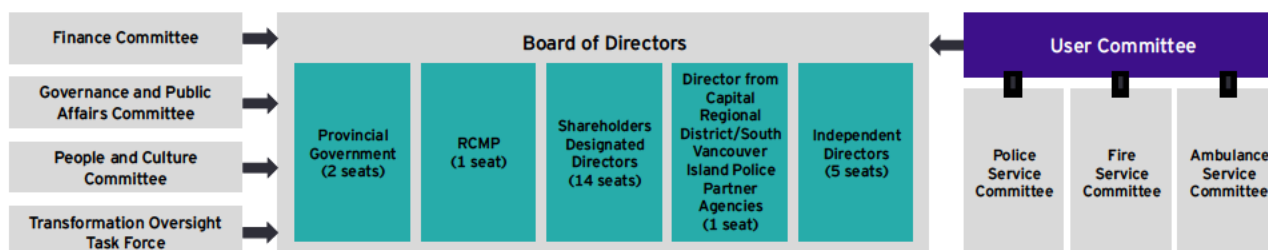
The Board composition is outlined below:

Designating party	Number of Directors designated
BC Emergency Health Services	1
City of Delta and Delta Police Board	1
Independent Police Boards (Abbotsford, New Westminister, Port Moody, Transit, West Vancouver)	1
Province of British Columbia (acting through the Ministry of Public Safety and Solicitor General)	2

RCMP	1
City of Richmond	1
City of Vancouver	1
Vancouver Police Board	1
Burnaby, Coquitlam, New Westminster, Port Coquitlam, Port Moody, Belcarra	2
Langley City, Langley Township, Surrey, White Rock	2
Lions Bay, North Vancouver City, North Vancouver District, West Vancouver	1
Maple Ridge, Pitt Meadows	1
Abbotsford	1
Metro Vancouver and TransLink	1
Capital Regional District and E-Comm’s South Vancouver Island Police Partner Agencies	1

**Table 1: Board composition by designating party**

The Board has three standing committees: Finance Committee (FC), People & Culture Committee (PCC), Governance and Public Affairs Committee (GPAC), and one task force: the Transformation Oversight Taskforce (TOTF).



**Figure 2: Current Board structure and committees**

As defined by the Terms of Reference, the functions of these standing committees and task force are as follows:

- **Finance Committee** supports the Board by reviewing and assessing financial information, internal controls, organizational risk, internal and external audit(s), financial policies, information technology risks and controls, and any other duties delegated to it by the Board of Directors.
- **People & Culture Committee** reviews, reports, and when appropriate, provides recommendations to the Board regarding human resources and compensation matters.
- **Governance and Public Affairs Committee** focuses on enhancing corporate governance by developing and implementing E-Comm’s corporate governance policies and practices and overseeing the effectiveness and performance of the Board of Directors (including overseeing communication with stakeholders).
- **Transformation Oversight Taskforce:** oversees the Transformation Plan’s initiatives, including improving operations and modernizing 911 services.

The Members’ Agreement also establishes a service committee for each Designated Company Service (radio for each of fire, police, ambulance and municipalities). TransLink is the sole Class A shareholder for municipal radio services; at this time, a Municipal Service Committee has not been established. Each member

or special user is granted the right to appoint a representative to the Service Committee corresponding to its shares. The User Committee is composed of chairs and vice-chairs from each of the Service Committees, and it serves to advise and counsel the President and CEO on operational policies, service delivery, and the needs of users. The User Committee is tasked with acting in the best interests of all representative services.

The User Committee provides reports at Board meetings highlighting key concerns but do not otherwise have a direct link to the Board and do not nominate Board members; note that service committees have no direct interaction with the Board.



Figure 3: User and service committee structure

## Stakeholder environment

It is important to understand the emergency communications stakeholder environment and how that impacts E-Comm, especially due to the organizational split between radio and operational services which permeates through organization structure, infrastructure, financial processes and governance. Key stakeholder groups in the broader ecosystem extends beyond those that E-Comm currently engages with.

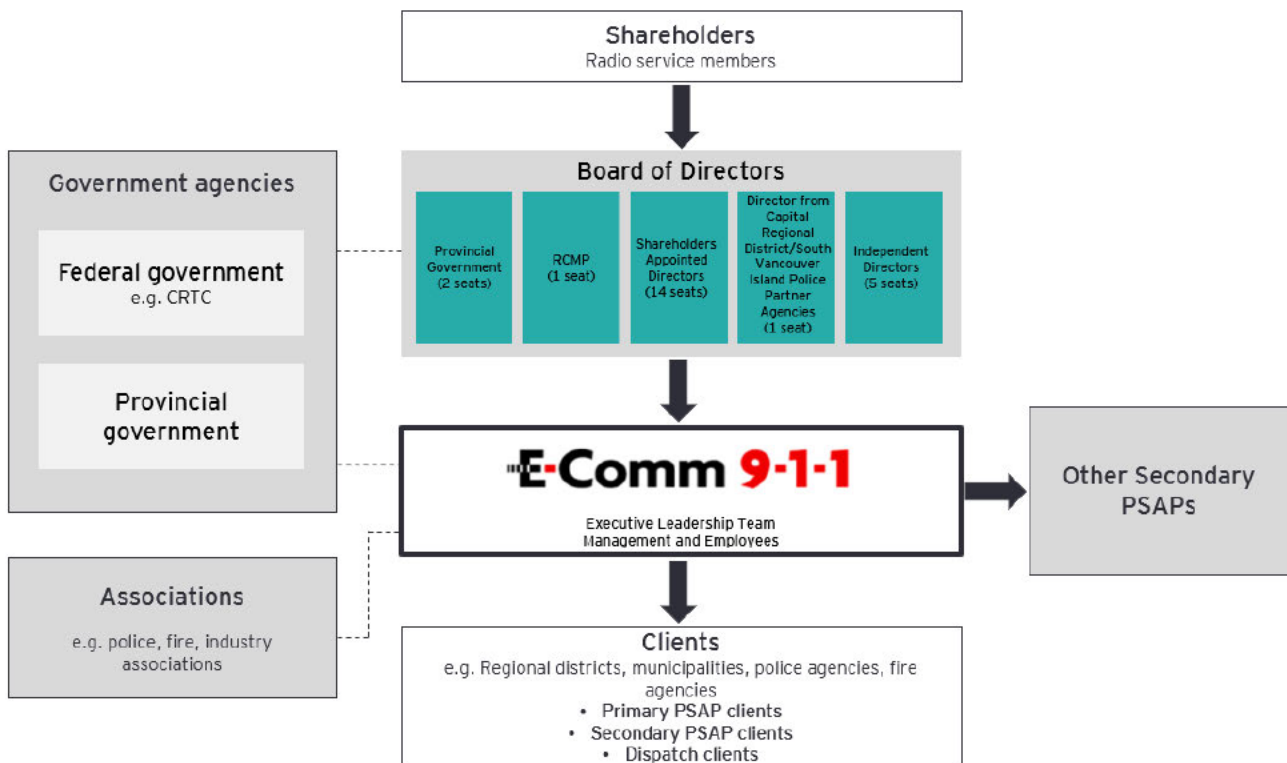


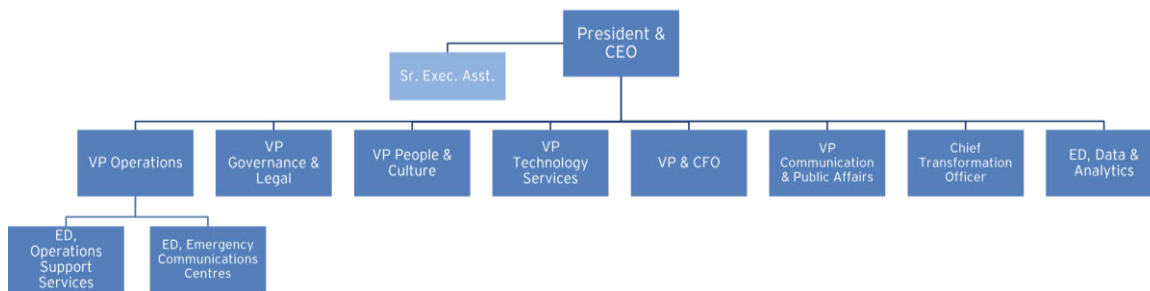
Figure 4: Stakeholder environment

- **Federal and provincial governments:** Government organizations can influence policy and operational direction, technology and organizational requirements, and the broader emergency communications environment. For example, implementing NG911 as mandated by the Canadian Radio-television and Telecommunications Commission (CRTC).
- **Shareholders:** Shareholders are classified as either Class A members (who have access to the radio network and voting privileges), or Class B members (who reserve the right to use the radio network

in the future through a right to convert their Class B share(s) into Class A share(s) and do not generally hold voting rights except as specifically required by the Members’ Agreement, Articles or applicable legislation). The Members’ Agreement includes a cost-sharing formula for these radio services.

- **Clients:** Clients for emergency communication operational services are generally governed by bilateral service agreements that outline their rights and obligations. Several operational committees are in place to engage with clients on operational and policy matters.
- **Associations:** Insights from police, fire or industry associations (e.g., British Columbia Professional Fire Fighters’ Association (BCPFFA), BC Association of Police Boards (BCAPB), etc.) can influence policies and practices related to emergency communications and response. E-Comm directly engages with these associations on an ad-hoc basis related to specific initiatives to discuss operational challenges, seek feedback, share leading practices, and explore opportunities for collaboration.
- **Other secondary PSAPs:** There are approximately 20 secondary PSAPs in BC in addition to E-Comm. As a primary PSAP, E-Comm is responsible for transferring calls to other secondary PSAPs, such as Surrey Fire, which do not utilize E-Comm’s fire call-taking and dispatch services. The relationship between E-Comm and downstream secondary PSAPs is important, as the speed, accuracy and coordination of emergency responses significantly impact the effectiveness of service delivery.

## Organizational structure



**Figure 5: Executive leadership team**

E-Comm’s internal structure includes an Executive Leadership Team (ELT) with 11 people. This team oversees the following functional areas:

- **Operations:** Manages two major emergency communications centers that provide 911 call taking as well as police and fire dispatch services and works alongside partner agencies and stakeholders to advance public safety initiatives.
- **Governance and legal:** Oversees all governance and legal affairs of the organization, encompassing legal services, Board operations, privacy and access compliance, and the development of enterprise policies.
- **People and culture:** Drives organizational success by attracting, retaining, and developing top talent while fostering a culture of inclusion and continuous growth. It enhances employee experience, ensures compliance with policies and labor laws, and builds a high-performing workforce aligned with E-Comm’s corporate values.
- **Technology services:** Manages and supports information and communication technologies that underpin 911 call-taking and dispatch operations. This includes overseeing critical infrastructure, cybersecurity measures, and the implementation of Next Generation 911 (NG911) technologies. It

also manages and maintains the wide area radio network, which account for about 17% of the workforce, serving as a critical resource for emergency communications among first responders across the Lower Mainland and part of the Fraser Valley.

- **Finance:** Manages E-Comm’s financial operations, including financial reporting, audits, budgeting, payroll, accounts payable and receivable, procurement, and banking arrangements, ensuring fiscal responsibility and transparency.
- **Communications and public affairs:** Coordinates strategic communication initiatives for E-Comm, managing both internal and external communications.
- **Transformation office:** Responsible for strategic planning, risk management, project portfolio management and change management.
- **Data and analytics:** Provides data-informed insights to other departments and senior leadership, supporting decision-making with evidence-based intelligence across the organization.

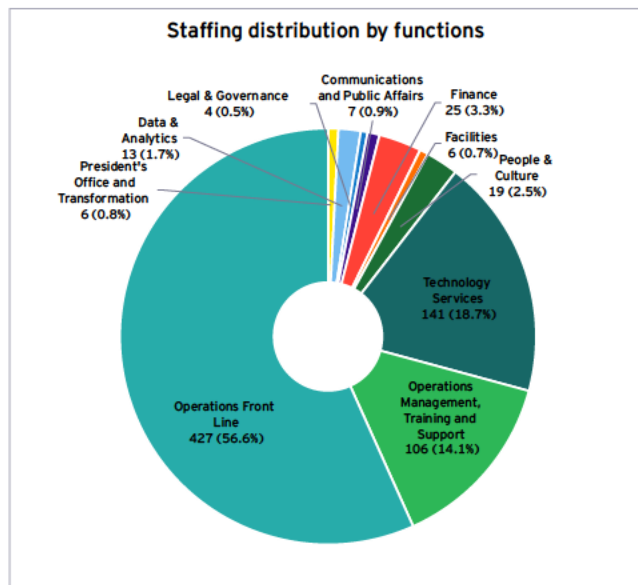


Figure 6: Staffing distribution by functions

As of June 30, 2025, E-Comm's total active headcount (without auxiliary staff and contractors) is 754, with 56.6% working in operational frontline, 18.7% in technology services and 14.1% in operations management, training, and support. The remaining 10.6% of the workforce is categorized under corporate services. Figure 6 shows the headcount numbers and percentage breakdown of the staffing distribution.

## Strategy

In 2018, E-Comm developed the (a)SPIRE2025 strategic plan, which includes five commitments: Service, People, Innovation, Relationships, and Expansion. Specific strategies were established under each commitment to achieve these goals. Since 2018, strategic planning retreats have been held but a refresh of the strategic plan, ending in 2025, has been paused pending the outcome of this review.

In 2022, the Transformation Plan was created and approved by the Board, outlining three objectives and five strategic pillars. The Transformation Plan aligns with the strategic intent set forth in the 2018 strategic plan. Its objectives include achieving service targets and improving the public safety experience, building a sustainable organization, and stabilizing financials through predictable, reasonable costs-to-serve. The Transformation Oversight Taskforce (TOTF) on the Board was established to oversee the progress of these initiatives.



The Transformation Plan includes five key pillars (illustrated in Figure 7). Transformation projects at E-Comm are prioritized based on their alignment to these pillars.

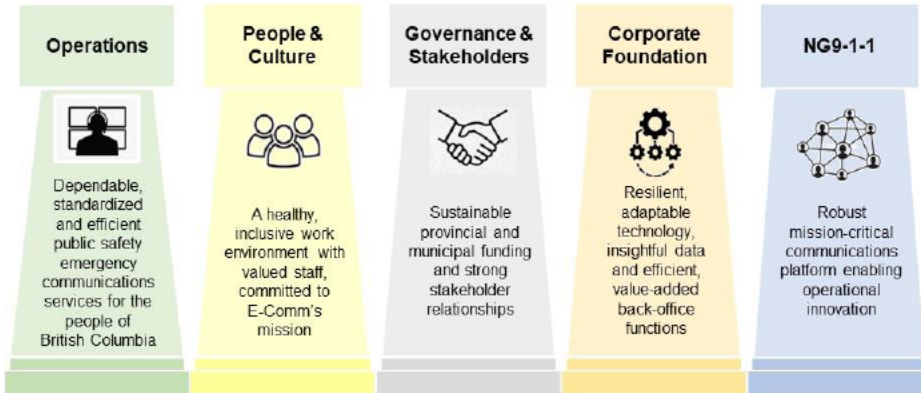


Figure 7: Pillars in the Transformation Plan

## Financial model

E-Comm operates on a cost recovery model, where revenues are generated through levies charged to clients (comprised of regional districts, municipalities and service providers such as fire and police agencies). These levies are based on the costs of providing services, including direct operational costs and allocated corporate expenses. E-Comm develops cost estimates each year during its annual budgeting process and invoices levies quarterly based on these estimates to meet its cash flow requirements. Because levies are based on cost estimates, E-Comm executes agreements without yet knowing the final costs of its services for the year. Major challenges impacting E-Comm’s financial model include increasing call volumes, accidental calls and pressures on municipal revenues.

## Revenues

E-Comm's primary revenue source comes from service fees charged for emergency communications services, including both operating a radio network for public safety services and emergency call taking and dispatch. The 2025 budgeted revenues are outlined in Figure 8.

E-Comm charges levies to recover the costs of services provided by E-Comm’s business lines. The organization’s business lines, types of levies, and categories used to analyze levies, are depicted with additional detail outlined in Appendix D.

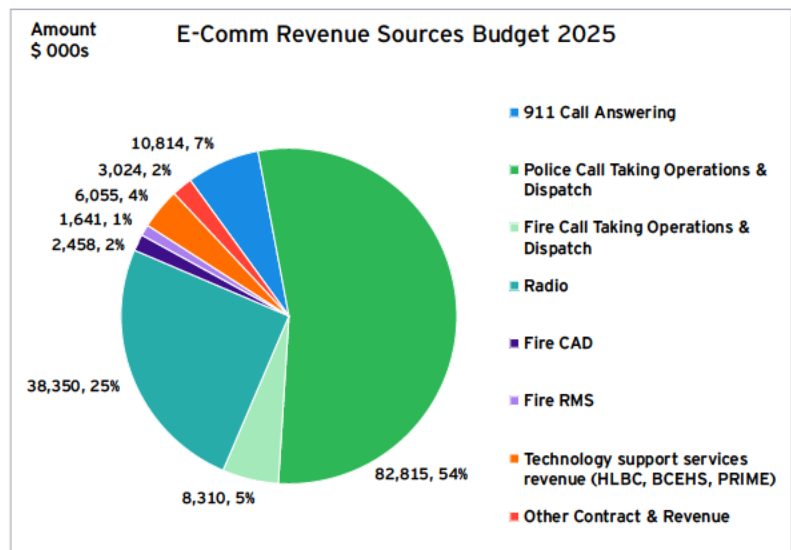


Figure 8: Revenue sources budget 2025 (Source: EY analysis of E-Comm data)

Business Line	Levy		Levy Category	
ECLMD Police	Dispatch Levy		Operations	
Fire Dispatch				
ECVI Police		Dispatch Facility & Related Levy		
Radio	Radio Levy	Remote Dispatch Levy	User Equipment Levy	Radio
911 PSAP	911 Call Taking Levy		911 PSAP	
Fire CAD	CAD Levy	CAD User Equipment Levy		Fire CAD <i>(part of Fire Technology in new Pricing Model)</i>
Fire RMS	RMS Revenue Levy		Fire RMS <i>(part of Fire Technology in new Pricing Model)</i>	

Figure 9: Overview of levy types

## Expenses

The expense structure includes direct costs for front-line operations (salaries, technology maintenance) and corporate costs that support the organization. E-Comm employs a bottom-up budgeting approach, engaging stakeholders to align financial planning with operational needs. This bottom-up approach is informed by top-down target setting to identify acceptable levy increase ranges. Historically, E-Comm has presented a one-year budget and five-year forecasts separately but is moving towards the co-development of one-year budgets and five-year forecasts at the same time.

## Operations

E-Comm established a wide-area radio network upon its inception. This network provides a uniformed platform to enable emergency services personnel to communicate across jurisdictions and agencies during critical situations.

Since 1999 they have expanded and evolved into an emergency communications organization, offering the following services:

- **911 Call Answering (911 PSAP)** - When callers dial 911, they are asked, “Do you need police, fire, or ambulance, and for what city?” Based on the response, the call is routed to the appropriate "secondary Public Safety Answering Point (PSAP)" specific to the requested service. Notably, E-Comm has been collaborating with the Crisis Centre of BC to explore the integration of mental health calls.
- **Police Communication Operations (ECLMD Police and ECVI Police)** - police emergency (ER) call-taking, non-emergency (NER) call-taking and dispatching.
- **Fire Communication Operations (Fire Dispatch)** - fire emergency call-taking, non-emergency call-taking and dispatching.
- **Fire Technology** - computer-aided dispatch (Fire CAD), record management system (Fire RMS) and technology services.

- **Technology Contracted Services** - Technology Services provides technology services and capabilities to partner organizations under a shared services contract type model.

	911 PSAP	ECLMD Police	ECVI Police	Fire Dispatch	Fire technology (Fire CAD, Fire RMS)	Radio	Technology & others
<b>Services</b>	9-1-1 Call-taking Down-streaming	ER and NER call-taking, dispatch, Canadian Police Information Centre (CPIC) entry	ER and NER call-taking, dispatch	ER and NER call-taking, dispatch	Fire CAD, fire hall alerting technology, fire mobile workstation support, Fire RMS	Equipment network	System hosting, network management, service desk, Geographic Information Systems (GIS), lease revenue, etc.
<b>Revenue (\$) 2025</b>	\$10.8M	\$65.6M	\$17.2M	\$8.3M	\$4.1M	\$40.4M	\$7.1M
<b>Revenue (%) 2025</b>	7%	43%	11%	5%	3%	26%	5%
<b>Funding agencies</b>	Regional districts	Police Boards, Municipalities	Police Boards, Municipalities	Municipalities	Municipalities	Police Boards, Municipalities	HealthLink BC, BCEHS, PRIMECorp, City of Vancouver

Table 2: E-Comm services

It is important to recognize that primary PSAP, secondary PSAP, and dispatch services are three distinct functions.

- Primary PSAPs answer the initial 911 call and determine which agency is needed.
- Secondary PSAPs receive the transferred call and gather additional information for that agency.
- Dispatch services involve assigning and directing emergency responders to the scene.

While secondary PSAPs often also perform dispatch, the two are not synonymous.

Use of E-Comm services is voluntary; local governments are responsible for emergency communication services and can select whether to provide services themselves, outsource to E-Comm, or another service provider. E-Comm currently provides primary PSAP services to 25 of the 27 regional districts in the province. There are three primary PSAPs in the province with the other two serving only the cities of Nelson and Prince Rupert (plus an Alberta-based service for the Northern Rockies Municipality in the far north-east of BC). Fraser-Fort George district has also announced it will become a primary PSAP beginning in 2026. A large geographical area of the province remains without access to 911 service.

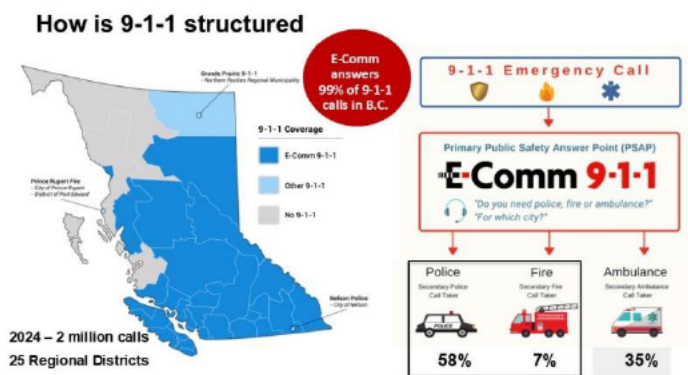


Figure 10: 911 Structure in BC

## Service levels

E-Comm has established call answering service level targets for its 911, police and fire call handling to support the delivery of timely, reliable, and accountable emergency response services. A summary of E-Comm's call answering service levels is provided in the following Table 3.

Call type	Call Answering Service Level Target
911	95% within 5s
Police Emergency	88% within 10s
Police Non-Emergency	80% within 180s
Fire Emergency	90% within 15s

**Table 3: E-Comm's call answering service level targets**

E-Comm has faced persistent challenges in meeting these call answering targets. In response to stakeholder concerns, E-Comm has initiated several measures to address these challenges. Key initiatives contributing to recent improvements include the introduction of a non-emergency police call-taker role, the consolidation of a provincial 911 call queue between the Lower Mainland and Vancouver Island, the establishment of a data and analytics team to enhance demand forecasting capability, and comprehensive training and upskilling programs. As a result of these efforts, service levels have shown significant improvement since 2023. Detailed year-over-year results can be found in Appendix E.

## Locations

E-Comm operates two geographically separated emergency communication centers. Its primary facility, Emergency Communications Lower Mainland (ECLMD), located in the City of Vancouver, houses the operations for 911 call-taking, police and fire dispatch, and administrative functions, as well as its core technology infrastructure. This facility is owned by E-Comm.

The second facility, Emergency Communications Vancouver Island (ECVI), located in Saanich on South Vancouver Island, was established in 2019 to support 911 call-taking and police dispatch services for Vancouver Island and surrounding regions. The current lease for this facility expires on January 31, 2029, with an option for one 5-year extension.

In addition to these two main centers, E-Comm maintains several supporting facilities that provide key technology infrastructure and operational flexibility. These include two sites in Burnaby: one is a training center (TC), lease expires December 31, 2028, that accommodates training facilities and serves as a back-up site. Currently, it is also used for day-to-day call taking to provide additional operational capacity. The other one is a business and technology center (BAT) that houses technology and corporate services functions; its lease expires on December 31, 2025, but has recently been extended by PRIMECorp, with E-Comm subletting the space from them.

E-Comm also operates a secondary data centre located in Kamloops to provide redundancy for systems primarily hosted at ECLMD.

## Next Generation 911 (NG911)

In June 2017, the Canadian Radio-television and Telecommunications Commission (CRTC) announced *Next Generation 911 - Modernizing NG911 Networks to Meet the Public Safety Needs of Canadians* which required all PSAPs across Canada to decommission old networks and transition to 'NG' by March 2027 (this date has been extended from the initial one of June 2023).

This transition requires replacement or upgrade of telephony applications and hardware to be compatible with NG911 standards. Future transformations within NG911 include nationwide introduction of Real-Time-Text (RTT) service, the first expansion of 911 services beyond existing voice-based services. The detailed timeline for the launch of these services has not been determined.

Ongoing opportunities and challenges associated with the transformation include:

- **New technological requirements:** The shift to NG911 introduces new technological standards and infrastructure needs, necessitating significant upgrades to existing systems.
- **Training and operational impact on call-takers and dispatch:** Call-takers and dispatch personnel will require training to adapt to the new systems and processes. This operational shift may affect response times and workflow during the transition period.
- **Budgetary implications:** The financial impact of the transition is significant, as it involves substantial investments in technology and training. Supplemental funding for the NG911 initiative has been provided by the provincial government. This includes \$121 million provided to E-Comm (including funding for partners) and \$60 million provided to the Union of British Columbia Municipalities (UBCM) to support local government training and other costs.

E-Comm has confirmed that it will launch on time or prior to the federally mandated date while remaining on budget for the implementation. Ongoing operational cost impacts remain unknown.

# Findings and recommendations

An overview of the analysis completed is outlined below, highlighting the significant findings that emerged for each of the in-scope workstreams: governance, finance, and operations. These findings serve as a foundation for identifying recommendations.

## Governance

E-Comm was established to provide an emergency wide-area radio network for the Lower Mainland; its governance structure and Board were designed to support this objective. The organization has since expanded its communication operations to serve police and fire agencies with primary PSAP, secondary PSAP, and dispatch services, becoming a much more complex organization. In such time, the legislation and definition of the provincial oversight role has not been updated. Both the Province and E-Comm identified that the existing governance structure no longer adequately addresses the needs of the organization. As such, the governance structure has been a focus area for E-Comm in recent years. E-Comm's Board has deferred approving any changes to the governance structure pending the outcome of this independent review.

The key thematic finding areas relating to governance include:

- Board governance
- Provincial role
- Stakeholder management, and
- Strategic planning and management.

## Board governance

As mentioned, E-Comm exists under the *Business Corporations Act (British Columbia)* and designated as an 'emergency communications corporation' under the ECC Act. The current Board includes 23 Directors, and the structure was originally established to oversee radio technology services, including shareholder representatives from that line of business. As E-Comm's role expanded to include emergency communication services, the Board composition did not significantly evolve to reflect its growing and more diverse operations or client base. While some operational clients—such as elected officials representing municipalities—now sit on the Board, the overall structure remains largely aligned with its original shareholder foundation. This has contributed to multiple ongoing governance challenges.

The size and composition of the Board impact the effectiveness of discussions and decision-making processes. Some Board members reported that questions raised in meetings are not always addressed, even as decisions move forward. For instance, Directors reported that when questions about the recent surplus were raised, they were not answered. Others noted that they are not provided sufficient information for decisions, or that information is presented to them as informational only, rather than for strategic consideration and decision. Board members reported not feeling unified given the large size of the Board and the varying set of interests and perspectives that make it difficult to create space for consideration at all.

Some Board members reported uncertainty about how to balance their fiduciary responsibilities to E-Comm with their roles representing member organizations or operational clients. Stakeholders noted that this dual role creates tension and may limit the Board's ability to act in the interest of the organization. This is common in an organization governed by a Board that is comprised of constituent members. It is commonly addressed through training, communication, or the ability for a Director to abstain from a vote. However, in

this situation, abstaining from votes during decision-making presents significant challenges due to the number of conflicts, thereby providing further support for the proposed changes to the Board structure.

The Terms of Reference for the Board outline the roles and responsibilities for Directors including emphasizing fiduciary duty to prioritize the interests of E-Comm. However, during stakeholder engagement, some Board members reported insufficient clarity and communication regarding the purpose and expectations of their roles, particularly when these roles conflict with their fiduciary duties to their primary organizations.

Interviews noted there has traditionally been a close working relationship between the Board Chair<sup>2</sup> and the CEO as a direct result of the large, complex Board structure. While this provides advantages given the current structure, it does reduce independence of the two roles, providing further support for the proposed changes to the Board structure detailed in recommendation 1-1.

Currently, Board materials tend to be lengthy with over 200 pages and could be better organized to facilitate discussions and decision-making. While some members appreciated the comprehensiveness of the materials, they expressed that the focus is often too heavily on operational agendas, lacking sufficient financial and risk information needed for strategic decision-making. Additionally, some Board members shared concerns about receiving information that feels overly controlled, which creates a perception of executive interference and limits the flow of information, resulting in communications that are often one-directional. There are opportunities to enhance Board decision-making by streamlining materials and improving the quality and transparency of information provided to Board members.

With respect to financial information shared to the Board, feedback from Board members indicates that no complete organizational budget is presented to the Board, rather only levy increases. This contributes to the sense of lack of transparency in financial reporting and can also contribute to challenges with expense management and strategic alignment of spending. For example, in the November 2024 Board package, high-level figures for levies were shown across Business Lines, but no prior year or trend data were presented for comparison.

The relationship between the Directors and the executive leadership team (ELT) members is generally positive and collaborative. However, as management seeks to find the right balance of information to provide to the Board, Directors have indicated that the information they receive may be limited. This challenge is not unique to E-Comm; finding the appropriate balance to ensure that the Board is not only informed of decisions but also actively engaged in strategic governance and input is a common issue. This situation may be exacerbated by the fact that the Board is predominantly composed of Directors who are also operational clients of E-Comm. This highlights the need for clear delineation of roles and responsibilities between the ELT and the Board.

At E-Comm, Board committees support governance by providing focused oversight. Feedback from Board members indicates that most substantive work currently takes place at the committee level, where there is more time for in-depth discussion than during full Board meetings. Given the large Board size and limited time available in full meetings, stakeholders saw value in ensuring committee discussions are more effectively connected to Board-wide decision-making. Encouraging broader participation in committee processes—such as inviting additional Board members to relevant workshops or discussions—was seen to enhance engagement, improve transparency, and surface a wider range of perspectives. A recent example was the Finance Committee's budget workshop, which focused on budget discussions and was open to all Board members. This provided an opportunity for questions and concerns to be raised. The effectiveness of this approach, however, depends on the level of participation or engagement from Board members outside the committee meeting.

A recent self-evaluation survey completed by Board members revealed feedback that aligns closely with information gathered from interviews with Board members and our findings. Notably, about one-third of

---

<sup>2</sup>The E-Comm Board of Directors elected a new Board Chair effective June 2025, during this review.

respondents indicated that diverse perspectives are not encouraged and expressed that meeting agendas often fail to prioritize critical topics and do not allocate sufficient time for meaningful discussion. It was also observed that the evaluation of standing committees and taskforces were conducted solely by their respective members, which does not encompass broader insights from the entire Board. This may hinder a comprehensive understanding of the committees' effectiveness.

Finding #1	Impact
<p>The current Board size, structure and composition were defined for a radio technology organization and do not support effective governance of an increasingly complex organization with broad province-wide service delivery.</p>	<p>This misalignment results in diminished strategic decision-making, loss of institutional memory, ineffective discussions, high turnover among Directors, and challenges in maintaining accountability, ultimately compromising the effectiveness of E-Comm's governance and service delivery.</p>

A high-performing governance Board should maintain an optimal size to facilitate effective discussion and decision-making. It should be composed of individuals with diverse yet complementary skills that are relevant to the organization. Additionally, the Board should have stable terms for its members to promote retention of institutional knowledge and support long-term strategic planning.

Leading practices of Board governance should consider:

- Board size of 8-12 members, including Board Chair. Too few members can limit diverse perspectives, while too large often suffer from diluted accountability.
- Directors selected based on essential skill sets required for good governance (finance, legal, technology/transformation, human resources, etc.) in combination with specific needs of the organization (emergency management experience, government and municipal experience, etc.)
- Independent Directors to clarify fiduciary duties, reduce inherent conflicts of interest, and allow objective oversight. This composition is associated with stronger governance and leads to more balanced decision-making.
- Board terms should generally be a minimum of three years, with a maximum tenure limit of nine years to support both institutional knowledge retention and continuity in strategic focus, balanced with introduction of new skills and perspectives.

## Recommendations

- 1-1. **Optimize the Board size to 8-12 independent members with an appropriate mix of skills to enhance governance effectiveness, accountability, and decision-making.**
  - Amending the Members' Agreement and Company Articles is required to execute this recommendation. Currently, Section 4.1 of the Members' Agreement and Section 12.1 of the Articles set the Board size between 3 and 25 members. This amendment will require ministerial approval and may encounter resistance from current Board members who prefer the existing structure or fear a loss of influence. Amendments to the Members' Agreement would occur on the assumption that the ECC Act does not change, or as an interim solution if new legislation is being pursued by the Province.
  - It would be helpful for the Province to support E-Comm in making structural changes to the Board due to the complexity, potential impact to public safety and the criticality of municipal support through the transition. Some ways the Province could do this include:

- PSSG could engage with the Crown Agencies and Board Resourcing Office to provide advice and support to E-Comm on new governance structures.
- PSSG could work with Ministry of Housing and Municipal Affairs to assist local governments with the transition.
- Define clear independence criteria for what constitutes an independent Director within E-Comm. This may include criteria such as no significant financial ties to E-Comm, no familial relationships with current Board members or executives, or no active employment with E-Comm shareholders.
- Define clear role and skill profiles required on the Board. This could include legal and governance, human resources, finance, technology, strategic communications, stakeholder engagement, call centre or emergency communications industry experience.
- When recruiting for these positions, consider diversity, equity, and inclusion (DEI) principles to reflect a range of perspectives, including geographically diverse representation to reflect the province-wide mandate of the organization.
- Consider engaging a professional Board recruiter and/or the BC government's Crown Agencies and Board Resourcing Office (CABRO) to identify potential Board candidates who meet the established criteria.
- Each time a new Board position is open, reassess and update the skills matrix to adapt to evolving organizational priorities, ensuring its ongoing relevance in guiding Board composition.

While this change has a complicated implementation path, it is critical for the success of the organization. Board composition and structure changes should be implemented closely with the recommendations made in the stakeholder management section of this report. Proactively managing stakeholder concerns will support E-Comm's longer term client management as all the shareholders currently on the Board represent select E-Comm's clients.

**1-2. Update the Terms of Reference for the Board of Directors to include a structured Board tenure policy and cycle recruiting for positions to ensure staggered term-end across the positions.**

- The tenure policy should consider maintaining institutional knowledge and the level of complexity in the operating environment. A minimum term of three years, with a maximum of three terms (totalling nine years) is advised.
- This change would also require amendment to the Articles of the Company (Article 13.1), which mandates that all Directors retire at the Annual General Meeting.

### **In-progress proposed governance changes**

As mentioned, E-Comm was in process of proposing governance changes to the Board when this review was announced. Deloitte was engaged by E-Comm to conduct a governance review and has provided several recommendations for enhancing Board governance. In response, E-Comm has proposed a new governance model based on these recommendations. The method or approach for implementation would need to be developed if accepted.

This model suggests a smaller Board size of 9 to 12 Directors, with all Directors recruited based on their skills and experience and are elected through a vote by all shareholders rather than being designated. The term length for Directors would be extended to four years, with the possibility of serving up to two terms. These changes align with leading practices of effective Board governance and our recommendations outlined below.

Further proposed changes to the structure include:

- Granting shareholder status to all call-taking and dispatch clients to balance the interest between shareholder clients and non-shareholder clients.
- Separation of audit responsibilities from the Finance Committee to form a new Audit and Risk Committee, which will also oversee enterprise risk management.
- A new Public Interest and Government Relations Committee, and
- Existing Service and User Committees would be replaced by new service governance bodies to enhance their effectiveness and responsiveness to stakeholders needs.

The proposed future state model created by E-Comm and Deloitte is illustrated in the figure below.

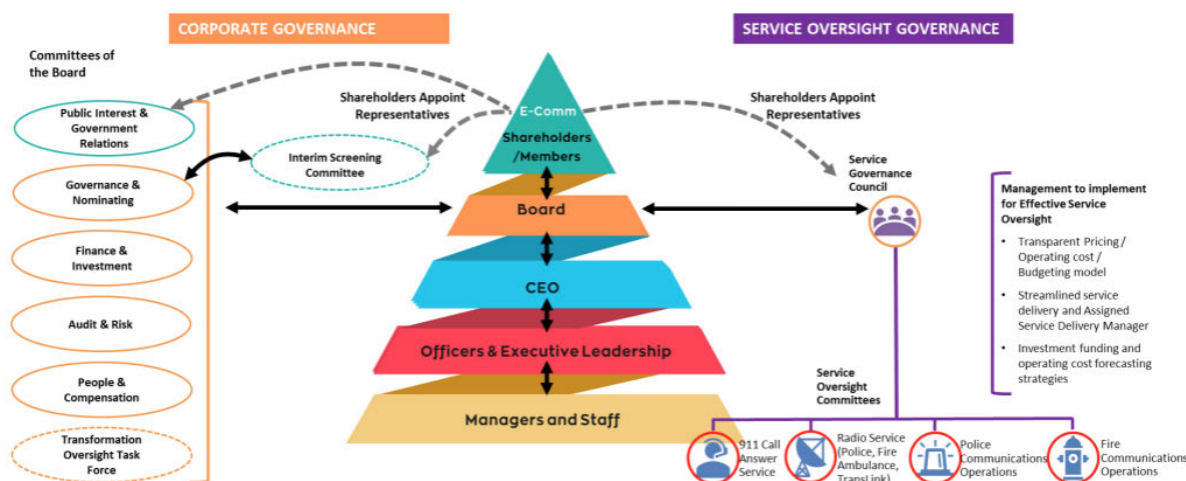


Figure 11: E-Comm's proposed future state governance model

The proposed model is well-positioned to maintain a strong client voice within the governance structure, while enhancing the independence and integrity of Board-level decision-making. However, the effectiveness of this model will ultimately hinge on clarity of role delineation and the simplicity of its implementation. To enable effectiveness, several foundational elements must be established and considered in implementation:

- Clearly defined roles and responsibilities for the Board, Directors, and each committee are essential. This includes articulating the distinct mandate of each committee to avoid overlap, strengthen accountability and enable more targeted and efficient governance.
- A structured delegation of authority that delineates decision-making boundaries. This includes defined thresholds for when operational matters must be escalated to the Board, particularly those with significant financial, strategic and reputational implications. It also should limit shareholder and member decision making authority to significant corporate structure matters, rather than strategic direction or operational.
- Meaningful contribution by the Service Governance Council should be clearly articulated to support client contribution to Board decisions and clear requirements of the Board to report on follow-up items to support two-way communication.
- Formalized decision-making protocols should be established for situations of disagreement, including clear dispute resolution pathways and defined authority for final decision-making (which should remain with the Board).

- Consideration to the future state of the emergency communications ecosystem. If the provincial role changes, the governance structure and model will need to consider these changes and the impact(s) it may have on roles and responsibilities.

## Provincial role

Of the 23 directors on the E-Comm Board, two are representatives of the provincial government. While this is the extent of the Province's formal role around the governance of E-Comm itself, there is a more complex discussion around its involvement in PSAP services in British Columbia and the general emergency communications environment.

The current governance framework for PSAP services is outlined in the *Emergency Communications Corporation Act (ECC Act)*, the *Police Act*, and the *Emergency Health Services Act* as noted above. These statutes assign authority for specific components of emergency communications but do not establish a unified legislative or governance model covering all PSAP and dispatch functions.

In British Columbia, for example, E-Comm acts as the secondary PSAP and dispatch centre for many police agencies such as Vancouver Police Department, where the call-handling and dispatch occur together. In contrast, for medical emergencies, E-Comm acts only as the primary PSAP, transferring the call to BC Emergency Health Services, which then performs its own secondary PSAP call-handling and ambulance dispatch under provincial health legislation. These distinctions matter because each function could fall under a different legislative mandate, which has direct implications for how the Province might define its future accountability or responsibility.

Within the current state emergency communications ecosystem, E-Comm serves as the main service provider, managing approximately 99% of primary PSAP services. E-Comm also provides secondary PSAP services, which in many cases include dispatch for select police and fire agencies. Both primary and secondary PSAP services fall under the jurisdiction of local governments.

The current structure - characterized primarily by E-Comm as the main primary PSAP service provider - has developed due to natural service expansion driven by customer needs and opportunities, and practical factors such as operational efficiencies and cost savings, rather than through deliberate or coordinated policy direction. To date, it does not appear that Government has made a decision regarding the level of provincial involvement in the emergency communications sector outside of current legislation, or the pursuit of a consolidated, province-wide approach. The absence of such a decision means there is no clear definition against which to measure the Province's current role or responsibilities.

In an environment dominated by a single primary PSAP service provider, the absence of this defined role has generated several challenges including:

- **Absence of province-wide coordination or long-term strategic planning:** The system continues to rely on regional arrangements and locally driven decision-making by governments, regional districts, and E-Comm.
- **Absence of consolidated service standards:** Inconsistencies in services and targets affects workforce planning, staff training, and operational management, and communications efforts for E-Comm. It also results in variations in service across the province.
- **Funding burden and rising costs:** The reliance on municipal funding for emergency communications services creates financial pressure for municipalities, as rising E-Comm levies must be absorbed within limited local budgets. E-Comm also noted that an unpredictable client base hinders its ability to plan long-term (e.g., staffing, space, resources).
- **Challenges in resilience and redundancy:** While E-Comm has size, scale, and resource advantages in developing resilient and redundant infrastructure, stakeholders noted it may not benefit from the

inherent diversification of a series of smaller providers. In short, the risk associated with insufficient resilience and redundancy capabilities at E-Comm is province-wide.

- **Equitable resource allocation and service availability:** Stakeholders noted ongoing challenges related to equitable resource allocation across the province, particularly for rural and remote communities. Additionally, there are concerns about inconsistent availability of 911 services in some areas.
- **Public expectations for reliable service delivery:** There is a noted increase in public expectation for reliable and efficient emergency services. The Union of British Columbia Municipalities (UBCM) has called for a review of the 911 delivery model to ensure that services are reliable, affordable, and effective for all communities.
- **Capacity for transformation and innovation:** The federally mandated transition to NG911 presents a pivotal opportunity to reimagine emergency communications. This shift goes beyond a technology upgrade to a more adaptive, inclusive and innovative service. Opportunities include enabling real-time text for enhanced accessibility, expanding services for First Nations and rural communities, and integrating a mental health response option alongside police, fire and ambulance services. Limited provincial involvement has constrained coordinated efforts essential to fully realizing these opportunities or defining associated risks.

Finding #2	Impact
<p>The Province has no defined role in overseeing emergency communication services and there is currently no appropriate policy framework, including adequate legislation, to enhance that role.</p>	<p>The absence of a Provincial decision on its role means there is no reference point for measuring intended outcomes or holding the Province accountable for results. This absence of direction has contributed to governance and operational challenges, with inconsistent standards, fragmented governance, and limited long-term planning capability across the system.</p> <p>The Province’s current role may not be aligned with the public’s expectation of provincial accountability for public safety should the current ecosystem fail. This could result in the Province being unable to act effectively in an emergency if its responsibility has not been formally defined.</p>

The nature and extent of the Province's role in future state is a policy decision with several factors to consider, each of which has important trade-offs to consider. Three areas of consideration include:

- **Governance** – how responsibilities and decision-making authority for PSAP operations are structured and exercised, including the respective roles of the Province, local governments, regional districts, and third-party providers.
- **Standards and regulations** – the frameworks, performance expectations, and oversight mechanisms that guide the delivery of PSAP services and hold providers accountable.
- **Funding** – how PSAP services are financed, including sources of funding, allocation methods, and sustainability (control around cost growth and reliability of long-term funding sources).

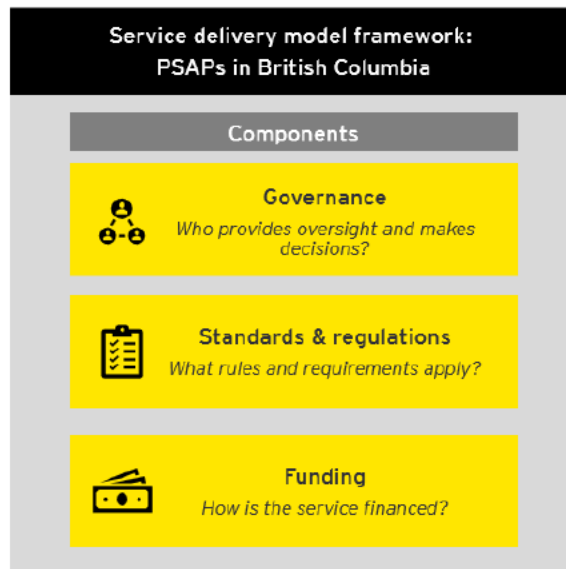


Figure 12: Service delivery model component

## Recommendations

- 2-1. Clearly define the Province's role within emergency communications and align legislative mechanisms to support clarity in roles and responsibilities, effective governance, performance management, and the ability to influence impacts to public safety.**
- In doing so, it is important to include distinction between primary PSAP, secondary PSAP, and dispatch services. Formalizing the Province's role – or considering changes to the service delivery model – may take time and require multiple stages of government decision. However, this recommendation is foundational for coordinated action and resolving lack of clarity among key actors within the sector.

## Stakeholder management

Strong stakeholder relationships are an essential component of effective governance. As a publicly funded and life-critical service, E-Comm must maintain transparent, responsive and accountable engagement with its clients and stakeholders. Sound governance should integrate stakeholder perspectives into decision-making process and establish mechanisms to build and sustain trust.

Stakeholder trust was identified as a significant challenge for E-Comm. Trust of clients was compromised due to past operational issues, particularly low service levels, and current rising levies. Although E-Comm has made operational improvements and stakeholders expressed satisfaction with the current operational service levels, rising levies and financial pressures impede the rebuilding of that trust. E-Comm's inability to provide long-term cost forecasts and clearly explain cost drivers has been perceived as lack of transparency, further complicating that trust-building process.

E-Comm has made considerable efforts to enhance relationships through more frequent reporting; however, the quality and effectiveness of these materials was noted as insufficient in clearly responding to client concerns and providing transparent, balanced information. Clients have commented that the presentation by E-Comm often fails to address specific questions directly, consuming valuable time before reaching key points. While information is shared, it is not provided proactively or transparently from the outset. Some clients feel that the reports tend to be overly corporate and self-serving, emphasizing successes without

adequately addressing service quality or associated costs. There is a strong desire for more concise reports that include cost elements presented in a clear and understandable manner.

The size and composition of the Board also makes it difficult for E-Comm to proactively and efficiently manage client relationships as some clients have representatives on the Board (because they are also shareholders) and are privy to more detailed reporting where others who do not have representatives on the Board, are not. There is also added complexity in the stakeholder environment as there are governance-level stakeholder relationships that occur with local governments, and operational-level relationships that occur with Police Boards, fire organizations, etc. related to service levels and procedures. The different client and shareholder contacts do not always connect with each other adding a layer of communication and connectivity.

Local governments often act as contracting parties and funding agencies, while police and fire agencies are the primary users of the services. This duality can lead to communication challenges, as the interests and priorities of local governments may not always align with those of the service users. Such misalignment can create confusion and hinder effective collaboration, ultimately affecting the service delivery. For example, service users may not fully understand the agreements and might request services that fall outside the agreed-upon scope, resulting in E-Comm's rejection of these requests being perceived as uncooperative. Without a robust client management framework in place and thoughtfully communicated with service users and client contracting authorities, E-Comm is left to manage each request, relationship or contact, and contract individually and on an ad hoc basis.



Figure 13: E-Comm's operational clients

There is concern among Board members that changes to the Board structure could weaken their voice as a client within governance. As changes are made to the Board structure, which are necessary for the success of the organization, it is important to also consider bolstering the stakeholder engagement framework to ensure appropriate perspectives are heard at both the governance and operational levels.

Finding #3	Impact
<p>The stakeholder network is complex, and no formalized stakeholder management framework exists resulting in ad hoc, relationship-based management.</p>	<p>The complexity of stakeholder relationships leads to misalignment of interests and communication difficulties, which may diminish satisfaction and trust. This exists across governance level relationships relating to levies and contracting, as well as operational level relationships relating to performance reporting and services.</p> <p>The erosion of stakeholder trust, exacerbated by rising levies and unclear cost forecasting, undermines E-Comm's ability to maintain strong relationships with clients, ultimately affecting the organization's reputation and effectiveness in delivering critical services.</p> <p>Client satisfaction is critically important to the future and sustainability of E-Comm (structurally, contractually, and financially).</p>

The Service and User Committees have the potential to serve as valuable engagement platforms for clients but are currently underutilized. The Chair and Vice-Chair of the User Committee are not Board members and are given limited time during Board meetings to report on committee discussions. Currently, they do not participate in broader Board discussions. These committees are not well integrated into the governance process, as their reports form presentations rather than input to defined decision items or action items which are followed up on. The committees are rarely consulted on Board decisions. As a result, members of the committees reported engagement has declined over time. Clarifying the mandates and improving their roles towards more meaningful contribution with the Board would help strengthen their purpose and effectiveness. Introducing mechanisms for the committees to formally provide input or endorse specific issues, within set parameters, could increase their influence and support stronger service delivery oversight. This is especially important as changes are made to the Board structure itself. The voice of Service and User Committees should be factored into key decisions.

To enhance client management, E-Comm is in the process of establishing a more structured approach. Following Deloitte's recommendation to strengthen client relationships by adding an account manager role, the organization has hired a Director, Operations Relationship Management to serve as a liaison between clients and internal departments, facilitating improved communication. This Director, who joined in January 2025, has spent much of his time understanding the stakeholder landscape due to the complexity of these relationships. Since the onboarding on this role, E-Comm has noticed improved coordination and responsiveness in managing operational client relationships. However, there is no client relationship management (CRM) system or formal stakeholder management framework in place. This reliance on personal relationships increases risk of relationship deterioration with key stakeholders if those individuals leave the organization. To mitigate this, a structured and transferable framework should be established to maintain continuity and facilitate knowledge transfer.

To further strengthen stakeholder relationships, E-Comm is in the process of hiring a new Government Relations Manager. This is a governance-oriented role, will focus on corporate updates and stakeholder engagement. It is distinct from the Director, Operations Relationship Management, who leads on operational matters such as levy and service levels discussions. Close collaboration between these two roles will be essential to maintain clear and aligned messaging.

The impact of this will further be felt with upcoming changes to the governance structure. While governance changes must be prioritized to support organizational effectiveness, appropriate consideration should be given to stakeholder voices.

## Recommendations

- 3-1. Define a comprehensive stakeholder framework that is both complementary and aligned to the new governance model. The framework should clearly outline roles and responsibilities (both on behalf of the client and shareholder organizations, as well as E-Comm), and should reflect both governance-level relationships and operational relationships.**
  - Identify stakeholders and categorize based on interest group (i.e. clients, shareholders, local governments, and operational partners). For each category, formally define roles required for engagement, including responsibilities so organizations have guidance to assign the appropriate individual to the role. This is important as it will put structure around who is being engaged, how, and when, while controlling the number of individuals who are engaged on an ad hoc basis. For example, "Operational Lead" who is responsible for operational performance, escalating performance concerns, and the primary point of contact on operational procedures and issues impacting operations, and "Contract Administrator/Owner" who is responsible for paying fees, negotiating contract terms, and the primary contact person for discussions on levies.

- Outline how E-Comm will engage with each role defined, including both formal and informal vehicles (i.e. monthly newsletters, reporting dashboards, committee meetings, etc.) All individuals who do not have a formal role assigned to them within the stakeholder framework would be asked to liaise through those assigned to limit E-comm's ad hoc engagements.
- The developed framework should be thoroughly documented so it does not rely on individual parties or specific knowledge/relationships to know who plays what role and how they should be communicated with. This will also support continuity if specific roles within E-Comm change.
- Regularly assess the effectiveness of the stakeholder engagement framework and adjust optimize communication approaches and clarify responsibilities, ensuring the framework continues to meet stakeholder needs over time.

It is important that a new stakeholder engagement framework is fully developed and implemented either before, or at the same time as, changes to the Board structure to maintain stakeholder continuity, engagement, trust, and transparent lines of communication.

## Strategic planning and management

The executive leadership team (ELT) has seen significant turnover in recent years. Seven out of the eleven roles were filled between 2022 and 2023, including one newly created position: Chief Transformation Officer. The team has also expanded to include Executive Directors. ELT members reported a strong collaborative working relationship with some challenges related to the size of portfolios and ability to cross-manage dependencies between teams.

Similar challenges were reported as with Board governance relating to limited flow of information. E-Comm departments have historically operated in silos with limited data sharing. E-Comm is working to build capabilities for improved collaboration between departments to support data-informed decision-making with some ELT members reporting seeing recent improvements.

### Strategic focus and prioritization

In 2018, E-Comm developed the (a)SPIRE2025 strategic plan. Since then, COVID-19 occurred, and the organization has faced challenges with its operational performance, leading the ELT to concentrate more on resolving these operational issues rather than on strategic initiatives. There were discussions in the Board in late 2024 regarding the approach to updating this strategic plan, but a decision was made to pause the update in early 2025, pending the outcome of this review.

In 2022, the Transformation Plan was created that aligns with the strategic intent set forth in the 2018 strategic plan. The strategic plan defines the long-term goals and priorities of an organization, setting the overall direction to guide decision-making, which addresses the "what" and "why." In contrast, the Transformation Plan outlines how the organization will undergo significant changes to achieve a new state, focusing on the "how". During our stakeholder engagement with the ELT, it was noted that the strategic plan was rarely mentioned. Instead, the focus was primarily on the Transformation Plan. The Transformation Plan appears to compensate for the outdated strategic plan but incorporating all initiatives, rather than transformative projects flowing from strategic priorities defined and approved by the Board.

Despite the absence of updates to the 2018 strategic plan, stakeholders reported that recent annual strategic planning retreats, which include Board of Directors, have still occurred each year. Discussions, however, have been largely dominated by challenges related to the governance and financial models, with little emphasis on defining target organizational outcomes, leaving the organization without a clear direction for success. The changes that E-Comm has experienced since the 2018 plan was published, including

significant operational changes associated with the COVID-19 pandemic, necessitate a revised strategic plan and way forward for the organization.

Following the reviews and assessments conducted by external consultants - Finance in 2021 (BDO), Security Assessment and Operations in 2021 and Business Continuity in 2022 (PWC), Governance and Enterprise Risk Management in 2024 (Deloitte), E-Comm has identified a list of transformation projects to address recommendations. The organization has categorized its transformation projects into priorities A, B and C, with A designated as the top priority. These projects are prioritized using four differently weighted criteria: service level, efficiency, risk mitigation and sustainability. To track progress of initiatives stemming from previous reviews and assessments, E-Comm has initiated a process incorporating these recommendations.

In reviewing the Transformation Plan, EY noted that initiatives can be more appropriately framed as focus areas, rather than transformation projects in some instances. For example, the 9-1-1 Provincial Mandate initiative is primarily focused on advocacy for statutory oversight of 911 governance and provincial funding support, which should be recognized as a strategic focus. Similarly, FIFA planning is a one-time operational effort.

Notably, as shown in Figure 14 below, most of the projects within the Transformation Plan are classified as Priority A. Due to past challenges in meeting service level targets, the organization prioritized many initiatives to urgently address critical service gaps. While this focus is understandable, the volume of high-priority projects has led to competition for internal resources. As a result, some projects have been deferred, particularly due to capacity constraints within the Technology Services team.

Prioritization of initiatives presents a challenge due to balance of capacity across the organization and alignment of initiatives to strategic level needs of the organization. Attempting to address every initiative immediately creates risk as well as a lack of clarity as to what the priorities are. Ineffective prioritization can result in capacity challenges in meeting objectives, challenges with strategic planning, improper use of resources, inefficient project execution, and workforce issues such as burnout. It is crucial to ensure that there is enough capacity to maintain business stability and continuity and align the prioritized initiatives to strategic objectives, rather than dedicating resources across all projects.

Recently, E-Comm has refined its project prioritization process to include identification of resource requirements and determining requirements can be met before committing to new projects. This process refinement may not be sufficient, as the underlying issue appears to stem from the absence of clear strategic direction to effectively guide the prioritization process and an outdated strategic plan.

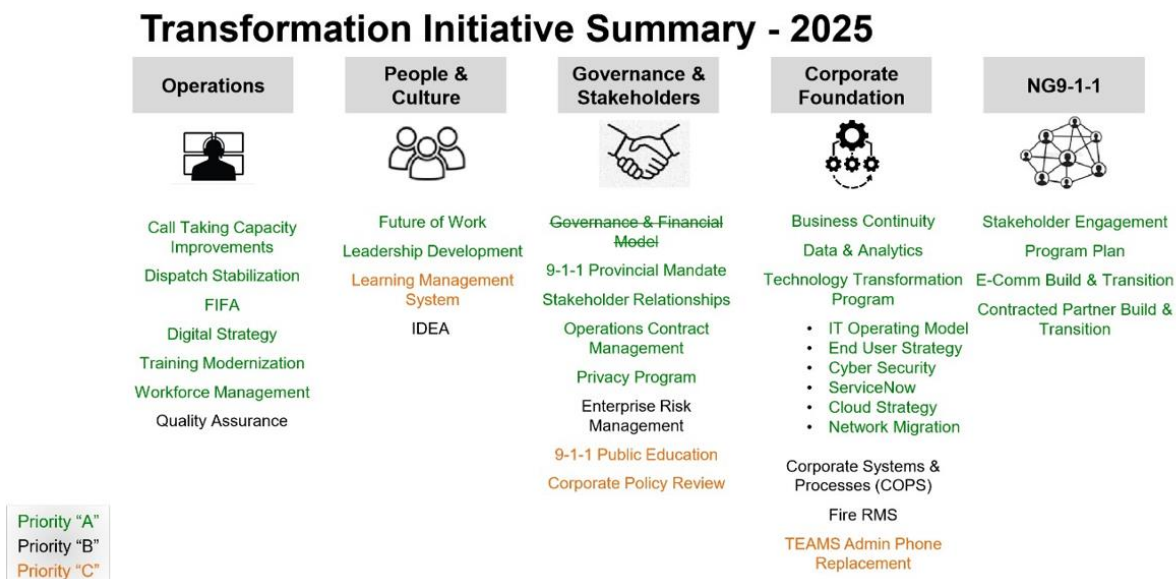


Figure 14: Transformation initiative summary - 2025

The resources required to deliver the Transformation Plan form part levy increases and the impact on stakeholder relationships. This is especially important to consider when understanding the absence of a link to Board-approved strategic priorities.

Finding #4	Impact
<p>Operational realities including the COVID-19 pandemic and challenges meeting service targets have required the ELT to focus on operational issues rather than strategic planning and prioritization.</p>	<p>This misalignment and lack of strategic focus leads to reactive decision-making, insufficient updates to the 2018 strategic plan, and an inability to effectively prioritize initiatives within the Transformation Plan (and more broadly across the organization), ultimately risking the organization's stability and long-term objectives.</p> <p>If funding agencies do not recognize the rationale and benefits to them of levy increases (whether driven by operational service levels or organizational strategic initiatives), there is a significant relationship risk.</p> <p>This challenge is compounded by governance and stakeholder management complexity; without a strategic and effective Board to approve necessary expenditures, managing stakeholder relationships and expenses within the organization becomes increasingly difficult.</p>

**Recommendations**

- 4-1. **Shift strategic planning to a three-year plan to enable greater responsiveness to key issues as they arise, and higher impact strategic decision making.**
  - Consideration should be given to a three-year rolling strategic plan to support annual updates to projects being considered, ongoing trade-off decisions to prioritize focus areas, and annual roadmap drafting (with the most detail applied to the year immediately following).
  - The strategic plan should include actionable year over year objectives and prioritized projects. Larger projects that are transformational in nature (impacting the whole of organization or are significant in resource requirements to execute) should cascade to the Transformation Plan where each prioritized initiative is outlined clearly in a roadmap with identified resource requirements and timelines. The Transformation Plan should not include any projects that were not prioritized within the strategic plan.
  - Strategic planning should consider trade-offs in costs, operational impacts, risk, and timing.
  - The strategic plan should also include key performance indicators (KPIs) to measure progress against objectives (i.e. operational efficiency, stakeholder satisfaction, financial performance, etc.)
  
- 4-2. **Refocus the ELT on strategic priorities and critical challenges requiring executive direction to enable clearer prioritization, more effective governance and accelerated transformation progress.**
  - Recent developments in ERM provide a useful example of how this strategic shift could be supported. Although still being embedded, the ERM framework introduces structured

mechanisms—such as risk tolerances, escalation thresholds, and distributed oversight—that enable the organization to manage routine risks at the appropriate level. Only risks that exceed defined thresholds or where mitigation is ineffective are escalated to leadership, helping to focus attention where it matters most.

- Other considerations include:
  - Defining a clear strategic mandate for the ELT, centered on direction-setting, transformation leadership, and oversight of key risks and priorities.
  - Re-focusing ELT to C-Suite members, allowing Executive Directors to focus on bridging between operations and escalating to ELT only when certain thresholds are met.
  - Delegating routine operational issues to appropriate levels of management, within clearly defined thresholds and accountability frameworks; and
  - Focusing ELT conversations and decisions on big-picture risks, how the organization is performing, and whether key initiatives are on track with the overall strategy.

## Performance and reporting

The absence of an updated strategic plan update makes it challenging to determine where the organization stands against its intended outcomes. The existing strategic plan from 2018 also did not outline any targets or metrics that would support assessment of progress against plan. Additionally, E-Comm currently does not have a formal policy to identify low organizational performance that would necessitate intervention.

Multiple aspects of corporate performance are tracked and reported to Board committees. This includes human resources (HR) metrics presented to the People & Culture Committee (PCC), public awareness and confidence metrics derived from Ipsos surveys reported to the Governance and Public Affairs Committee (GPAC), and an operational dashboard that includes service performance, HR and limited financial metrics for the Finance Committee (FC) and Transformation Oversight Taskforce (TOTF). While operational metrics reporting has improved over recent years, financial metrics remain limited, with only actual spending against the budget included.

E-Comm publishes semi-annual and annual Transformation Plan reports on its website to keep external stakeholders informed about priority initiatives. As part of the Transformation Plan, E-Comm has committed to leveraging its Data Analytics capabilities to develop HR and operational performance dashboards for external stakeholders. Within the past year, corporate performance reporting to external stakeholders has started to include human resources (HR) metrics such as active headcount, turnover rate and vacancy rate through regular dashboard reporting, however there is a notable absence of effective financial health indicators. Given the strategic importance of the financial model and ongoing challenges related to increasing levies, strong reporting on budgets, expenses, capital spending and contingency planning could help address stakeholder concerns.

E-Comm does not have a formal organizational scorecard to assess overall health or performance of the organization over time. For instance, incorporating financial health indicators such as cost per call along with stakeholder satisfaction metrics derived from surveys and feedback could provide valuable insights; risk management reporting on compliance and risk mitigation progress would enhance the overall assessment. The absence of comprehensive reporting makes it challenging to evaluate organizational effectiveness and progress. Several Board Directors have identified this limitation as a barrier to accountability. There is an opportunity to develop a structured framework that assesses the organization's effectiveness in a holistic manner over time and enable real-time shifts in focus as needed.

Finding #5	Impact
E-Comm does not have an organizational scorecard to measure progress or success.	This absence of comprehensive performance reporting and metrics hinders accountability and informed decision-making, limiting the organization's ability to identify areas for improvement and adapt to changing circumstances, ultimately affecting its operational and strategic success.

## Recommendations

- 5-1. Develop a structured Corporate Performance Measurement Framework aligned to strategic planning objectives to support regular and timely updates against plan as well as ongoing organizational reporting.**
- Begin by identifying and prioritizing key performance indicators (KPIs). KPIs should reflect strategic priorities and may include operational metrics (e.g., call answer levels, average speed of answer, abandoned call rates), financial indicators (e.g., cost per call, budget variance, revenue per employee), and stakeholder satisfaction measures (e.g., customer satisfaction and employee engagement scores).
  - Define clear measurement criteria for each KPI, including data sources, reporting frequency (e.g., monthly, quarterly), and designated roles for data collection and analysis. This will ensure a consistent and accountable approach to performance monitoring.
  - Develop a consolidated corporate scorecard that visually presents KPI results, targets, and trends in a clear and accessible format. The use of visual tools such as traffic light indicators (e.g., red, yellow, green) can help stakeholders quickly assess organizational performance and areas requiring attention.
  - Consider how technology can be leveraged over the longer term to enhance performance monitoring and reporting. Real-time dashboards, automated data feeds, and advanced analytics can support more timely insights and reduce the burden of manual reporting. While not all capabilities may be implemented immediately, planning for technology integration will strengthen the framework over time and support more agile, data-informed decision-making.
  - Establish a consistent reporting process to the Board, with scheduled updates that highlight key trends, insights, and performance issues. This will promote transparency and keep leadership informed of progress against strategic goals.

## Finance

Finance and the financial model continue to be a focus for E-Comm, dominating strategic planning and Board meetings due to concerns over the growth in costs incurred and recovered through levies over the past five years. Additional concerns include the appropriateness of the allocation of costs to clients, and the absence of predictability, transparency, and consistency of changes to levies each year. These concerns are well-known and consistent themes throughout this review. They present significant impacts to E-Comm's operational clients, both in the context of trust in E-Comm as well as their own financial planning and cost management.

The Finance section of this report explores E-Comm's financial structure and processes in conjunction with some of the challenges raised in the Governance section. The key thematic finding areas include:

- Budgeting
- Expense management
- Corporate cost allocation
- Translating costs into levies, and
- Capital funding.

An overview of E-Comm’s current state financial processes is detailed in Figure 15 below. It notes a flow of costs and their recovery through levies. More detailed steps for each process is outlined in Appendix F.

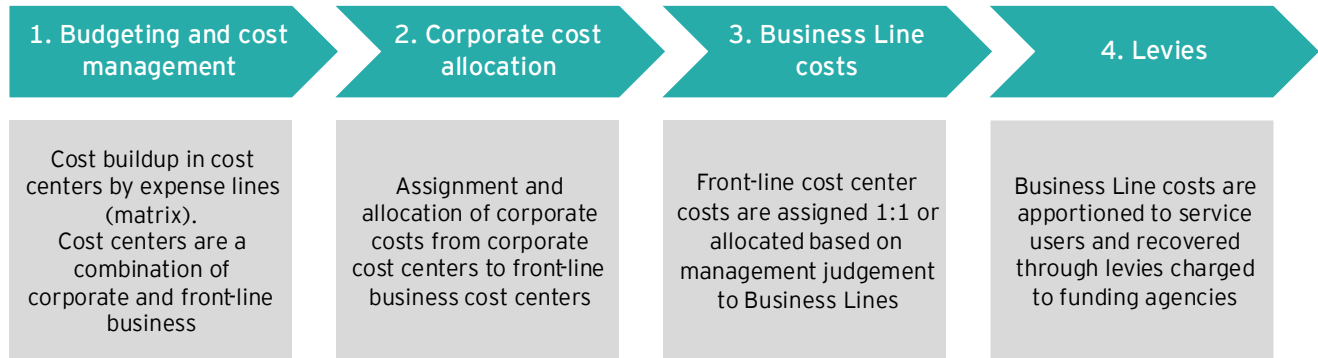


Figure 15: High-level financial process flow

To address known challenges, E-Comm is in the process of drafting a new financial model that aims to more accurately assign and track costs to Business Lines as well as leverage an evidence- or driver-based approach to recover those costs through levies; this model was presented in a workshop open to Board members as part of a financial metrics discussion in June 2025 but has not been accepted or approved for implementation.

## Budgeting

Below is an overview of the four steps in the annual budgeting process.

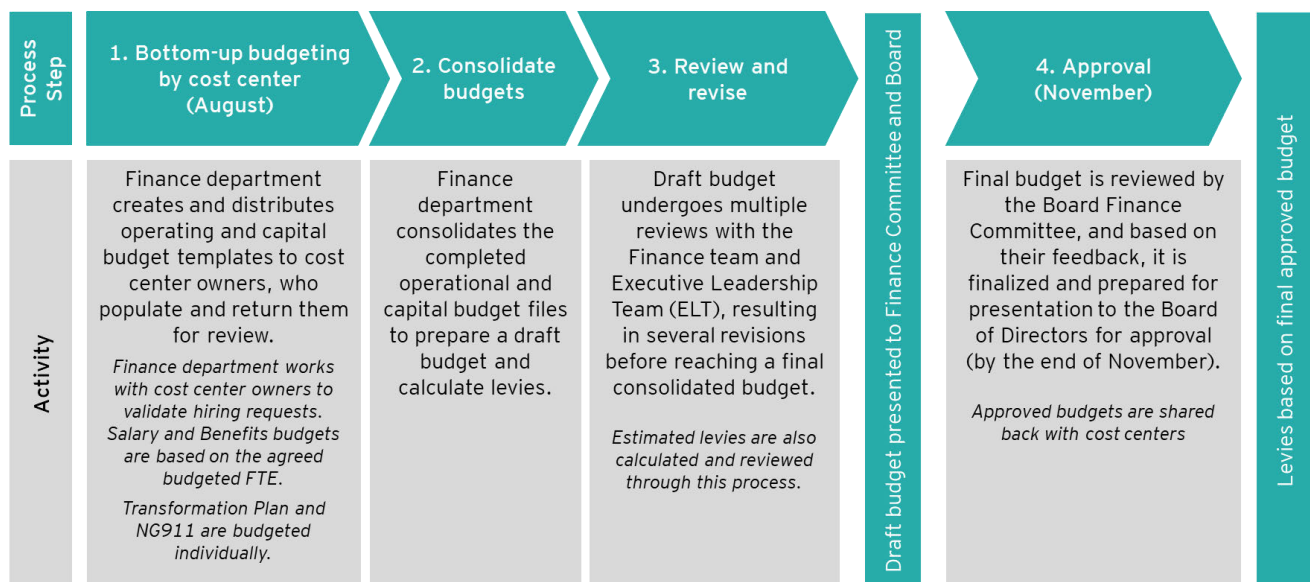


Figure 16: E-Comm budgeting process overview (Step 1 of Figure 15)

E-Comm initiates its budgeting process by conducting engagement sessions with its service users and funding agencies, typically starting in August of each year. Capital budgets are included in this budgeting process (more details in the Capital funding section). The collaborative approach allows for the gathering of feedback, which is considered before the formal budgeting process begins.

Currently, E-Comm presents a one-year high-level budget to its service users and funding agencies (approved in November) annually, with a five-year forecast developed separately (approved in April-June). E-Comm is, however, working towards enhancing visibility predictability by preparing the one-year budget and five-year forecast simultaneously. It is critical for E-Comm to have sound forecasting processes in place when providing longer term forecasts to these groups to ensure the results are reliable and appropriate to use in their financial planning processes. These forecasts should also align to E-Comm's strategic priorities.

During the budgeting process, Cost Center (CC) owners are responsible for the bottom-up budget development of budgets, engaging in discussions with ELT for approval. While the Finance department reviews and recommends changes to CC budgets, the accountability to approve or deny changes is with ELT. Budgeting for some key initiatives occurs through the Transformation Plan. Many public sector organizations budget strategic programs in a similar manner as it allows allocation of specific resources and funding to support innovative projects without impacting the existing budget for ongoing operations. However, there does not appear to be a link between E-Comm's strategic plan and the bottom-up budget development beyond this separate budgeting for some strategic initiatives. The Finance department verifies that all costs that are budgeted as part of the Transformation Plan are not double counted in individual CC budgets and consolidates all budgets into an organizational view.

The budgeting process at E-Comm has been enhanced over the last few years. Budgets are now set based on call volume projections and other quantitative metrics that impact staffing levels and costs. E-Comm also highlighted the addition of enhanced challenge and debate over budgets. This includes oversight, and reasonability checks on budgets. Discussion occurs at an ELT level to ensure understanding and support for budgets prior to presentation to the Finance Committee and Board for review and approval. These changes are an improvement on previous years' budgeting processes and in line with leading practices in budgeting.

Prior to budget approvals by the Finance Committee (FC) and Board (in November), the Finance department conducts a detailed budget workshop with the FC (minutes are not taken so they could not be reviewed). The invite for this workshop is shared with all Board members. As per E-Comm, the workshop is used to gather feedback on the overall budget, proposed levy changes, and transformation initiatives. Moreover, the workshop allows for the rationale behind major updates to be discussed in more detail compared to FC or Board approval meetings. Some Directors noted that following this workshop, time allocated in the Board meeting for challenge and debate on the budget is limited, giving the appearance that Board budget approvals are a "rubber stamp".

Financial Information

- Financial Information

The shortcomings of the presentation of the 2024 budget further builds on the challenges raised in the Governance section of this report as the Board is limited in its ability to make strategic decisions due to the information it receives. This provides further example to the level and type of information provided to the Board and how it may hinder effective decision making and strategic priority setting.

E-Comm's complex and non-standard bilateral service agreements (detailed in the Contracting practices section), complicates the budgeting process further, as fluctuations in its customer base - and the lack of year-over-year certainty in that base - increase the challenge of forecasting costs over the medium-long term.

### Budget accuracy

In response to stakeholder concerns regarding E-Comm's ability to budget accurately, EY conducted an analysis of expense variances across expense categories and cost centers. Budget accuracy is crucial for effective financial management, as it directly impacts resource allocation, operational efficiency, and overall organizational stability.

EY reviewed E-Comm's expense variances separately by expense category and by cost center category (shown in Appendix G). The variance analysis excludes internal allocations, and the expenses associated with NG911. Key observations include:

- Salaries & Benefits, which account for 73% of total actual expenses from 2020-2024, exhibited inconsistent variances ranging from -5% to 4%. Given the large share that Salaries & Benefits represent of total costs, accuracy in this category is high impact. Further, it is generally considered predictable due to the existence of collective bargaining agreements that drive wage rates, early agreement in the budget cycle on FTE complements, and the lead times required for hiring staff. E-Comm's current collective agreement with CUPE 8911 will expire in December 2025. Pending renegotiations may cause uncertainty over future salary and benefits expenses and could further increase levies to funding agencies.
- Maintenance & Technology expenses were consistently over-budgeted from 2020 to 2024, with variance percentages increasing from 1% to 15%. This trend indicates a persistent and worsening issue in accurately forecasting these costs.
- Professional Fees demonstrated significant inconsistencies, with variance percentages ranging from -24% to 29%. The volatility may be due to the general lack of predictability in these expenses, and/or the timing of strategic projects in the Transformation Plan.
- The largest variances by cost center were seen in the Operations and Operations - Training cost centers categories (CC Category) and Corporate IT. These areas have also seen high growth.

It is generally expected to see some variance across cost categories and management within the overall budget; however, in 2024, there was a 6% bottom line variance with actual expenses under budget for the year. E-Comm has highlighted the reason for some of the variances, particularly in 2024, being related to delays in spending associated projects within the Transformation Plan, and reduced spending on shift differentials due to lower than budgeted call volumes.

### Comparison to leading practices

An assessment of E-Comm's budgeting and forecasting process was conducted to compare practices at E-Comm to leading practices in public sector jurisdictions and similar entities. Detailed analysis can be found in Appendix H. Key observations include:

- E-Comm shares levy guidance and gathers feedback from key stakeholders, including funding agencies in advance of budget approval. However, feedback from stakeholder sessions have indicated that the ranges provided are broad and are not a sufficient input into their own budgeting process.
- E-Comm does not prepare annual updates to its strategic plan, making it difficult to assess budgeting for transformation projects and progress against intended outcomes.
- While E-Comm does prepare longer-term forecasts, including a five-year forecast presented to the Board in April 2025, it is still in the early stages of adopting a multi-year forecasting approach and developing a detailed one-year budget in conjunction with five-year forecasts.
- E-Comm continues to utilize a cost center-based budgeting structure (i.e. using internal divisional and accounting structures) rather than transitioning to service-based budgets (i.e. a budget that is built around E-Comm services instead of E-Comm departments), which would better translate costs into levies and enhance discussions with funding agencies. Examples of jurisdictions that use service-based budgeting include the City of London, Ontario and the City of Calgary, Alberta.

In addition to these challenges, the timing of E-Comm’s budgeting processes is not in line with many local government budgeting and forecasting processes resulting in challenges for local governments to incorporate E-Comm levies. Municipalities typically finalize their budgets in the September-October timeframe for the upcoming year, which would include budgeted levy payments to E-Comm.

E-Comm strives to provide an estimated range to municipalities in advance of municipal budget cycles. However, stakeholders have indicated the accuracy of this estimate and the timing of finalization of the E-Comm budget create ongoing challenges for them. This misalignment ultimately affects municipalities’ capacity to manage resources effectively and address the needs of their communities.

Finding #6	Impact
<p>E-Comm's budgeting processes reveal shortcomings, including limited accountability and no connection between the strategic plan and the budget.</p>	<p>With no connection to a strategic plan and long-range forecasts, the ability of the Board to challenge and debate annual budgets and make informed decisions on where investments should be made is limited.</p> <p>Bottom-up budgeting and limited strategic priority setting by the Board limits accountability against the proposed budget.</p> <p>Funding agencies lack the ability to accurately budget and plan for E-Comm levy increases and understand the drivers of those increases, resulting in potential financial strain and difficulty obtaining budget approval.</p>

As part of effective budgeting, strategic priorities should be defined and incorporated into the budgeting process. When strategic priorities are integrated into the budget, decision-makers have a clearer understanding of how financial allocations support organizational objectives. This clarity facilitates informed decision-making and helps to prioritize projects and initiatives based on their alignment with strategic goals.

Furthermore, there is a need for greater transparency in the budgeting process, particularly regarding budget completion timelines and levy calculations, to better meet the expectations of funding agencies.

## Recommendations

- 6-1. Revisit the strategic planning process and financial governance practices to incorporate and align strategic priorities within budget setting.**
- Changes to the budget setting process should be implemented closely with recommendations under the strategic planning refresh, particularly recommendation 4-1 on annual strategic planning and initiative prioritization.
  - Alignment of strategic priorities within budget setting will also be better facilitated with an independent Board in place.
- 6-2. Annually present a full organizational budget to the Finance Committee for analysis and Board for approval, inclusive of key trade-off decisions that are required to manage costs.**
- E-Comm management should identify key decisions and potential impacts for the Board to engage in meaningful dialogue, ensuring that financial strategies are aligned with strategic priorities and that stakeholders are aware of the rationale behind budgetary choices. This transparency fosters accountability and enhances the Board's ability to provide effective oversight and guidance.
  - The budget presented should outline the impact of trade-off decisions that would impact levies charged (this part of the budget is already presented in current state). Creating a structured format for the presentation of this information (i.e. a repeatable template) and impact on multi-year budgets and forecasts can increase consistency and facilitate understanding of financial impacts and decision making.
- 6-3. Include levy communications formally in the stakeholder management framework to support funding agencies in understanding how costs and approved budget are translated into levies.**
- 6-4. Adjust the budgeting process to focus on services or service-based budgeting.**
- A service-based budgeting framework should incorporate clear metrics for measuring service effectiveness and efficiency.
- 6-5. Align financial forecasting processes with local government budgeting timelines.**

## Forecasting process

E-Comm prepares five-year forecasts early in the fiscal year for review and presentation to the Board. These forecasts are developed by calculating incremental changes from the previous year, incorporating input from cost-centre owners and strategic initiatives. After review and approval by the ELT, the forecasts are presented to the Board. However, stakeholders have raised concerns regarding the transparency and clarity of these financial forecasts.

The 2026-2029 forecast, included in the April 2025 Board package, contained the following information but was not presented in an easily digestible format, making it difficult for Board members to understand the financial impact of strategic activities on specific levy categories:

- **Levy outlook:** A range of percentage increases for each levy category per year.
- **Financial sustainability commentary:** Insights into the organization's financial health.

- **2026 Levy outlook:** Details on factors driving levy growth, such as revenue reductions, salaries and benefits, operating expenses, capital costs, and the transformation plan, all presented as percentage increases.

An analysis of the five-year forecasts reveals a wide range of percentage increase estimates presented to the Board. Currently, Board members see only percentage increases in levies with minimal explanation of the underlying factors. Including levy impacts in dollar amounts would provide clearer insights, allowing the Board to question specific budget allocations, such as the increase in salaries and benefits for the upcoming year. Additionally, E-Comm does not disclose the current staffing levels for each Business Line, or the changes needed. Presenting call volume forecasts, along with the required staffing adjustments and their associated costs, could enhance understanding of levy impacts. EY's analysis indicates that E-Comm's forecasts primarily account for incremental costs related to maintaining existing staff and hiring additional personnel to meet anticipated higher call volumes. However, EY did not find evidence supporting the forecasted increase in call volumes for the upcoming year, raising concerns about the justification for additional staffing. The forecasts also lack information on service levels, which help justify staffing requests. Given that salaries and benefits constitute approximately 75% of total expenses, more detailed information on these costs is essential, as they significantly influence levy increases for service users.

Finally, financial outlooks on levies presented to the Board do not include NG911, which is expected to incur an additional ~\$10 million in annual costs, from 2027 (after Provincial grant funding, which was intended to cover implementation of NG911, expires) to the end of 2029. Although E-Comm has projected the impact of NG911 out to 2028, these estimates are not included in levy forecasts presented to the Board and NG911 expense forecasts have not been developed for 2029 as there is uncertainty on future program iterations, the anticipated infrastructure refresh after the initial five-year cycle, and review and renewal of contracts (specific to NG911 for additional agencies that E-Comm is delivering NG911 on behalf of, e.g., BCEHS).

Finding #7	Impact
Five-year forecasts and levy outlooks (2025-2029) do not include estimates of all impacts each year and therefore do not provide a comprehensive picture of anticipated long-term levy growth.	<p>Incomplete forecasts impact stakeholder confidence in the information produced by E-Comm, particularly around levies, as was highlighted in the Governance section of this report.</p> <p>The absence of clear long-term cost forecasts hampers E-Comm's ability to secure stable, long-term agreements, resulting in year-to-year renewals that threaten operational stability and financial sustainability, while also eroding client satisfaction and trust in the organization.</p>

E-Comm is in progress in enhancing its five-year forecasting process and presenting the five-year forecast in combination with the detailed one-year budget. Focus should be placed on ensuring all key initiatives are included in forecasts and clearly communicated with stakeholders so that they can incorporate this information into their own long-range forecasts with some level of confidence.

## Recommendations

- 7-1. Continue to move toward accurate five-year forecasts for the Board and funding agencies to provide greater financial predictability for E-Comm and clients.**
  - This requires strong alignment with strategic priorities to ensure costs are accurately planned year-over-year.

## Contingency funds

A significant financial risk for E-Comm is the incurrence of significant incremental expenses arising from a major unforeseen event, such as a natural disaster or other major emergency. Such events are likely to trigger demand for additional labour, met through additional staff, overtime, or contract personnel which impact Operations costs.

The incurrence of material incremental expenses drives financial and organizational instability. E-Comm is currently exploring options with the Board for the creation of a stabilization reserve or contingency fund. E-Comm management has been directed to draft and present a proposed policy that outlines the specific terms of the reserve at the September 2025 Board meeting. Similar stabilization reserves are common in municipalities to provide a buffer against unexpected declines in revenue, as occurred in the early months of the recent Covid-19 pandemic when municipalities lost most of their fee revenues and required revenue stabilization. This type of fund could serve as a risk management tool and safety net, enabling the organization to respond swiftly to emergencies or unforeseen expenses without compromising its operational integrity.

<p><b>Finding #8</b></p> <p>E-Comm does not have an operational contingency fund to address unexpected and unforeseeable expenses contributing to significant year to year fluctuations in costs.</p>	<p><b>Impact</b></p> <p>This impacts E-Comm’s ability to create more reliable, stable forecasting for its clients.</p> <p>E-Comm could experience significant fluctuations in expenses year to year from extraordinary, unpredictable events impacting operational costs with no means to smooth or lessen the financial impact of this on levies.</p> <p>Without a contingency fund, E-Comm may struggle to respond effectively to emergencies, which could result in funding shortages, service interruptions, and negative impacts on stakeholders.</p>
---	--

Engagement with stakeholders highlighted a lack of trust with E-Comm’s ability to manage pools of funding and perhaps consequently, some hesitancy to create stabilization funds for E-Comm to use at its discretion. It is crucial to clearly define the purpose of the fund, establish strong governance and financial controls for its use, and commit to regular updates on its status.

## Recommendations

- 8-1. Establish a contingency or stabilization reserve with appropriate controls to smooth unexpected expenses and impacts on levies during significant, unanticipated events.**
- Develop a clear definition of what constitutes a "significant event" that would trigger the use of the stabilization reserve. This definition should include specific criteria, such as the nature of the event (e.g., natural disasters, major emergencies) and the expected financial impact.
  - Create comprehensive guidelines outlining how the reserve can be accessed and utilized. These guidelines should specify the types of expenses that qualify for funding from the reserve and the process for requesting access to the funds. Guidelines for use should be documented in a Board approved policy.

- Ensure that the use of reserve funds is restricted to operational areas where costs can be directly tied to operational impacts. This could help maintain the integrity of the reserve and ensure that funds are used effectively.

## Expense management

Through interviews, numerous stakeholders have expressed concerns about the growth in E-Comm’s expenses over the past five years and the impact that this has had on levies (as levies are a recovery of costs). This analysis is limited to expense management given that Operations, the focus of our review, does not incur capital costs.

Historical growth in expenses, as below, shows the total expenses growing at a Compound Annual Growth Rate (CAGR) of 14.3% from 2020 to 2024.

- NG911 expenses, although included in the expense growth data shown, are not currently funded through levies as a provincial government grant supports the project’s implementation. Excluding the impacts of NG911, expense growth would have had a CAGR of 12.2% from 2020 to 2024, and expenses would have totalled \$128.1M in 2024.

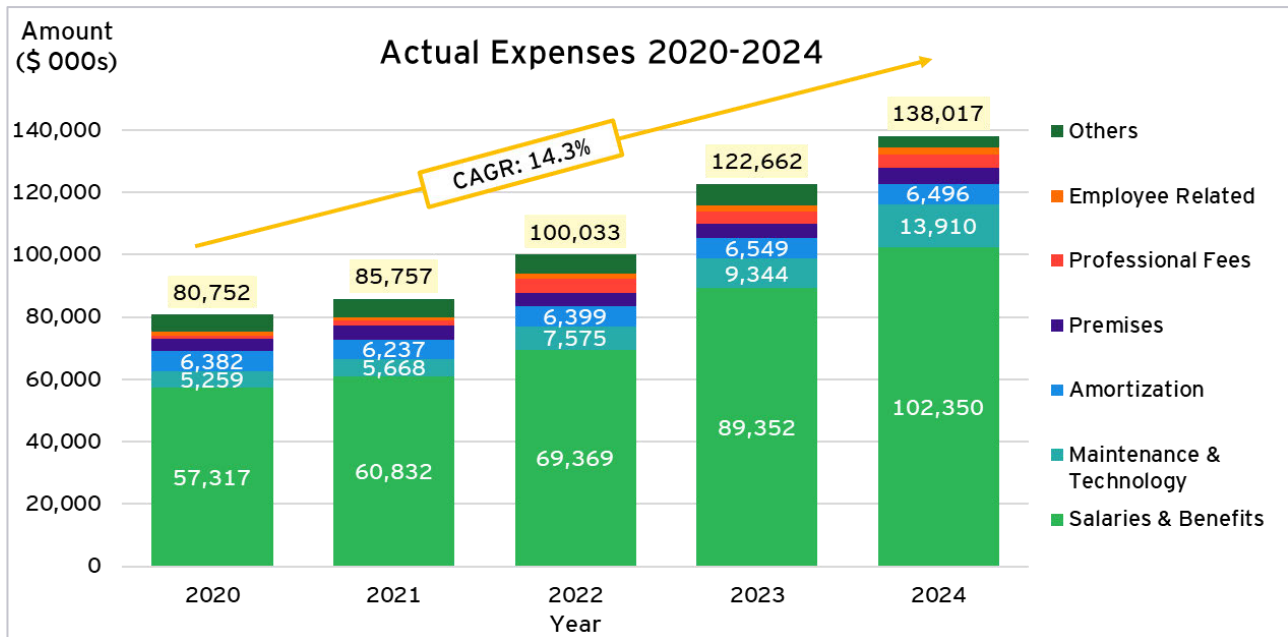


Figure 17: E-Comm actual annual expenses by expense line item 2020 to 2024 (Source: EY based on E-Comm data)

To assess the extent of expense growth at E-Comm, actual expense increases were compared to macroeconomic indicators, excluding the impacts of NG911. This analysis highlights that E-Comm's expense growth has significantly outpaced key benchmarks, increasing at a rate approximately double that of BC average weekly wage (2020-2024 CAGR of 5.2%), or BC CPI (2020-2024 CAGR of 4.1%) and BC population growth (2020-2024 CAGR of 2.6%) over the past five years. Ideally, if service levels had remained constant, E-Comm's expense growth should have aligned more closely with these indicators.

- Given the rising costs year-over-year, BC CPI and Average wage growth serve as reasonable proxies for wage increases and administrative expenses incurred by E-Comm. Similarly, BC population growth can indicate potential call volume growth, assuming factors such as average call volume per person and call handler efficiency remain stable. Maintaining consistent service levels amidst increasing call volumes would naturally lead to higher costs due to the need for additional resources, overtime for existing staff, and increased maintenance and technology expenses.

- Had E-Comm constrained expense growth to align with inflation and population growth, projected expenses for 2024 would have been approximately \$104 million, approximately 19% lower than the actual expenses incurred (excluding NG911).

While service levels have improved over the past two years, EY was unable to evaluate a cost per call or the efficiency of the incremental expenses incurred to achieve these improvements due to challenges with the existing cost allocation methodology and current financial management practices at E-Comm. Additionally, call volume changes due to change in services provided to clients (e.g. emergency and non-emergency call taking), changing demographics, and onboarding of new clients such as North Vancouver in 2024 (accounting for 4.4% of total Police emergency calls and 1.8% of total Police non-emergency calls in 2024) could not be directly tied to specific cost increases.

Additional details on expense growth can be found in Appendix I.

### Budgeted FTE

Salaries and benefits account for an increasing share of total expenses, rising from 71% in 2020 to 74% in 2024, with a CAGR of 15.6%. This suggests that personnel costs are a major driver of overall expense growth (detailed in Appendix I).

Analysis was limited to budgeted FTE (as opposed to year-over-year actual FTE counts) as E-Comm does not have historical FTE counts or FTE actuals against historical budgets (total or by cost center/Business Line). This limited EY’s ability to conduct a comparison of budgeted vs. actual FTEs to assess budget accuracy in this area.

Budgeted FTE within cost center categories (CC Categories) are shown in Figure 18 from 2020-2024. Budgeted FTE after direct allocations is shown below as it ties to the expense data presented (Note: cost centers were grouped into categories for the purposes of this analysis).

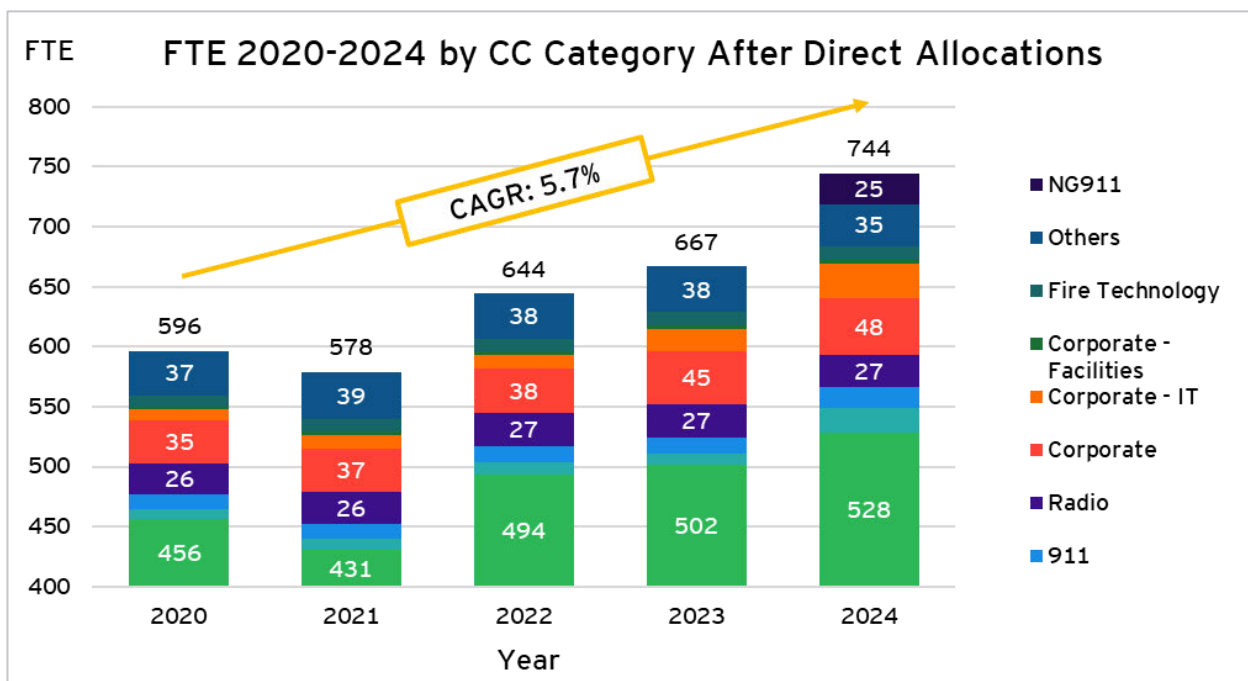


Figure 18: 2020-2024 Budgeted FTE by CC Category after direct allocations (Source: EY based on E-Comm data)

The growth in average actual salaries and benefits, per budgeted FTE exceeded the growth in the BC average weekly wage over the same period. This indicates that E-Comm’s compensation per employee outpaced that of the general wage trends in the area. Contributing to this increased cost per FTE is hiring of more skilled employees in certain areas such as data analytics, IT support and GIS, and cybersecurity.

The average actual salaries and benefits expense per budgeted FTE grew at a CAGR of 9.4% from 2020 to 2024. This growth is approximately 80% higher than the 5.2% CAGR of BC's average weekly wage rates from 2020 to 2024.

	Amounts by Year					CAGR 2020 - 2024
	2020	2021	2022	2023	2024	
Total salaries and benefits cost (\$ '000s)	57,317	60,832	69,369	89,352	102,350	15.6%
Budgeted FTE	596.30	578.40	644.12	666.70	743.96	5.7%
Salaries and benefits cost per budgeted FTE (\$/FTE)	96,121	105,173	107,695	134,022	137,574	9.4%
BC average weekly wage rate (\$)	1,093	1,139	1,194	1,270	1,337	5.2%

**Table 4: 2020-2024 Salaries and Benefit expenses per Budgeted FTE (Source: EY based on E-Comm data, BC Stats Labour Force Survey (LFS) Earnings and Employment Trends Monthly Data Tables)**

<b>Finding #9</b>	<b>Impact</b>
There is limited accountability for expense management as there is limited budget to actual reporting.	The absence of historical budget to actual FTE data limits E-Comms ability to report on variances in this area.  Overall, limited expense reporting against budget prevents strategic spending oversight by the and limited accountability to clients to maintain the budget proposed (which also impacts levies).

### Recommendations

- 9-1. Enhance expense management practices and reporting to include ongoing expense tracking, budget variances and forecasting that track progress and variances against strategic priorities.**
- Consider quarterly presentations to the Board, providing updates on expense management, budget performance, and significant variances. Ensure the Board understands the drivers of variances and obtain sign-off on variances from the Board.
  - Consider creating a financial reporting dashboard to summarize key financial metrics which would enable quick assessments of the organization's financial health.

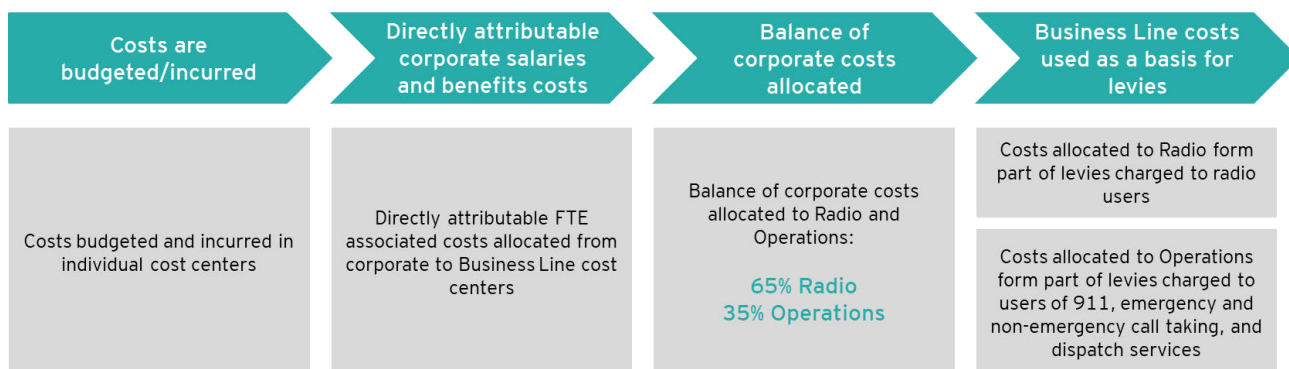
## Corporate cost allocation

E-Comm's corporate cost allocation model is important as a considerable amount of the levies charged to funding agencies is comprised of corporate costs in addition to the direct operational costs incurred.

Direct Business Line costs are recorded by cost center as they are incurred (or budgeted). Where appropriate, direct FTE-related expenses may be allocated from the CC in which they are recorded to the appropriate cost center or Business line (e.g. 911 call takers), not shown in the process flow below. Corporate costs (at 16.5% of total organizational costs in 2024) need to be allocated to front-line business

cost centers before allocating costs into Business Lines so that they can be recovered from funding agencies through levies.

Figure 19 below shows the corporate cost allocation process at a high level.



**Figure 19: High-level corporate cost allocation process (Step 2 of Figure 15)**

Costs are incurred or budgeted for in individual cost centers by expense line to form a matrix of costs by line-item type and cost center (e.g. salaries and benefits expenses in Human Resources cost center).

Corporate cost assignment and allocation is currently performed in two steps:

- A portion of salaries and benefits is assigned directly to a Business Line if it is known how staff consistently spend their time; specifically, these expenses are assigned to the appropriate front-line business cost center (i.e. salaries and benefits expenses within 911 Operations cost center). Identifying corporate FTE that directly support the Operations Business Lines and processing salaries and benefits expense assignments for these FTE is a manual process. *Note: this manual process step is removed as part of the proposed new financial model as detailed in Appendix J.*
- The balance of corporate salaries and benefit expenses and all other corporate costs are allocated via an “internal allocations” expense line item with 65:35 ratio to Radio and Operations. Within Operations these allocated corporate expenses, along with direct business line expenses form the total Operations costs which then need to be split by Business Line to be recovered through levies. The methodology for this split into Business Lines is undocumented. Using management judgement, expenses are first allocated to Fire and PSAP Operations Business Lines with the balance assigned to ECVI Police and ECLMD Police.

The resulting operating expenses and capital costs in Business Lines are the amounts that are recovered from funding agencies in the form of levies.

E-Comm has highlighted and acknowledged some challenges, limitations, and/or inequities of the existing model, including:

- It requires significant manual effort from E-Comm to process corporate salaries and benefits assignments to Business Lines to try to make the allocation more equitable across funding agencies.
- Remaining corporate costs are allocated to two Business Lines (Radio and Operations), rather than all Business Lines (including Fire CAD, Fire RMS, etc.). This is inequitable to the Radio Business Line as it receives 65% of the remaining corporate costs, a proportion that dates to approval of the 2010 budget and is believed to be significantly greater than the share of corporate resources supporting the Line. Within Operations, the corporate costs are allocated to a combined Operations cost pool and not directly to a Business Line (e.g. 911, Fire Dispatch, or ECVI Police).

<p><b>Finding #10</b></p> <p>Corporate expenses are not allocated in a manner that reflects the drivers or consumption of those costs resulting in inequitable distribution of costs across funding agencies.</p>	<p><b>Impact</b></p> <p>Business Line expenses are used as the basis for calculating levies. If a Business Line is over or under-charged for corporate costs, the sum of all associated levies charged for that Business Line would reflect an excessive or deficient portion of corporate expenses.</p>
---	--

To address some of the challenges with the existing financial model, including the corporate cost allocation model, E-Comm is proposing a new financial model that aims to more accurately assign and track costs to Business Lines as well as create a driver-based approach to recover those costs through levies. The new financial model is comprised of two key elements, a costing model, and a pricing model. Below we have detailed how effective the cost model is at addressing the above noted challenges. A full analysis of the new financial model can be found in Appendix J.

Currently, there is direct assignment of some corporate staffing costs (where a clear service relationship exists with a Business Line), in advance of corporate cost allocations. This process is eliminated within the new financial model, due to its manual intensity resulting in a step back in traceability of costs. The current assignment of corporate staffing costs, prior to general corporate cost allocation provides a more accurate representation of costs by Business Line than a general allocation methodology would.

There is currently a 65:35 split of corporate costs allocated to Radio and Operations based on a Board approved decision in 2009. In the new model all corporate expense categories have been allocated using a single methodology. There is no evidence of analysis on whether there may be a more appropriate methodology to assign by expense category. Additionally, the model only allows for a single allocation driver to be used across all corporate expense lines. E-Comm is leveraging a simple allocation methodology but does not enable clarity into what expense are being incurred to deliver a service. This likely will not enhance cost traceability.

Finally, cost centers currently do not align to Business Lines requiring allocations. The new costing model aims for more granular Business Lines (i.e. ECLMD Police would be split out into 911, ER, NER, and CPIC); the process to assign direct costs remains the same. The addition of more granular cost centers provides the opportunity for better tracking of financial information provided the expenses recorded are directly related to how they are incurred (and not just an allocation to the cost centers).

<p><b>Finding #11</b></p> <p>While the current method directly assigning some corporate costs to Business Lines offers more visibility of costs to deliver a Business Line than a general allocation, the proposed new financial model prioritizes efficiency over precision in removing this step.</p>	<p><b>Impact</b></p> <p>The direct assignment of costs supports in deriving a clearer picture of the direct costs to deliver a service and reduces the total corporate cost pool that follows a general allocation methodology.</p> <p>If Business Line costs increase or decrease because of these direct assignments of corporate salaries and benefits costs, this can be explained by E-Comm and there is the potential for visibility into the drivers of costs for stakeholders. Removing this direct assignment step reduces the ability of E-Comm to explain drivers of levy growth as they relate to a specific Business Line or service.</p>
---	--

## Recommendations

### 11-1. Align corporate costs directly to service delivery and the respective Business Lines to enhance financial accountability and transparency.

- Review the existing costing model to identify limitations and areas for improvement regarding cost allocation drivers. This would require identification of potential drivers for different expense line items. For example, building related costs could be allocated based on amount of space used by each Business Line or the number of FTE supporting each Business Line.
- Incorporate more specific allocation drivers tailored to each Business Line into corporate cost allocation. This could include a single driver per line item or a combination of drivers including a percentage weighting for each.
- Conduct a thorough review of corporate costs to identify expenses that are directly related to the delivery of services within each Business Line. This could include training costs associated with FTE directly supporting a Business Line or service, or legal services that are provided directly in support of a specific service. For example, if \$0.5M in dedicated training is delivered to ECVI Police and that expense is captured in a corporate cost centre, it should be directly charged to ECVI Police prior to the corporate cost allocation methodology.
- Create protocols for directly assigning identified costs to the relevant Business Lines before applying any corporate cost allocation methodology to align where costs are incurred in support of a service or Business Line.
- Financial management software can be used to track and record direct costs associated with each Business Line, ensuring accurate data entry and reporting and reducing manual effort to track these items on an ongoing basis.
- Establish a regular review process to assess the effectiveness of direct cost assignments and adjust as necessary to improve accuracy and accountability.

### 11-2. Enhance transparency in stakeholder reporting by including costs associated with the direct consumption of services.

- Following updates to the costing model per recommendation 11-1 above, identify opportunities to improve reporting, particularly to funding agencies, to link direct costs for service delivery and the drivers of those costs to the levies charged.
- Reports should include detailed breakdowns of direct costs assigned to each Business Line, alongside levy calculations, to provide stakeholders with a complete financial picture. There should be a regular reporting schedule to provide stakeholders with timely updates on costs and levies, fostering transparency and accountability.
- Solicit feedback from stakeholders on the new reporting format to continuously improve clarity and relevance, ensuring that the reports meet their informational needs.

## Translating costs into levies

The previous section highlighted some of the challenges of the cost allocation model that are used to arrive at front-line cost center expenses. This section describes the process used to set levies for each funding agency by Business Line and the challenges in tracing how expenses are translated from cost centers to levies, particularly in the Operations category.

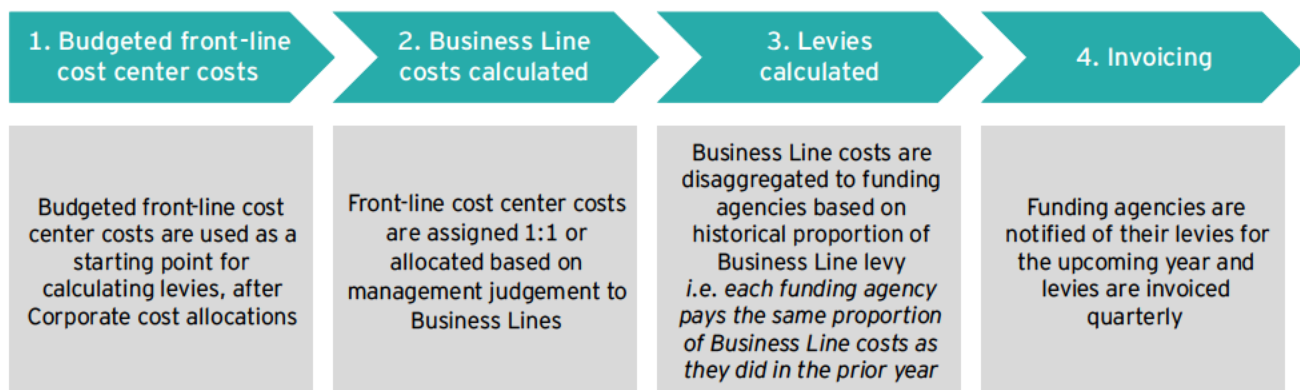


Figure 20: High-level levy setting process (Step 3 and 4 of Figure 15)

As noted, Business Lines are not always a 1:1 match to cost centers. To allocate front-line costs from cost centers to Business Lines, costs are assigned where a direct relationship exists (e.g. FTE working on 911 call taking), with the balance being assigned to Business Lines based on management judgement; this is particularly the case in Operations (as outlined in Figure 21 below). Many of these calculations are manual and are not documented or system driven, increasing the work-effort and reducing traceability of costs.

Levies for each funding agency are then calculated within each Business Line. Historical proportions are used for allocating Business Line costs to funding agencies as part of the levy calculations (i.e. each funding agency pays the same proportion of costs as they did in the prior year), leading to potential inequities and challenges in tracking actual service costs. Funding agencies are notified of levies for the upcoming year following Board approval of budgets in November. Levies are invoiced on a quarterly basis and revenue is recognized by E-Comm monthly. An overview of levy growth year-over-year is presented in Appendix K.

Business Line cost centers			Business Line	Levy type	
500- Operations - Dispatch Floor	520 - Operations - Training	515 - 9-1-1 PSAP	911 PSAP	911 Call Taking Levy	
		511- 9-1-1 Operations			
				ECLMD Police	Dispatch Levy
				Fire Dispatch	
		ECVI Police	Dispatch Facility & Related Levy		
		530 - Operations - South Island Dispatch			

Figure 21: Cost centers, Business Lines, and levy type (before assignment of costs to Business Lines)

Historical levy build-up continues to present equity challenges as the proportion of total Business Line costs recovered from a funding agency has not been updated since onboarding service users. For example, an increase in costs to deliver services with one agency is allocated so that each funding agency pays the same proportion of costs as they did in the prior year. It does not reflect actual consumption of resources to deliver a service to a particular service user.

Given the challenges with the current pricing structure and cost management, disaggregating Business Lines further into more granular services (e.g. ER and NER) is a key consideration of the new financial model.

<p><b>Finding #12</b></p> <p>There is limited traceability of costs for both translating cost centers to levies and identifying the cost to deliver services. This is partially due to E-Comms use of a</p>	<p><b>Impact</b></p> <p>When levies change due to increased expenses in cost centers (corporate or front-line), it is difficult to explain</p>
---	--

<p>historical allocation basis for charging funding agencies levies.</p>	<p>exactly why levies by Business Line and funding partner are changing.</p> <p>Some funding agencies may be over-charged and others under-charged should actual consumption of services received, and service levels achieved differ materially from historical levels.</p>
--	--

In the proposed new financial model, the allocation to funding agencies is driven by demand factors (e.g. call volumes within each municipality - costs allocated by percentage of overall calls - based on historical average volume). This improves the existing cost recovery model by creating greater linkages between consumption of services and levies. The drivers selected are defensible and will reflect changing consumption patterns over time.

There is currently limited traceability of costs incurred to levies charged. The new model attempts to align cost centers to Business Lines more directly and at a more granular level. Beyond the challenges noted with corporate cost allocation, the new pricing model provides a clear and defensible basis for allocating Business Line cost into levies for each funding agency.

E-Comm does not have the ability to price for differing service levels or services provided to service users based on the way costs are recorded and allocated. This same problem exists for the delivery of different services within a Business Line (e.g. ER vs NER) and limits E-Comm’s ability to equitably recover costs. The proposed new financial model does not consider service levels in its calculations or allocations. In this area there has been no significant change in the model to enable direct pricing for different service level expectations.

**Recommendations**

**12-1. E-Comm should consider implementing pricing strategies to support alignment between services provided and cost to deliver.**

- This should be considered closely with recommendation 15-1 and 16-1 on standardizing service definitions and setting provincial service standards.
- Develop a clear policy for implementing additional charges for non-standard services (if E-comm decides to offer non-standard services), ensuring that these charges are justified and communicated effectively to stakeholders.
- Revise financial reporting processes to reflect costs associated with each service tier and the corresponding pricing structure, to create greater alignment between services, pricing, and the impacts on levies through enhanced financial processes and reporting. This could include creation of standardized templates, scheduling of regular reviews with stakeholders, and establishment of a feedback mechanism for stakeholders to provide input on financial reports.

## Capital funding

E-Comm’s capital expenditures are historically funded through Radio levies, a practice rooted in past processes and historical understanding of the Members’ Agreement. E-Comm has the option to secure loans from the Municipal Financing Authority (MFA) for significant capital projects, with interest costs also covered by Radio levies. E-Comm is increasingly shifting to a model where capital costs are being recovered (through amortization) from the Business Lines that derive benefit from the capital cost.

Within the Radio model, there is a requirement to complete a detailed annual true-up of costs relating to providing radio services, preventing the carry-forward of capital funding and necessitating annual budgeting on a cash basis.

Within Operations, E-Comm has started recovering the cost of capital through an amortization expense over the life of the capital asset. The budgeted amortization is calculated based on the anticipated capital portfolio and charged as levies. Any variances in the capital portfolio vs the budget would result in a surplus or deficit for the year as the actual amortization charge would vary from budget. This would result in E-Comm either over or under- charging for capital in a single year, however, would likely offset future years’ amortization charges. To pay for any capital assets up front, E-Comm is required to either raise financing through the MFA or utilize internal cash balances. No dedicated capital reserve exists for the Operations businesses to fund capital programs.

In response to these challenges, E-Comm is exploring several opportunities, including:

- Implementing a carry forward policy and process to set aside any budgeted (and funded) but unspent capital costs.
- Establishing a capital reserve fund to hold any un-spent capital costs (typically for a short period) and to build up funds for larger planned capital expenses (such as ECC3) allowing funding parties and E-Comm to spread cash flows over multiple years with appropriate capital planning.

Adequate capital funding is essential for E-Comm to maintain and upgrade its systems, respond to evolving service demands, and implement strategic initiatives. A key component of efficient capital planning is a comprehensive strategic plan to guide investment decisions. Without sufficient capital, E-Comm risks financial strain, which could lead to delays in project timelines, diminished service quality, and an inability to meet the needs of its clients and stakeholders.

Finding #13	Impact
<p>Managing capital funding is challenging and highlights vulnerabilities in financial sustainability due to the absence of a capital asset fund, a historical reliance on radio levies to fund capital costs, and the inability to carry forward capital funding year over year.</p>	<p>E-Comm may struggle to invest in necessary infrastructure for essential services due to funding structure, potentially jeopardizing long-term operational viability without the ability to plan for capital over a long-time period.</p> <p>Radio service users historically have paid for capital expenditures that do not directly support the services that they receive, and this is likely considered inequitable.</p> <p>The inability to carry forward capital funding could encourage sub-optimal spending as the funds must be used by year-end or lead to a loss of transparency and accuracy in financial reporting if funds are used to offset operating overruns.</p>

**Recommendations**

**13-1. Create a capital reserve fund specifically for Operations to support adequate funding for capital projects and enhance financial planning and sustainability.**

- Evaluate the current and future capital needs of Operations to determine the appropriate size and scope of the capital reserve fund. Outline the structure of the capital reserve fund,

including how funds will be allocated, managed, and accessed for capital projects (including key controls and approvals required).

- Establish clear financial policies and guidelines for the duration over which capital costs will be charged, ensuring alignment with the expected lifespan of each investment. This could be the amortization policy aligning to how E-Comm is currently starting to recover capital costs from Operations business lines.

**13-2. Consider including funding for the capital reserve (more than amortization expenses) in annual levies to support financial sustainability and to smooth the impact of capital expenditure over time.**

- Conduct an analysis to determine the appropriate level of funding required for the capital reserve, considering projected capital expenses and operational needs. This should not dramatically impact levies, but rather smooth the financial burden of larger projects over time creating greater stability in levy amounts.

## Operations

E-Comm must remain responsive to uncertainty posed by the external environment. Significant events which have recently impacted E-Comm's operations include staffing issues exacerbated by COVID-19, call surges due to the lower provincial heat dome, atmospheric river events, Android cell phone technological issues, and the worsening toxic drug crisis. As a result, call takers and dispatchers faced significant pressure, leading to increased overtime and higher stress levels.

The operational stream of this review evaluated the efficiency and effectiveness of E-Comm's operational performance, with consideration to the challenges faced in the external environment. The Operations section of this report includes findings, analysis and recommendations in the following four thematic areas:

- Service metrics and targets
- Contracting practices
- Operational resilience, and
- Culture and workforce.

## Service metrics and targets

Service levels have improved in the past two years, with this being recognized and noted by E-Comm's clients in interviews. E-Comm publicly reports its call answering service level for 911, police emergency, police non-emergency, and fire emergency calls monthly. The reporting for 911 calls is accessible on its website, while service levels for other categories can be found in the semi-annual transformation progress updates report.

E-Comm also provides regular updates on service level performance to its clients through monthly reports and dashboards. Overall, clients generally agreed E-Comm has recently been effective in its reporting of service levels as well as current performance against targets. Ongoing concerns regarding rising operating costs and increased levies associated with service level improvements has led some stakeholders to question whether the current service level targets are appropriate.

### Service metrics

E-Comm has enhanced its capability to track operational data with the introduction of a Data and Analytics team in 2023. It has started reporting operational metrics (such as call abandoned rate, call handling time, and callback time) to police agencies through self-serve dashboards; agencies now have access to their own dashboards. This development represents a significant step in improving transparency and visibility into operational performance. It is anticipated that fire agencies will also gain access to metrics dashboards by August or September 2025.

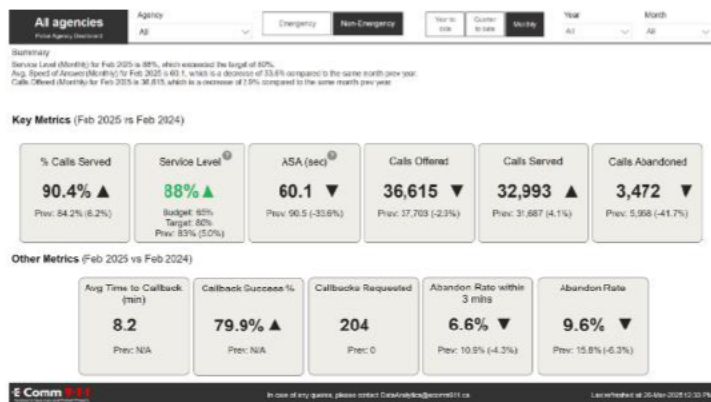


Figure 22: Example of police dashboard

During stakeholder engagement, clients expressed that the lack of clear reference points makes it challenging to assess true performance. The current service level reporting includes the speed of call answering, lacking insights into the overall quality of call-taking and dispatch services. There is a desire for more comprehensive metrics that incorporate service quality, such as the number of complaints received, to provide a clearer picture of E-Comm's operational effectiveness.

Currently, E-Comm does not have a formal quality audit process in place; however, quality reviews are conducted for new hires during their probation period, and call reviews are performed reactively in response to complaints or following major fire incidents. E-Comm has acknowledged the limitations of its existing quality assurance measures and is in the process of implementing a new quality management framework to standardize service quality. Developing performance metrics related to quality is part of this initiative. The timeline for establishing standardized quality metrics and data collection is set to begin in September this year, with a pilot phase planned for the first quarter of 2026. Reporting on service quality will initially focus on call-taking operations, followed by dispatch services.

<p><b>Finding #14</b></p> <p>Service level performance and reporting have significantly improved in the past three years and is currently meeting client expectations. However, there is currently no defined performance benchmark, so reporting is limited to historical comparisons.</p>	<p><b>Impact</b></p> <p>This has resulted in a starting point to rebuild trust with stakeholders and has also resulted in a re-focus on financial sustainability and a discussion regarding the balance of service level targets and fiscal responsibility.</p> <p>The inability to assess true performance due to unclear reference points and the absence of quality measurement undermines E-Comm's accountability to stakeholders and diminishes confidence in its operational effectiveness, potentially affecting client satisfaction and trust.</p>
---	--

## Recommendations

**14-1. Develop a benchmarking framework that incorporates industry standards, leading practices from other jurisdictions and client expectations for key metrics, while implementing a process for regular review of metrics and benchmarks. Service quality metrics should be incorporated as key metrics.**

- Create a benchmarking framework that incorporates industry standards (such as National Emergency Number Association (NENA) and the Association of Public Safety Communications Officials (APCO)) and leading practices from other jurisdictions for key metrics. This framework can evolve over time to include E-Comm's historical performance once sufficient data is available. For metrics that no reference or benchmarking data is available, E-Comm can set a desired target based on internal historical performance and stakeholder expectation and refine it over time as more data becomes available.
- Measure and provide clients with service quality results by conducting regular quality audits for call-taking and dispatch services. Establish clear methodologies for collecting data during audits, which may involve direct observation of call-taking and dispatch processes, reviewing recorded calls to evaluate service quality.

**14-2. Service quality metrics should be used for continuous improvement in call-taking and dispatch services, including non-emergency calls.**

- Define clear quality standards for call-taking and dispatch services. This should include acceptable performance levels for each quality metric, such as target resolution times for issues or complaints, and specific metrics for non-emergency calls, such as user satisfaction percentages and average resolution times. Regularly review these standards to identify trends and areas for improvement.
- For non-emergency calls, consider implementing follow-up surveys to assess user satisfaction and gather feedback on service quality. Drawing inspiration from the New Zealand Police, consider evaluating non-emergency calls based on the percentage of users who are satisfied with the service, ensuring that feedback is collected systematically. Analyze this feedback to inform training and development initiatives.

## Service targets

E-Comm's service level target for fire emergency call answering is based on the National Fire Protection Association (NFPA) 1225 standard, chosen because it is widely used by fire dispatch services across North America. However, the targets for other service levels do not align with industry standards or targets from other jurisdictions. For example,

- E-Comm's target for police emergency calls is established at 88% within 10 seconds, which does not align with the National Emergency Number Association (NENA) standard of 90% within 15 seconds. E-Comm initially started with 90% within 10 seconds but reduced it to 88% about 15 years ago to mitigate staffing cost increases.
- For police non-emergency call targets, the methodology on targets is not well-documented. E-Comm plans to discuss defined metrics and targets with police agencies in future.

Different jurisdictions have established varying benchmarks (outlined in Table 5 below). E-Comm's target aligns with those in the UK, positioning it at the higher end of service targets across comparators. Aligning the current targets with those of other jurisdictions, while balancing fiscal responsibilities and stakeholder expectations, could improve service delivery and strengthen stakeholder trust.

It is important to note that other PSAPs in the province may follow different service level targets, and the performance of secondary PSAPs in call answering impact E-Comm’s efficiency in responding to 911 calls. This presents an opportunity to establish province-wide standards that facilitate consistency and alignment of service level targets across the emergency communications system.

Call type	Call answering service level target	Examples of industry standard or other jurisdictions
911	95% within 5s	Alberta: 95% in 15s Quebec: 90% in 10s Australia: 85% in 5s & 95% in 10s UK: 95% in 5s New Zealand: 85% in 15s NENA: 90% within 15s & 95% within 20s
Police Emergency	88% % within 10s	Alberta: 95% in 15s Quebec: 90% in 10s Australia (Triple Zero Victoria): 80% in 5s/95% in 60s New Zealand Police: 90% in 10s NENA: 90% within 15s & 95% within 20s
Police Non-Emergency	80% within 180s	No references found to date
Fire Emergency	90% within 15s	NFPA: 90% within 15s & 95% within 20s

**Table 5: E-Comm’s call answering service level targets**

<p><b>Finding #15</b></p> <p>The rationale behind current service level targets is unclear and not well documented; alignment of targets with industry standards and other jurisdictions is inconsistent.</p>	<p><b>Impact</b></p> <p>The lack of well-defined and appropriately set service level targets can compromise public safety, client, and caller satisfaction.</p> <p>These types of discussions open the lines of communication between E-Comm and its clients allowing it to become more responsive to client needs.</p> <p>Reducing service level targets presents the opportunity to reduce costs. It is important that E-Comm understand cost traceability to determine potential financial impact.</p>
---	---

With the transition to NG911, there is a potential that E-Comm will receive multimedia communications, including text, images and videos, in addition to traditional voice calls. With this shift, current service level metrics may become inadequate.

**Recommendations**

- 15-1. Reassess current service level targets to determine if they appropriately balance client needs, cost-effectiveness and alignment with industry standards. Document the approved targets and establish a cadence for regular reassessment.**

- Gather benchmark data from recognized sources, such as the National Emergency Number Association (NENA) and other jurisdictions like Quebec and Alberta.
- Identify gaps in E-Comm's targets based on benchmark comparisons and client feedback and explore best practices from other jurisdictions that could enhance service delivery and cost impacts.
- Clearly document the methodology used for setting these targets, including the rationale for any proposed changes.
- Implement a regular review schedule for service level targets to keep them aligned with industry standards and client expectations. Promote frequent stakeholder engagement to continuously gather feedback and make necessary adjustments.
- In the review process, adapt metrics and targets to align with the evolving landscape of emergency communications, particularly with the transition to NG911 and the introduction of multimedia (e.g., text, images, videos). This includes identifying potential gaps in existing metrics that may not adequately capture performance in this new context.
- It would be helpful for the Province to support E-Comm and other BC primary PSAPs in defining service levels. Some ways the Province could do this include:
  - Introducing formal service level requirements that require all PSAPs to meet minimum levels through provincial regulation, policy directive or ministerial guidelines.
  - Linking provincial funding or capital grants to the achievement of specific service levels.
  - Fostering collaboration and alignment of local governments across the province to achieve consensus.

## Contracting practices

E-Comm provides services to a wide range of service users, and through this manages 76 separate, non-standard agreements, which includes 14 for 911 call-taking, 4 for 911 call-taking and police dispatch combined, 22 for police call-taking and dispatch, 11 for fire call-taking and dispatch services, 13 for Fire CAD, and 12 for Fire RMS.

Not all operational services clients have fully executed agreements with E-Comm, as some clients have not agreed to sign. In certain cases, even when negotiations have not reached a consensus, E-Comm continues to provide services due to the critical nature of these services and the associated public safety implications. Existing contracts are not standardized and do not clearly detail the services offered. This absence of standardization arises from the varying dispatch service requirements of different clients, with some needing more extensive service offerings than others. Without clear, standardized agreements and service offerings, E-Comm is left to manage bespoke client agreements and bespoke services. This requires additional time from operational staff, operational management and training staff, and corporate staff responsible for managing contracts. This also reduces the economies of scale and efficiencies that could be offered through an organization like E-Comm serving most of the Province.

Table 6 provides a point-in-time overview of contract status, categorized by type of service. A significant number of clients currently operate without formal agreements, or their existing agreements have expired, with only 35 fully executed agreements. Notably, among those contracting parties without formal agreements, most are also E-Comm's members/shareholders. The Members' Agreement does not contain any clause that explicitly grants access to PSAP services or provide detailed descriptions of the call-taking and dispatch services provided.

Service type	Active	Expired but not yet renewed	Agreement in progress (new client)	No formal service agreement established
911 call-taking	5	8	1	0
911 call-taking and police dispatch combined	4	0	0	0
Police call-taking and dispatch	14	3	0	5
Fire call-taking and dispatch	0	4	0	7
Fire CAD	0	4	1	8
Fire RMS	12	0	0	0

**Table 6: Overview of service agreement status**

Clients reported it was unclear how services relate to levies and the agreements provide no traceability or clarity (as noted throughout the Finance section of this report). For instance, if a client removes non-emergency call answering and chooses to in-source that service themselves, their levy may not change based on how the financial model is structured and levies are calculated. The lack of clear, standardized agreement and service offering, as well as limited traceability in pricing, leads to confusion regarding operational procedures, inefficiencies and potential errors in service delivery.

E-Comm currently lacks adequate account management resources and mechanisms to effectively manage client relationships and support client concerns. While clients often learn whom to contact based on established relationships, this approach can be problematic due to frequent personnel reassignments within agencies, which disrupts existing connections. Client feedback is typically gathered through ad-hoc interactions and quarterly meetings of operational committees, but these methods do not comprehensively address all client needs.

Collaboration with police agencies on streamlining call-handling procedures has recently occurred outside of agreements to reduce the number of call-handling standard operating procedures from 1,536 to 96. This has simplified processes and enhanced training efficiency. The lessons learned from this achievement could be applied to standardizing contracts and service offerings, supporting improvements in operational efficiency and clearer expectations for E-Comm and its clients.

<p><b>Finding #16</b></p> <p>E-Comm's finance practices are unable to price services accurately leading to the absence of established cost-per-service formulas, absence of service or contract standardization, and unclear expectations. A significant number of clients also operate without formal agreements or with expired contracts.</p>	<p><b>Impact</b></p> <p>The absence of clear and standardized agreements results in confusion among clients regarding service scope and costs, difficulty for E-Comm management to deliver, measure and report against expectations, increased demands on E-Comm's resources, and potential errors in service delivery, ultimately undermining accountability and the effectiveness of partnerships as well as lost efficiencies in delivery.</p>
--	---

Many clients feel uncertain about pricing and are unable to extend agreements for longer terms due to E-Comm's inability to provide cost forecasting.

E-Comm has attempted to establish formal service agreements with all clients and standardize contract terms; however, E-Comm reported several challenges with the process. In some instances, clients prefer not to enter binding agreements, and since E-Comm continues to provide services and receive payment without agreements in place, there is little urgency to finalize them. Furthermore, the diverse dispatch service requests from different communities hinders the establishment of standardized agreements, and E-Comm's inability to price services directly based on consumption complicates these efforts. There is also a prevailing preference for customized contracts, with clients often negotiating all details.

The transition to NG911 presents an opportunity to revisit and renew agreements, particularly those signed annually, as existing agreements do not incorporate the requirements necessary for NG911. Nonetheless, significant barriers to standardization persist.

To address these challenges, E-Comm is planning to implement a contract management system in Summer of 2025. This system aims to improve the management of both client and vendor contracts by providing a centralized platform for tracking contract terms and monitoring compliance, thereby helping E-Comm mitigate risks associated with missed deadlines and obligations. A vendor has been selected, and preparations for implementation are currently underway, with progress on track.

## Recommendations

**16-1. Create a standardized service catalogue with definitions of services offered by E-Comm. This should include detailed descriptions each service and the associated pricing structures by service and be completed in conjunction with improvements to the new financial model.**

- Establish a pricing structure based on a transparent, formula-based model that reflects the true cost of service delivery. Pricing adjustments should follow a scheduled, organization-wide process (e.g., annually) to avoid ad hoc changes, ensuring clients can anticipate costs and budget accordingly.

**16-2. Develop and implement formal standardized agreements with all operational clients to clearly outline the scope of services provided.**

- E-Comm should engage with the Province to determine the nature and extent of support they could provide to collaborate with municipalities towards adoption of standardized agreements, as some municipalities have opted not to sign.
- This recommendation has previously been explored by E-Comm but was constrained by the absence of standardized pricing and a service catalogue.
- Differences in legal capacity among clients, particularly between larger and smaller communities, have also contributed to variation in contracting outcomes.

## Operational resilience

Several clients and Board members have expressed concerns about E-Comm's capability and capacity to effectively handle system outages or emergencies due to low redundancy level, previously reported immature business continuity capabilities and the risks tied to a consolidated service provider that may lead to high impact failures.

E-Comm experienced a major outage due to a cooling issue in one of its data centres in March 2024 which affected call-taking operations for several hours, during which some calls had to be rerouted to BCEHS. The executive team has acknowledged organizational weakness in resilience and business continuity and is actively implementing initiatives to enhance its capabilities in managing disruptions.

## Resilience framework

To evaluate E-Comm's capabilities and operational resilience, a resilience framework outlining key areas and assessment criteria is used to provide a structured approach to measuring E-Comm's current state of operational resilience. Details of the framework, definitions of its components, and the assessment of E-Comm against this framework are presented in Appendix L.

The analysis reveals several strengths and areas for improvement in E-Comm's resilience capabilities. E-Comm has strong technical and facility resilience, including backup power, redundant data centre, and disaster-hardened infrastructure. However, gaps in business continuity planning, insufficiently tested interagency call-routing, limited redundancy, and limited integration with province-wide emergency communications present risks to service continuity in large-scale or extended disruptions. E-Comm is one component of the broader 911 system, and effective collaboration with other partners in this ecosystem is essential for safeguarding interrupted emergency response and maintain public trust.

By comparison, in Quebec, all PSAPs are mandated to implement dual-level backup system. In case of primary backup centre is unable to process rerouted calls, an additional backup system must be readily available. In Newfoundland and Labrador, call rerouting procedures are tested annually, encompassing both manual and automated processes. E-Comm can draw insights from these practices to enhance interagency collaboration on resilience.

## Business continuity

### Financial Information

Multiple interviewees, both on the Board and ELT, flagged E-Comm's lack of robust business continuity capabilities as a significant concern. It was noted that E-Comm's size and complexity hinder the establishment of a fully redundant back up system, particularly with the added complexity of NG911 transition.

E-Comm has since established a project focused on business continuity planning, aiming to improve its ability to respond to disasters and emergencies, thereby enhancing overall operational resilience. The project is currently ongoing, involving key activities including drafting and rollout of a crisis management plan, business impact analysis, emergency response plan and business continuity plans. The current focus is on the business continuity plans for NG911, with six training exercises completed in the last two months and more planned for this fall. This initiative also emphasizes staff preparedness through regular training and after-action reviews, fostering a sustainable capability for E-Comm to advance business continuity practices beyond the program's duration. The project is set to be complete by the end of 2025.

Upon reviewing the project charter this project, there are areas where it could be strengthened to enhance resilience and future readiness. Stronger ties with industry partner's business continuity plans, fostering organizational adoption through exercises and training, and maturing the program through investments in technology and improvements in business procedures.

## Redundancy capacity

A critical component of building resilience is establishing sufficient redundancy capacity. *Security Concern*

E-Comm operates two major sites (ECLMD and ECVI) for handling calls and dispatch. The Training Centre (TC) in Burnaby, originally intended as a backup site, is now also utilized for day-to-day call-taking when call volumes exceed the capacity of ECLMD. Currently, TC is utilized Monday to Friday each week as E-Comm

aims to practice and establish it as a hot redundancy site, meaning it is fully operational and equipped to take over the functions of the primary site in the event of a failure or disaster. This site would cover 53% of current peak demand, meaning that if the ECLMD site was compromised, the backup site would not be able to handle full demand. In the event of a disaster, there would be an expected increase in call volume, as seen during past incidents such as floods, wildfires and heat dome events. *Security Concern*

E-Comm is undertaking multiple short- and long- term initiatives to address facility issues and increase redundancy levels, including:

1. Amendments to the National Police Service (NPS) Net Secured Communication Policy that enable the **Work from home (WFH)** program for NER call takers have been approved but not yet published, but E-Comm has no capacity to execute it this year, pushing implementation to 2027. If the pilot proves successful, it will be scaled up.

Although the WFH program has not yet been officially initiated, E-Comm's redundancy planning has already factored in the assumption that the WFH program will account for up to 20% of police call taking volume in the long run. Nonetheless, there remains a risk that the WFH program may face challenges related to privacy, connectivity, and compliance with protocols in absence of supervision. Additionally, WFH call taking cannot be relied on in major events due to infrastructure stability in private homes (i.e. access to telephone and Wi-Fi networks, power back-up, etc.)

2. The lease for the TC site is set to expire at the end of 2028 with no option for renewal, E-Comm proposes to establish a new site, **third emergency communication centre (ECC3)** to replace the current backup location. The ELT presented this proposal to the Board in June and plans to request funding in September. The capacity in ECC3 is designed to achieve 80% redundancy by 2047, based on forecasted future demand and staffing levels. This site is intended serve as hot redundancy, meaning E-Comm will split workforce so that half operates at each site, minimizing capacity loss if one site goes down.

The proposed ECC3 site will still be in the Lower Mainland rather than in a different region of BC, which raises concerns about the lack of geo-diversity in facilities to enhance resiliency. E-Comm explained that this decision was made to facilitate quicker relocation for staff in the event of main site is compromised.

3. The target is to have ECC3 operational in Q1 2028. Following this, **renovations in ECLMD** are being considered to accommodate growth and address aging infrastructure and furnishings. During the renovation period, both the Training Center (TC) and ECC3 will continue to operate. If this project is approved and funding secured, the goal is to complete the renovations in ECLMD before the TC lease expires at the end of 2028.

These plans all require significant capital investment; as noted in the Finance section of this report, capital planning is minimal, and the limited ability and execution of advanced forecasting raises additional concerns of upcoming impacts to levies to fund these large projects.

Discussions regarding ECC3 with the Board have been ongoing for two years, with funding remaining a significant hurdle. The project's success is contingent on timely decision-making from the Board. Based on the business case provided earlier, the total capital requirement is estimated at \$14 million to \$16.3 million, along with incremental operating expenses of \$2.8 million to \$4.5 million from 2027.

Insufficient funding could delay the implementation of critical redundancy initiatives.

Finding #17	Impact
<p>E-Comm's current resilience framework reveals several strengths, such as backup power systems and cross-trained staff, but also significant gaps, including the absence of formal Business Continuity Plans (BCPs), insufficiently tested interagency call-routing, and limited integration with province-wide emergency communications.</p>	<p>The lack of a robust and comprehensive resilience framework could compromise E-Comm's ability to effectively respond to emergencies and maintain service continuity, increasing the risk of operational disruptions and undermining public safety and stakeholder confidence in the organization's preparedness.</p>

## Recommendations

### 17-1. Further build E-Comm's resilience capability by addressing key gaps identified in the detailed resilience assessment.

- Regularly test rerouting and backup procedures in collaboration with BCEHS to validate failover readiness and enable seamless service continuity in the event of system outages. This backup should also be reassessed to determine if it remains effective, as alternative solutions may be required.
- Develop plans and arrangements to support staff during extended emergency operations to maintain workforce health, readiness and operational performance
- Incorporate notification protocols for province-wide alerting systems to improve public awareness and access to 911 services during large-scale outages.
- Develop clear governance protocols for crisis situations to enable rapid, coordinated decision-making when normal governance process cannot be followed.
- Integrate longer term redundancy capacity building initiatives into capital planning processes to secure and plan for appropriate funding.
- Establish ties with other organizations' continuity plans to strengthen cross-agency operational alignment to improve emergency response coordination. This includes mapping key interdependencies by identifying operational touchpoints between E-Comm and other organizations including other PSAPs, and TELUS and review business continuity plans of these organizations to understand how they intend to operate during disruptions.
- Formalize mutual-aid agreements across other PSAPs to document commitments for resource sharing, technical assistance and staffing support.
- Conduct joint continuity exercises to test multi-agency coordination annually to confirm plans integrate effectively.

## Culture and workforce

E-Comm has undergone rapid workforce growth. The total active headcount has grown from 530 in June 2020 to 754 in June 2025, reflecting a growth rate of 42%, and a CAGR of 7.3%. The most significant increases are within the Operations and Technology Services teams. This reflects a response to growing operational demands and the transition to NG911. However, this growth has prompted questions from some stakeholders regarding the balance of operational effectiveness and financial management. A detailed breakdown can be found in Appendix M.

## Workforce capacity

A 2023 survey by the International Academies of Emergency Dispatch (IAEDTM) and the National Association of State 911 Administrators (NASNA) found an average vacancy rate of 25% in U.S. 911 centres. Similarly, according to the Canadian Union of Public Employees (CUPE), the latest National Operational Communications Centres (OCC) Resource Statistics indicated a nationwide vacancy rate of 42.8% in RCMP Dispatch (Telecommunications Operator) positions as of early 2025. Through engagement with other jurisdictions, workforce challenges, particularly recruitment difficulties and high rates of absenteeism, were commonly observed.

In contrast, E-Comm reports a comparatively low vacancy rate of 3.9% as of June 2025, although a significant portion of the workforce is on short- or long-term leave (soft vacancy rate of 10.9%), resulting in only about 85.2% of budgeted positions being staffed with personnel actively performing their duties. Specifically, within frontline operations, the vacancy rate stands at 2.4%, but soft vacancy rate at 15.5%, resulting in an effective workforce capacity of 82.1%. While E-Comm's staffing position seems to be stronger than many peers, workforce capacity remains constrained by employee absences. There is an opportunity to improve workforce resilience by implementing targeted strategies to reduce absenteeism and strengthen return-to-work support. Detailed headcount and vacancy numbers are shown in Appendix N.

## Workforce planning

A strong approach to workforce planning helps align human resources with organizational goals and positions the right talent to meet both current and future demands. Currently, People and Culture business partners at E-Comm engage with leaders to informally identify operational requirements and potential resource shortages. Looking ahead, its workforce planning is evolving to a more formal approach by 2026, emphasizing alignment with business objectives and defining needs ahead of the budget cycle and Board approval.

With the transition to NG911, workforce planning must account for evolving skill requirements, increased technology integration, and new ways to interact with the public. In preparation for the launch of NG911 in the fall, training for Operations staff on the new platform will commence following the completion of final system testing. In the next phase, the transition to NG911 will transform call-taking and dispatch operations, necessitating workforce adaptation to new technologies and processes, especially in multimedia processing. E-Comm has identified that new skillsets will be required, along with extensive staff training. However, given the adoption timeline for new functionalities has not yet been determined, operational standards, and user behavior are not well understood, the actual impacts remain unclear, which hinder the ability to effectively plan or proactively execute.

## Organizational design

E-Comm is currently undertaking an organizational design project for the whole organization to facilitate effective and efficient growth. The current focus of this project is on the Operations and Technology Services teams, with plans to extend its scope to the entire organization.

Key findings to date include leadership structure disparities between frontline operations and supporting functions, inconsistent role clarity and spans of control, the need for greater cross-site consistency and the integration of new functions such as business continuity and quality management into Operations team. To address these findings, the recommendations focus on clarifying decision-making authority and accountability, reducing duplication and role ambiguity, strengthening leadership support and consistency across sites, creating scalable and adaptable structures for future growth and improving cross-functional collaboration and operational efficiency. The necessary changes to team structure and headcount are anticipated to be incorporated into the 2026 budget.

This organizational design project has the potential to help E-Comm position itself as fit-for-purpose and resilient in a changing environment if executed effectively. However, given that changes in governance and service delivery model may impact E-Comm's mission and strategic objectives, current efforts must remain flexible to adapt to evolving needs. The timeline for the completion of the project across the organization is quite long, which could result in challenges being nimble and quick in responding to some of these potential upcoming changes.

## Workforce metrics

E-Comm has encountered significant challenges related to staffing and surge call volumes, which have contributed to employee burnout and high attrition. In response, E-Comm has implemented initiatives aimed at improving operational efficiency and culture. Feedback from employees indicates that while there have been improvements in workplace culture, opportunities for further growth remain.

E-Comm's workforce metrics have shown positive trends over the past years, evidenced by reductions in lower turnover rates, reduced overtime, and increased employee engagement. Specifically, E-Comm's turnover rate has dropped to 10% in 2024 from 14% in 2021. This is significantly lower than the average turnover rate for emergency communication centres in the U.S., reported at 20% in a 2023 survey by a global provider of public safety and emergency communication technology company NICE. It is also lower than the turnover rate for Triple Zero Victoria in Australia during the same period, which was 17%.

While the current turnover is a positive indicator of workforce stability, it is equally important to assess productivity, as sustained performance and service capacity depends not just on keeping staff, but on how effectively they are able to work. E-Comm's sick rates did not show any significant improvement. In 2024, the average sick hours taken by call takers (58 hours/year) and dispatchers (99 hours/year) remained high. While the high sick rate does not appear to correlate with staff retention, as the turnover rate remains at an acceptable range, it does create productivity issues because frequent absences can disrupt workflow and increase the burden on remaining staff as well as introducing challenges to workforce planning.

## Training

E-Comm employs an onboarding training program that combines classroom and on-the-job training. Feedback gathered during site visits indicated mixed opinions, with some employees feeling it was sufficient while others felt it fell short.

While current training does not include a mandated cultural sensitivity component, E-Comm is developing a cultural safety training program that will be required for Operations employees. In the interim, all staff have access to resources on cultural sensitivity topics, including inclusion, diversity, equity, and the context of relationships with Indigenous Peoples.

A stakeholder from another jurisdiction noted that E-Comm has a relatively well-developed training system, supported by a dedicated team focused on training and on-the-job coaching made possible by its size and scale. Nonetheless, there remains an opportunity to strengthen the training approach. The mixed feedback from employees suggests a need to better address individual differences and needs, which can be achieved through continuous training support, regular coaching check-ins and supervisory guidance. Additionally, there is an opportunity for the Province to support through creation of certification and training programs that could enhance training efforts across the region and facilitate a more standardized approach.

## Occupancy

The occupancy rate is defined as the percentage of time that call-taking staff are actively engaged in handling calls. E-Comm has set occupancy rate targets aligned with industry practices (911: 55%; Police/Fire

emergency ECLMD: 65%; Police/Fire non-emergency ECLMD: 75%; Police call-taking ECVI: 65%), with consideration to avoid excessively high rates due to the nature of calls received.

E-Comm's occupancy rates in the first quarter of 2025 were significantly lower than its target, especially for 911 call taking. This was primarily due to the call volume being lower than the forecasted volume, along with E-Comm hiring additional call takers in anticipation of increased demand during the summer peak period. E-Comm has been improving its demand forecasting capabilities supported by the Data and Analytics team. They now leverage data-driven methods and uses forecasting models to predict hourly call volume for different call types by incorporating operational metrics such as occupancy, shrinkage, and average handling time to provide a more accurate estimate of the FTEs.

There are opportunities to achieve a healthier occupancy rate by further improving demand forecasting such as incorporating weather conditions into call volume predictions and tracking staff experience to analyze variation in average handling time between new and experienced call takers.

## Compensation

E-Comm's compensation approach is in line with market standards. It employs a P50 compensation philosophy for management and exempted roles, aiming to position salaries at the median of the market to attract and retain talent. Feedback from stakeholders indicates that E-Comm pays certain staff above the market fair level. There have been instances where exceptions to this alignment were made, particularly for high-demand roles in Data and Analytics and Technology Services, where E-Comm has opted to pay P75 percentile for certain niche roles. A formal policy and internal approval process are in place to guide these exceptions. For unionized roles, salaries are determined through negotiations with the union and are outlined in the collective agreement.

## Performance evaluation

The performance evaluation process plays a critical role in holding employees accountable, aligning them with organizational goals, identifying areas for improvement, and supporting overall development within the workforce. E-Comm has established a structured performance evaluation process for both the ELT and employees. This process involves setting goals early in the year, establishing a goal-setting framework that cascades from the CEO to the rest of the organization. Each ELT member has a performance objectives document outlining target outcomes and timelines. Mid-cycle check-ins are conducted, followed by full reviews in the last quarter. Employees complete self-evaluations, and the respective leaders provide feedback based on established scoring criteria.

The performance management process at E-Comm is becoming more structured. The People and Culture team collaborates with Finance team to determine performance allocations, considering market research and environmental factors to create competitive compensation structures. Exempt employees meeting expectations receive a percentage increase, which combines a cost-of-living adjustment with a performance-based increase, while those exceeding expectations may receive a higher percentage.

A structured performance improvement plan has also been implemented for employees who do not meet performance expectations. A personalized approach tailors the plan to the individual employee and their respective leader, setting clear expectations and goals, establishing a structured timeline for improvement, and providing additional training and development opportunities. Overall, E-Comm has established a structured process for managing employee performance and offers ongoing training for both managers and employees to support consistent use of the process. Regular feedback mechanisms are also in place to inform continuous improvement of the performance evaluation system.

## Use of technology

Significant efforts that E-Comm has focused on over the past years include cloud strategies aimed at transitioning workloads to cloud platforms to enhance operational resilience. Additionally, substantial investments have been made in cybersecurity efforts, implementing advanced security measures to strengthen defenses against potential threats. Furthermore, E-Comm has been diligently working on the implementation of the NG911 system, which is set to revolutionize emergency response capabilities. A notable achievement directly related to operational services is the deployment of the Genesys platform for non-emergency call-taking in May 2024. This new system has introduced significant improvements to non-emergency services, including updated wait time expectations and callback functionality. These enhancements not only improve the user experience but also facilitate better data collection for analysis.

Despite these advancements, E-Comm continues to face challenges with system integration within the organization, as internal systems operate independently without automated data sharing. This hinders the ability to share information seamlessly across departments. This limitation leads to inefficiencies, increased complexities and manual efforts required in processes, and potential errors in data, affecting E-Comm's capacity to leverage data effectively for strategic planning, operational improvements, and reporting.

Examples from international jurisdictions that may offer value if adapted appropriately include:

- **Automated Triage for High Call Volume:** New Zealand Spark uses automated triage systems to facilitate the routing of 911 calls to secondary PSAPs during peak times when calls exceed a 45 second answer time. It can enhance surge capacity during major incidents and reduce wait times. However, there is a risk that some callers may struggle to navigate the system, leading to delays or misrouted emergencies. To be effective, the system must include clear activation thresholds and be easy to use. If implemented well, it can improve operational resilience during peak demand.
- **Voice Bot for non-emergency calls:** Several jurisdictions in the United States such as Portland and City of Virginia Beach use an AI-powered voice bot system for non-emergency calls that answers calls, conducts short triage questions, and routes callers to appropriate resources or a live call taker for public safety matters. This helps shorten wait time, but risks include reduced accessibility for vulnerable populations such as senior, those with limited language proficiency and who may find automated system impersonal or difficult to navigate. Success depends on intuitive design, fallback options to live agents, and ongoing monitoring. If carefully deployed, this approach can improve efficiency and caller experience without compromising service quality.

The transition to NG911 presents substantial opportunities for technological innovation, particularly through the integration of Internet of Things (IoT) devices, AI-assisted triage, sensor-enabled decision support and other advanced technologies into emergency response. To responsibly leverage these innovations, it is essential for comprehensive policies and regulations to be established at a provincial or municipal level, while emergency communication centers like E-Comm must develop their own internal guidelines. These frameworks will facilitate alignment with industry leading practices, safeguard user privacy and uphold the integrity of emergency response services.

Currently, Canada has no formal policy framework governing the use of advanced technologies in public safety. Should the Province assume a more active role in setting standards, it should require thorough risk assessments, pilot testing and performance benchmarks before new technologies are deployed. Standards should also address privacy, accessibility, and fallback protocols to promote safe, inclusive and reliable use in emergency context.

# Prioritization and implementation

This report outlines **26 targeted recommendations** that address the issues or opportunities identified across the three workstreams – governance, finance, and operations – and provide an actionable path forward. To guide sequencing and decision-making for implementation, each recommendation was assessed against two core criteria: impact and complexity.

## Impact

The first criterion, impact, is defined as the scale or extent of the anticipated benefits associated with implementing a recommendation. The assessment considers the following factors with an overarching impact rating of high, medium or low:

- How well the recommendation addresses concerns from stakeholders, including local governments, funding agencies, and operational staff.
- The potential to enhance the reliability and effectiveness of emergency communication services.
- The ability to improve transparency or clarity in E-Comm's governance and funding mechanisms.
- The number of operational, financial or governance areas that would be positively affected.
- The degree to which the recommendation supports broader strategic initiatives and other proposed changes.

## Complexity

The second criterion, complexity, assesses the degree of effort, coordination, and difficulty required to implement a recommendation. Estimated complexity is driven by the following factors, with each recommendation given an overall complexity rating of high, medium, or low:

- The estimated level of effort required to implement the recommendation (time, budget, personnel).
- The degree of change required to governance, financial arrangements, or operational processes.
- The extent of engagement or coordination required with external entities (e.g., local governments, other PSAPs, provincial ministries).
- The number of interdependencies with other recommendations or initiatives.
- The number of systems, processes, tools, or agreements requiring modification.

Recommendations have been assessed based on observations from this review. The prioritization matrix is intended as directional guidance for planning and implementation; however, a detailed plan should be confirmed through considerations related to resource availability, operational needs and other priorities. See **Appendix O** for the detailed prioritization matrix.

In summary, there are three recommendations that are considered foundational to the success of the organization as well as the ability to successfully implement several other recommendations. Although these recommendations will be complex to implement, they should be implemented with priority. Secondary to these, are several high impact recommendations which should be prioritized above the others.

**Foundational recommendations**  
(key to the ongoing success of the organization)

- Optimize E-Comm's Board size to 8-12 independent members with an appropriate mix of skills.

	<ul style="list-style-type: none"> <li>Clearly define the Province’s role within emergency communications and align legislative mechanisms to support clarity in roles and responsibilities.</li> <li>Define a comprehensive stakeholder management framework aligned to the governance model which reflects both governance-level and operational relationships.</li> </ul>
<p><b>High impact recommendations</b> (Will have a significant impact on the organization and its stakeholders)</p>	<ul style="list-style-type: none"> <li>Shift strategic planning to a three-year plan to enable greater responsiveness to key issues.</li> <li>Refocus the ELT on strategic priorities.</li> <li>Develop a corporate performance management framework aligned to strategic planning to support accountability.</li> <li>Incorporate strategic priorities within budget setting.</li> <li>Annually present a full organizational budget to the Board for approval.</li> <li>Create a standardized service catalogue with definitions of services offered and associated pricing structures.</li> <li>Implement pricing strategies to support alignment between services provided and costs to deliver.</li> </ul>

There are many ways to address the recommendations made within, the implementation plan requires some up-front decisions to be made on future state design covered by the foundational and high-impact recommendations. Further defining the roadmap for implementation requires consideration to accountabilities, interdependencies, timing, and resources available.

The complete list of recommendations is listed below.

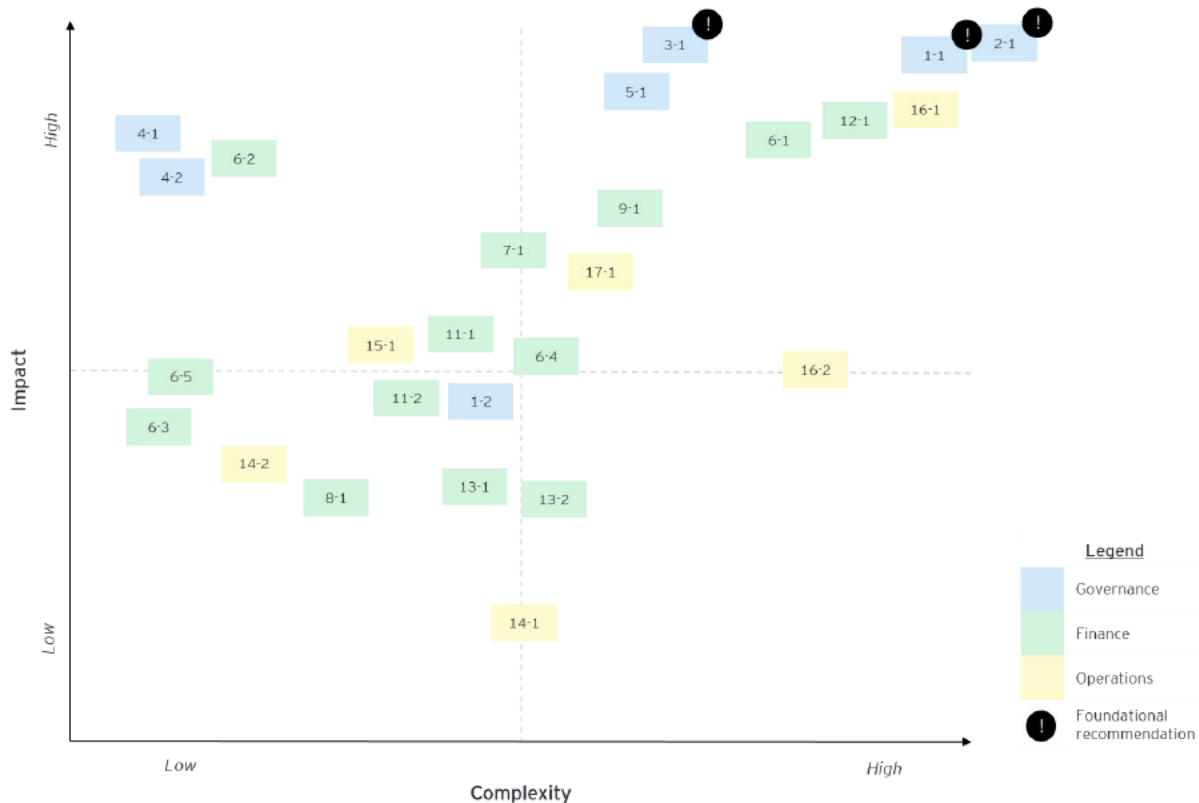


Figure 23: Prioritization matrix

Ref.	Recommendation
1-1	Optimize the Board size to 8-12 independent members with an appropriate mix of skills to enhance governance effectiveness, accountability, and decision-making.
1-2	Update the Terms of Reference for the Board of Directors to include a structured Board tenure policy and cycle recruiting for positions to ensure staggered term-end across the positions.
2-1	Clearly define the Province's role within emergency communications and align legislative mechanisms to support clarity in roles and responsibilities, effective governance, performance management, and the ability to influence impacts to public safety.
3-1	Define a comprehensive stakeholder framework that is both complementary and aligned to the new governance model. The framework should clearly outline roles and responsibilities (both on behalf of the client and shareholder organizations, as well as E-Comm), and should reflect both governance-level relationships and operational relationships.
4-1	Shift strategic planning to a three-year plan to enable greater responsiveness to key issues as they arise, and higher impact strategic decision making.
4-2	Refocus the ELT on strategic priorities and critical challenges requiring executive direction to enable clearer prioritization, more effective governance and accelerated transformation progress.
5-1	Develop a structured Corporate Performance Measurement Framework aligned to strategic planning objectives to support regular and timely updates against plan as well as ongoing organizational reporting.
6-1	Revisit the strategic planning process and financial governance practices to incorporate and align strategic priorities within budget setting.
6-2	Annually present a full organizational budget to the Finance Committee for analysis and Board for approval, inclusive of key trade-off decisions that are required to manage costs.
6-3	Include levy communications formally in the stakeholder management framework to support funding agencies in understanding how costs and approved budget are translated into levies.
6-4	Adjust the budgeting process to focus on services or service-based budgeting.
6-5	Align financial forecasting processes with local government budgeting timelines.
7-1	Continue to move toward accurate five-year forecasts for the Board and funding agencies to provide greater financial predictability for E-Comm and clients.
8-1	Establish a contingency or stabilization reserve with appropriate controls to smooth unexpected expenses and impacts on levies during significant, unanticipated events.
9-1	Enhance expense management practices and reporting to include ongoing expense tracking, budget variances and forecasting that track progress and variances against strategic priorities.
11-1	Align corporate costs directly to service delivery and the respective Business Lines to enhance financial accountability and transparency.

Ref.	Recommendation
11-2	Enhance transparency in stakeholder reporting by including costs associated with the direct consumption of services.
12-1	E-Comm should consider implementing pricing strategies to support alignment between services provided and cost to deliver.
13-1	Create a capital reserve fund specifically for Operations to support adequate funding for capital projects and enhance financial planning and sustainability.
13-2	Consider including funding for the capital reserve (more than amortization expenses) in annual levies to support financial sustainability and to smooth the impact of capital expenditure over time.
14-1	Develop a benchmarking framework that incorporates industry standards, leading practices from other jurisdictions and client expectations for key metrics, while implementing a process for regular review of metrics and benchmarks. Service quality metrics should be incorporated as key metrics.
14-2	Service quality metrics should be used for continuous improvement in call-taking and dispatch services, including non-emergency calls.
15-1	Reassess current service level targets to determine if they appropriately balance client needs, cost-effectiveness and alignment with industry standards. Document the approved targets and establish a cadence for regular reassessment.
16-1	Create a standardized service catalogue with definitions of services offered by E-Comm. This should include detailed descriptions each service and the associated pricing structures by service and be completed in conjunction with improvements to the new financial model.
16-2	Develop and implement formal standardized agreements with all operational clients to clearly outline the scope of services provided.
17-1	Further build E-Comm's resilience capability by addressing key gaps identified in the detailed resilience assessment.

# Conclusion

This independent review of E-Comm has highlighted key challenges and opportunities for the organization in its role as a key provider of emergency communication services.

The findings indicate that the Province's role in emergency communications is defined across several statutes, which assign responsibilities to different entities but do not establish a unified legislative or governance framework. This fragmentation limits the Province's ability to set consistent standards, align priorities, and oversee system-wide performance.

Within E-Comm, the current 23-member Board has become too large to facilitate effective strategic decision-making. Its size has led to slower decisions, reduced engagement on critical issues, and challenges in maintaining institutional continuity. Additionally, the executive leadership approach has tended to focus on immediate operational demands, with infrequent updates to the strategic plan.

Financially, rising costs, unpredictable levies, limited transparency, and short-term budgeting cycles create uncertainty for funding agencies and hinder long-term planning. Operationally, the absence of defined benchmarks or performance targets makes it difficult to assess service quality. Quality assurance processes are primarily reactive, triggered by complaints or incidents rather than ongoing monitoring, and resilience gaps have been identified during major incidents.

To address these challenges, this report outlines 26 recommendations. One key recommendation calls for the Province to clarify and define its role in emergency communications and align legislative mechanisms to support clarity in roles and responsibilities, effective governance, performance management, and the ability to influence impacts to public safety. The remaining recommendations focus on E-Comm, emphasizing the need to strengthen governance, enhance financial planning and transparency, introduce clear performance measurement and quality assurance frameworks, standardize contracting practices, and improve redundancy and resilience.

While most actions fall to E-Comm, successful implementation will require collaboration among the Province, local governments, public safety agencies, and E-Comm. Adopting recommendations outlined within this report provides E-Comm with a path forward to improve governance, financial and operational practices, while enabling the Province to clearly define its role and objective in the emergency communications ecosystem and exercise stronger oversight of public safety outcomes.

# Appendices

## Appendix A: Glossary of terms

Term	Definition
<b>Business Line</b>	Business Lines reflect how E-Comm delivers services and are reflective of a combination of service user type and location. Business Lines include: <ul style="list-style-type: none"> <li>▪ 911 PSAP</li> <li>▪ ECLMD Police</li> <li>▪ ECVI Police</li> <li>▪ Fire Dispatch</li> <li>▪ Radio</li> <li>▪ Fire RMS</li> <li>▪ Fire CAD</li> </ul>
<b>CAD</b>	Computer-Aided Dispatch System, the technology used by dispatchers in all emergency services to direct responders to the scene of an incident.
<b>CAGR</b>	Compound Annual Growth Rate
<b>Contracting party</b>	An entity that enters, or is supposed to enter, into a legally binding agreement with E-Comm for operational services. This can also refer to a group of clients who join to form a single contracting party in the agreement.
<b>Corporate Cost Allocation Model</b>	The model used to allocate costs from corporate cost centers to front-line cost centers
<b>Cost Center (CC)</b>	An entity in the accounting structure in which revenue and expenses are recorded. E-Comm has 31 CC's which are classified into five different types of CC namely 911, Dispatch, Radio, Corporate and Other.
<b>Costing Model</b>	Costing Model is part of the New Financial Model and refers to the model that allocates corporate costs to Business Lines.
<b>CPIC</b>	Canadian Police Information Centre.
<b>Designated Company Service</b>	Designated Company Service means each of police services, fire services, ambulance services, and municipal services and currently include only E-Comm's radio services to shareholders.
<b>ECC3</b>	Third emergency communication centre
<b>ECC Act</b>	Emergency Communications Corporation Act
<b>ECLMD</b>	Emergency Communications Lower Mainland, the official name of the Emergency Communication Centre located at 3301 E Pender St in Vancouver
<b>ECVI</b>	Emergency Communications Vancouver Island, the official name of the E-Comm Emergency Communications Centre at 4219 Commerce Circle in Saanich
<b>ER</b>	Emergency - refers to emergency call taking and dispatch
<b>Expenses and Costs</b>	Income statement expense line items (e.g. Salaries and benefits, Professional fees, etc.). Costs are defined as income statement expenses plus any capital costs.
<b>FCO</b>	Fire communication operations including fire emergency and non-emergency call-taking and dispatch

<b>Fire technology</b>	Fire technology services include both Record Management System (RMS), and Computer-Aided Dispatch System (CAD)
<b>Front-line businesses</b>	Business lines that deliver services to customers that are charged as a fee or levy
<b>FTE</b>	Full-Time Equivalent which calculates how many employees would be working if they all worked full-time based on the number of hours worked
<b>Funding agency</b>	Shareholders and service contract partners to whom levies are charged. These may not be the same as the service user.
<b>NER</b>	Non-Emergency - refers to non-emergency call taking and dispatch
<b>New financial model</b>	The proposed new financial model (which has not been approved by the Board and remains in draft form) includes two underlying models: <ol style="list-style-type: none"> <li>1. Costing Model</li> <li>2. Pricing Model</li> </ol>
<b>OCC</b>	RCMP Operational Communication Center
<b>Occupancy rate</b>	Occupancy rate is defined as the percentage of time that call-taking staff are actively engaged in handling calls.
<b>Overtime rate</b>	Overtime rate is calculated as the number of hours paid on overtime divided by the number of paid productive hours, expressed as a percentage
<b>PCO</b>	Police communication operations services including police emergency and non-emergency call-taking, and dispatch
<b>PCT</b>	Police Call Taking
<b>Pricing Model</b>	Pricing model is part of the New Financial Model and refers to the model that allocates Business Line costs to individual funding agencies levies <ul style="list-style-type: none"> <li>▪ Allocates direct and indirect costs for Police dispatch services to funding agencies.</li> <li>▪ Note: although the Pricing model refers to Police levies, Fire dispatch and Fire technology and Radio levies have their own pricing models in place that are run alongside this new Pricing Model.</li> </ul>
<b>PSAP</b>	Public Safety Answering Point
<b>RMS</b>	Record Management System, the technology used by responders in all emergency services to track incidents and investigations as well as other recordable matters related to their services
<b>Service user</b>	Recipients of services delivered by E-Comm
<b>Sick rate</b>	Sick rate is calculated as the number of paid sick hours divided by the number of agent regular and overtime hours, expressed as a percentage.
<b>Transformation Plan</b>	The plan that E-Comm developed in 2022 to guide the organization's focus and structuring of projects and initiatives based on five strategic pillars.

Table 7: Glossary of terms

## Appendix B: List of participants

The following list includes stakeholders that were interviewed or surveyed through the course of our review.

Name	Role, Organization
Adi Jakupovic	Director, 9-1-1 and Emergency Telecommunications, Direction générale de la sécurité incendie et des télécommunications d'urgence, Ministère de la Sécurité publique, Gouvernement du Québec
Allan Suckling	Senior Director, Information Technology Transformation, RCMP E (BC) Division
Amy Sekhon	Financial Lead, NG911 Project, E-Comm
Andrea Langille	Director, Financial Services, E-Comm
Andrew Hicik	Director of Finance, Town of Sidney
Andrew McPhee	PSAP Supervisor, Nelson PD
Andrew Renfree	Chair, Canadian 911 Coalition
Andy Brennan	Purchasing Manager, Regional District of Central Okanagan
Angela Kaiser	Independent Board Director, E-Comm
Ashley Hoytema	People & Culture Business Partner, E-Comm
Bonnie Longhurst	Director, PPSTN and Emergency Communications, Saskatchewan Public Safety Agency
Brian Catinus	Secretary Treasurer, British Columbia Professional Fire Fighters' Association (BCPFFA)
Brian Edwards	BC Municipal Police Chiefs Association; Assistant Commissioner, RCMP
Brian Godlonton	Board Director, E-Comm; Fire Commissioner, Province of BC
Carly Taylor	Director, People and Culture, E-Comm
Carmichael Howes	Interim Decision Support Supervisor, First Nations Emergency Services Society (FNESS)
Charlene Liu	Senior Financial Analyst, E-Comm
Charlene Luskey	Executive Director, Emergency Communications, Technical and Support Services, Saskatchewan Public Safety Agency
Chris Kellett	Emergency Services Working Group (ESWG) - CRTC
Colin Watson	Chief Constable, Abbotsford Police Department
Craig Hodge	Metro Vancouver Regional District rep, Union of BC Municipalities (UBCM); City of Coquitlam Councillor
Dan Derby	President, Fire Chiefs' Association of BC; Regional Fire Chief of Kootenay Boundary Regional Fire Service
Dan Ruimy	Board Director, E-Comm; Mayor, Maple Ridge
Darcy Wilson	Executive Director, Emergency Communications Centres, E-Comm
Dave Cunningham	Vice President, Communications and Public Affairs, E-Comm
Dave Fleugel	BC Municipal Police Chiefs Association; Chief Constable, Port Moody Police Department
Dave Mitchell	Member of ABC Working Group
David Guscott	Retired CEO, E-Comm
Debi Mazur	Chair, Director At Large, Association of BC 9-1-1 Service Providers (ABC 911)
Denise Nawata	Independent Board Director, E-Comm

Name	Role, Organization
Donald Grant	President, CUPE Local 8911
Doug Campbell	Board Chair and Independent Board Director, E-Comm
Doug Scott	Former Board Director, E-Comm; Deputy Minister Finance, Province of BC
Dwayne McDonald	Deputy Commissioner, RCMP
Dwight Seymour	Fire Chief, City of Kelowna
Dylan Kruger	Board Director, E-Comm; City of Delta Councillor
Eugene Johnson	Executive Director, Hospitals and Provincial Health Services Division, Ministry of Health
Frank Chong	Chair, Vancouver Police Board
Gail Hamilton	Director, NB 911 (Branch), Justice & Public Safety, Government of New Brunswick
Gary MacIsaac	Executive Director, Union of BC Municipalities (UBCM)
Gillian Harper	Senior Organizational Development Specialist, E-Comm
Greg Conner	Vice President, People and Culture, E-Comm
Gurdip Sandhu	Director, Financial Planning and Analysis, E-Comm
Holly Barkwell	Regional Director, NENA Canada
Howard Chow	BC Municipal Police Chiefs Association; Deputy Chief Constable, Vancouver Police Department
Ivan Rincon	Executive Director Project Management, Ministry of Citizens' Services, Connectivity
Jamie McRae	Deputy Chief, Victoria Police Department
Jason Cairney	User Committee Chair, E-Comm; Deputy Fire Chief, City of Surrey
Jason High	Inspector, Operations Support Section, Vancouver Police Department
Jason Jackson	President, Ambulance Paramedics of BC - CUPE 873 (APBC)
Jason Jaschinsky	Director General IM/IT, RCMP E (BC) Division
Jason Rude	Vice President, Finance and Chief Financial Officer, E-Comm
Jeff Beckwith	Fire Chief, City of Prince Rupert
Jeff Smith	Director Infrastructure Policy, TELUS
Jennifer Brown	People & Culture Business Partner, E-Comm
Jennifer Moreton	President, APCO Canada
Jim Cambridge*	Vice President, BC Association of Police Board
Jim Wishlove	Fire Chief, City of Richmond
Joy Stevenson	Assistant Deputy Minister, Emergency Services Telecommunications Division, Ministry of the Solicitor General, Government of Ontario
Karen Fry	Fire Chief, City of Vancouver
Karen Levitt	Board Director, E-Comm; Deputy City Manager, Vancouver
Karen Ranalletta	President, CUPE BC
Kash Heed	Board Director, E-Comm; City of Richmond Councillor
Kaye Bright	Strategic Partnerships and Community Engagement Advisor, First Nations Emergency Services Society (FNESS)
Kelly Bellefleur	Acting Fire Chief, Campbell River

Name	Role, Organization
Kelly Hisaki	Director, Next Generation 9-1-1 and Public Safety Broadband, Emergency Telecommunications Division, Government of Ontario
Ken Leung	Board Director, E-Comm; City of Abbotsford - General Manager
Ken Shymanski	Retired CEO, E-Comm
Kenneth Uzeloc	Protective Service Director of Fire Chief of City of Kamloops
Kerry Power	Director - 911 Division, Emergency Services, Department of Justice and Public Safety, Government of Newfoundland and Labrador
Kurt Pregler	Transformation Oversight Taskforce Chair, E-Comm; CIO, TransLink
Ladan Irannejad	Executive Director, Data, Analytics and Decision Support, E-Comm
Lara Victoria	President, BC Association of Police Boards (BCAPB); Delta Police Board
Larry Thomas	Fire chief, Surrey Fire Department
Leanne Heppel	Board Director, E-Comm; Chief Ambulance Office, BCEHS
Liam Edwards	Chief Administrative Officer, Town of Sidney
Li-Jeen Broshko	Vice President, Legal and Governance, E-Comm
Li-Yen Lim	Accounting Manager, E-Comm
Lyndsay Kay	BC Emergency Health Services (EHS)
Magni Magnason	Project Manager, BCP lead, E-Comm
Marianne Alto	Director, Capital Regional District; Mayor, City of Victoria
Marty Dupas	Director & Tri Services Working Group Co-Chair, Association of BC 9-1-1 Service Providers (ABC 911)
Mary Trentadue	Board Director, E-Comm; New Westminster Police Board
Matt Thompson	Project Manager, Future of Work, E-Comm
Meghan Lahti	Board Director, E-Comm; Mayor, City of Port Moody
Melanie Perrin	Director, Association of BC 9-1-1 Service Providers (ABC 911) Regional District of Fraser-Fort George, Senior Manager of Public Safety Services
Micayla Hayes*	President, BC Association of Police Board
Mike Bhatti	Board Director, E-Comm; Superintendent, RCMP
Mike Ho	Corporate Counsel & Associate Corporate Secretary
Mike Hurley	Board Chair, Metro Vancouver Regional District
Mike Little	Board Director, E-Comm; Mayor, District of North Vancouver
Mike Walroth	Director of Protective Services, Regional District of Central Okanagan
Mike Webb	Former CIO, E-Comm
Murray Dinwoodie*	Director, BC Association of Police Board
Murray Gunville	Director, Information Technology, Saskatchewan Public Safety Agency
Nancy Blair	Chief Transformation Officer, E-Comm
Nancy Kotani	Board Vice Chair and Independent Board Director, E-Comm
Nancy McCurrach	Board Director, E-Comm; City of Port Coquitlam Councillor
Nick Bell	User Committee Vice Chair, E-Comm

Name	Role, Organization
	Inspector, OIC Administration Division, West Vancouver Police Department
Oliver Grüter-Andrew	President and CEO, E-Comm
Patrick Johnstone	Director, City of New Westminster
Patrick Lalonde*	Secretary, BC Association of Police Board
Paul Douglas	Board Director, E-Comm; Saanich PD Deputy City Councillor
Paul Hyland	BC Municipal Police Chiefs Association Chief Constable, New Westminster Police Department
Paul Mochrie	City Manager, City of Vancouver
Peggy Giesbrecht	Manager, Strategic Initiative (FIFA), E-Comm
Phil Lemire	Executive Director, Fire Chiefs' Association of BC
Ravi Chhina	Deputy CAO, Metro Vancouver Regional District
Reiko Tagami	Policy Analyst, Union of BC Municipalities (UBCM)
Rod Dewar	Independent Board Director, E-Comm
Sally Barnes	Operations Program Manager, E-Comm
Sandeep Dhillon	ECC Police Dispatch Manager, E-Comm
Stacy Ashton	Executive Director, Crisis Center of BC
Stephen Thatcher	Vice President, Operations, E-Comm
Steve Eely	Board Director, E-Comm; Retired Superintendent, Vancouver Police Department
Susan Stanford	Board Director, E-Comm; Assistant Deputy Minister, Ministry of Citizens' Services, Connectivity
Tasha Henderson	City of New Westminster Councillor; New Westminster Police Board
Thomas Vigie	Senior Data Scientist, E-Comm
Tim Baillie	Board Director, E-Comm; Township of Langley Councillor
Tom Wolff von Gudenburg	President, BC Association of Municipal Chiefs of Police Deputy Chief, West Vancouver Police
Tony Gilligan	Vice President, Technology Services, E-Comm
Tracy Lim	Executive Director, Operations Support Services
Trish Mandewo	President, Union of BC Municipalities (UBCM)
Tyler Moore	Director, Operations Relationship Management, E-Comm
Wendy Mehat	President, BC Associations of Chiefs of Police (BCACP)

\* Indicates participants engaged through survey

**Table 8: List of participants**

## Appendix C: Jurisdictional scan

A jurisdictional scan was conducted to examine how other Canadian provinces and selected international jurisdictions organize, govern, and fund PSAP services. This work provides a perspective on the range of service delivery approaches. While every jurisdiction operates within its own legislative, geographic, and operational context, looking beyond BC’s borders helps identify alternative models, governance structures, and funding mechanisms that could inform future decision-making through consideration to unique challenges, opportunities, and best practices. The inclusion of both domestic and international examples offers a richer understanding of the options available, illustrating how different jurisdictions have addressed common challenges in areas such as service consistency, modernization, and cost management.

### National landscape

Across Canada, there is a noticeable trend toward more provincial models for service delivery, especially with the transition to NG911. For instance, provinces like Alberta and Quebec have established formal 911 standards that PSAPs must follow, promoting consistency and accountability. Similarly, some provinces, including New Brunswick and Newfoundland and Labrador, have created dedicated provincial 911 offices to oversee and manage their 911 systems. In Saskatchewan, a crown corporation manages and delivers PSAP services. However, it is important to note that this oversight often extends only to primary PSAP functions and does not encompass secondary PSAPs, or police, fire, or ambulance dispatch operations. Additionally, many jurisdictions have implemented a 911 levy on cell phones to support the system, providing a dedicated and additional funding source for maintaining and enhancing 911 services.

The following map provides a summary of the service delivery models adopted in jurisdictions across Canada.

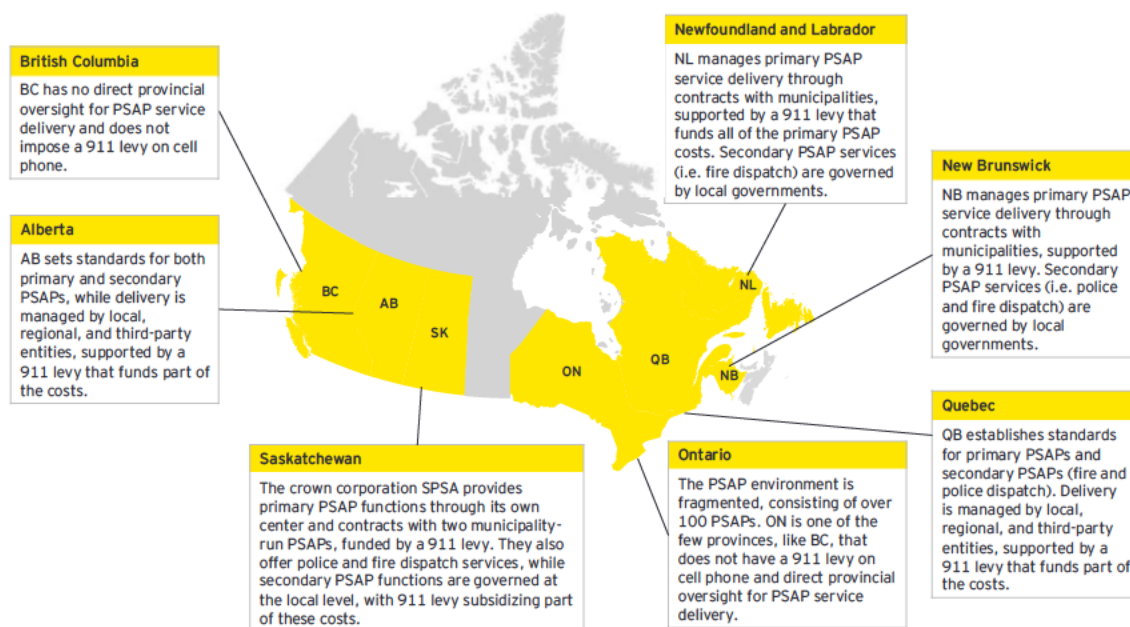





Figure 24: Overview of PSAP structures across Canada

Jurisdiction	Population	Size (km2)	Overview	Governance structure	Standards & regulations	Funding structure	System resilience
 <b>Alberta</b>	4.3M	635K	<ul style="list-style-type: none"> <li>Alberta sets standards for both primary and secondary PSAPs, while delivery is managed by local, regional, and third-party entities, supported by a 911 levy that funds part of the costs.</li> <li>There are 20 primary PSAPs and 6 secondary PSAPs in Alberta.</li> <li>PSAPs are primarily operated by municipalities, though some are managed by regional collectives. There is one private PSAP service provider in Alberta.</li> </ul>	While local governments are responsible for service delivery, service standards are governed by provincial requirements set under the Alberta Emergency 911 Act.	The Alberta Emergency 911 Act empowers the Alberta government to establish standards (Alberta 911 Standards) for both primary and secondary PSAPs.	A 911 cell phone levy of \$0.95 per month covers about half of the cost, with the remaining expenses funded by local governments.	Alberta enforces provincial 911 standards that include requirements for redundancy, cybersecurity and interoperability across primary and secondary PSAPs.
 <b>New Brunswick</b>	776K	71K	<ul style="list-style-type: none"> <li>New Brunswick manages primary PSAP service delivery through contracts with municipalities, supported by a 911 levy. Secondary PSAP services (i.e. police and fire dispatch) are governed by municipalities.</li> <li>Six primary PSAPs are run by municipalities, which also manage police and fire dispatch.</li> <li>RCMP and the Provincial Mobile Communications Centre are also leveraged for police dispatch and provincial enforcement support respectively.</li> </ul>	The province manages primary PSAP service delivery through contracts with municipalities. Police and fire dispatch services are governed by local governments.	The province has contracts with the six PSAPs in the province to define performance metrics and Standard Operating Procedures for primary PSAP services.	A 911 levy of \$0.97 per month on landline and cell phones funds part of the services with the remaining expenses funded by local governments.	Each PSAP has a designated alternate PSAP to take calls in the event of a failure. The province has mandated modernizing 911, including linking all PSAPs into one connected virtual centre, followed by a provincial dispatch system.
 <b>Newfoundland and Labrador</b>	510K	358K	<ul style="list-style-type: none"> <li>Newfoundland and Labrador manages primary PSAP service delivery through contracts with municipalities, supported by a 911 levy that funds all of the primary PSAP costs. Secondary PSAP services (i.e. fire dispatch) are governed by local governments.</li> <li>Two primary PSAPs are operated by municipalities, which also manage fire dispatch.</li> <li>Police dispatch is managed by RCMP and the Royal Newfoundland Constabulary (RNC).</li> </ul>	The province manages primary PSAP service delivery through contracts with municipalities. Fire dispatch is governed by local governments.	The province has contracts with the two PSAPs in the province to set requirements for primary PSAP services.	A 911 levy of \$0.75 per month on landline and cell phones covers the cost for primary PSAP function. Local governments fund the fire dispatch costs.	Two PSAPs can transfer calls to each other in case of failure, with annual testing conducted for both manual and automatic shutdown procedures.

Jurisdiction	Population	Size (km2)	Overview	Governance structure	Standards & regulations	Funding structure	System resilience
 <b>Ontario</b>	14.2M	892K	<ul style="list-style-type: none"> <li>The PSAP environment is highly fragmented, consisting of over 100 PSAPs. Ontario is one of the few provinces, like BC, that does not have a 911 levy on cell phones and direct provincial oversight for PSAP service delivery.</li> <li>Most PSAPs are operated by municipal fire and police departments. Two private PSAP service providers in the province.</li> <li>RCMP and Ontario Provincial Police (OPP) also operate several PSAPs in Ontario.</li> </ul>	Most PSAPs are governed by municipalities, with some exceptions for those operated by RCMP and OPP.	No provincial standards or regulations. Service standards are set individually by local governments or service providers.	Excludes those operated by provincial or federal agencies, PSAPs are primarily funded by local government, while the province provides grants to support the transition to NG911.	With several large centers operating in the region, Ontario maintains a coordinated backup system where agencies can support and back up each other.
 <b>Quebec</b>	8.5M	1.3M	<ul style="list-style-type: none"> <li>Quebec establishes standards for primary PSAPs and secondary PSAPs (fire and police dispatch). Delivery is managed by local, regional, and third-party entities, supported by a 911 levy that funds part of the costs.</li> <li>Twenty-two municipalities operate their own PSAPs.</li> <li>Three nonprofit organizations and one private entity provide services to other municipalities.</li> <li>One of the nonprofit PSAPs provides services to half of all municipalities in Quebec.</li> </ul>	While municipalities are responsible for service delivery, provincial standards govern service standards and quality.	The Emergency Communication Centres Act empowers the Quebec government to establish standards for primary and certain secondary PSAPs. All PSAPs are also required to obtain Certificate of Compliance issued by the Ministry of Public Safety.	A 911 levy of \$0.54 per month on landline, cell and IP phones covers part of the cost, with the remaining expenses funded by municipalities. The levy is managed by l'Agence municipale de financement et de développement des Centres d'urgence 9-1-1 du Québec, a non-profit organization, to ensure equitable fund distribution to PSAPs.	All PSAPs are mandated to implement dual-level backup system. In case of primary backup centre is unable to process rerouted calls, an additional backup system must be readily available.
 <b>Saskatchewan</b>	1.1M	577K	<ul style="list-style-type: none"> <li>The Crown corporation, Saskatchewan Public Safety Agency (SPSA) operates one PSAP centre, with a second one set to begin operations next year. It provides primary PSAP services, as well as fire and police dispatch.</li> <li>SPSA also contracts with two municipality-run PSAPs (Saskatchewan Police and Regina Police) to provide 911 call answering service in the province. These PSAPs also offer police and fire dispatch services, while secondary PSAP functions are governed at the local level.</li> </ul>	SPSA governs its own PSAP centre and contracts with two municipality-run PSAPs to provide primary PSAP services. Police and fire dispatch are governed by local governments.	SPSA governs its own PSAP centre. It contracts with the two municipality-run PSAPs to set requirements for primary PSAP services via service contracts.	A 911 levy of \$2.17 per month on landline and cell phones funds primary PSAP functions and subsidizes police and fire dispatch costs. Local governments pay a user fee for fire and police dispatch services.	Three primary PSAPs back each other up; if one site is busy or needs to evacuate, calls will roll over to the other PSAPs.




Table 9: Canadian jurisdictions summary<sup>3</sup>




<sup>3</sup> Ambulance services and PSAPs operated directly by federal or provincial agencies (e.g., RCMP) are not included in the jurisdictional comparisons.

**International landscape**

Across the globe, centralized or consolidated primary PSAPs is common, fostering improved interoperability, standardization of protocols, and operational efficiency. For instance, emergency calls in the United Kingdom are answered by one of seven call handling centers operated by a telecommunications company. Similarly, in New Zealand and Australia, emergency calls are first answered by telecommunications companies that provided centralized primary PSAPs services.

Many international jurisdictions are actively adopting artificial intelligence (AI) and advanced technologies to enhance call handling efficiency and situational awareness. Technologies such as automated call triage systems and real-time data sharing applications are being utilized to streamlines operations or improve decision-making.

Jurisdiction	Population	Size (km2)	Overview	Lessons Learned
 Oregon, US	4.2M	255K	<ul style="list-style-type: none"> <li>Local delivery with state coordination: 43 PSAPs covering 36 counties, operated locally under coordination from the State 911 Program, overseen by the Oregon Department of Emergency Management (OEM) .</li> <li>Governance includes a PSAP Advisory Committee, with the OEM responsible for setting PSAP operations, equipment standards, mapping and funding oversight.</li> <li>Funding is supported by an Emergency Communication Tax of \$1.25/month for each phone line or 911-capable device, with a state-managed account that funds PSAP operations, infrastructure, training and NG911 transition.</li> </ul>	<ul style="list-style-type: none"> <li>Centralized operations hub: In Portland, the Bureau of Emergency Communications (BOEC) serves as a centralized call-taking and dispatch center under the Public Safety Division Deputy City Administrator of the Portland government, consolidates call taking and dispatch across multiple police, fire and EMS agencies in the Portland metro area, improving interoperability and standardizing protocols.</li> <li>Use of AI technology: Voicebot answers the call, ask short triage questions, and routes the caller to other resources or connect the caller to a live call taker if it sounds like a real public safety matter, reducing hold times for critical calls and alleviating pressure on call-takers.</li> </ul>
 Texas, US	31M	696K	<ul style="list-style-type: none"> <li>Local delivery with state coordination: A state agency, the Commission on State Emergency Communications (CSEC), set directions and technology standards, develops funding formulas, and distribute grants to local and regional 911 agencies. It also oversees the statewide migration to NG911, ensuring compliance with federal and industry standards (NENA i3).</li> <li>Regional and county-level agencies operate PSAPs, supported by local funding and governance.</li> <li>Funding for these operations includes a 911 fee of \$0.5/month for each phone line (landline, mobile, VoIP) and a 1% intrastate long-distance surcharge. These fees are collected and distributed by CSEC to local areas based on population and service needs.</li> </ul>	<ul style="list-style-type: none"> <li>Multi-agency operations hub: In Austin-Travis County, the Combined Transportation, Emergency, and Communications Center (CTECC) brings 911 and 311 call-taking, emergency dispatch (EMS, police and fire), and transportation operations together under one roof. This co-location enhances coordination and real-time information sharing, also eliminates unnecessary overlaps in staffing, equipment, and procedures.</li> </ul>
 Washington, US	7.8M	185K	<ul style="list-style-type: none"> <li>Local delivery with state coordination: The Washington Military Department's Emergency Management Division, which houses the state 911 office, manages NG911 infrastructure, funding and standards, while 78 PSAPs operated by counties and municipalities handle call-taking and dispatch services across all 39 counties.</li> <li>A statewide 911 excise tax of \$0.95/month for each wireline, wireless, VoIP and prepaid wireless service funds infrastructure, PSAP support, modernization, training and public education.</li> </ul>	<ul style="list-style-type: none"> <li>Civilian-led primary PSAP with specialized service model: In 2021, the Seattle 911 call center transitioned from the Police Department to the civilian-led Community Assisted Response &amp; Engagement (CARE) Department to handle all 911 police calls, manages non-emergency calls, while the Seattle Fire Department operates as a secondary PSAP handling fire and ambulance dispatch, enabling specialized service delivery.</li> <li>AI-assisted dispatch: The Seattle Fire Department partners with Corti.ai to provide real-time AI support during emergency medical calls. AI suggests questions and identifies critical symptoms, enhancing dispatcher decision-making and response accuracy.</li> </ul>

Jurisdiction	Population	Size (km2)	Overview	Lessons Learned
 Denmark	6M	43K	<ul style="list-style-type: none"> <li>▪ <b>National coordination:</b> The Danish Emergency Management Agency under the Ministeriet for Samfundssikkerhed og Beredskab (Ministry of Resilience and Preparedness) oversees the national 112 system, while five regional healthcare authorities manage Emergency Medical Coordination Centres (EMCCs).</li> <li>▪ All 112 calls are routed initially to police call centres (except in Copenhagen, where calls first go to the Copenhagen Fire Brigade). Police triage calls and forward medical emergencies to the appropriate EMCC.</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>Live Video Streaming from Caller:</b> EMCCs can request that callers live-stream video from their smartphones via an SMS link to improve situational awareness and response.</li> </ul>
 Netherlands	18M	37K	<ul style="list-style-type: none"> <li>▪ <b>National coordination:</b> The Landelijke Meldkamer Samenwerking (LMS) is the national dispatch network managed by the Dutch National Police under the Ministry of Justice and Security. LMS ensures a permanent PSAP network, system continuity, unified protocols, shared Information and Communication Technology and coordinated risk management.</li> <li>▪ The country has transitioned from 25 regional dispatch centres to 10 regional PSAPs, each handling police, ambulance and fire calls. Call-takers triage and transfer incidents to dedicated call handlers for each discipline.</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>System redundancy:</b> The 10 regional PSAPs operate as a single virtual dispatch system, enabling automatic call transfer if one centre becomes overloaded or fails.</li> <li>▪ <b>Enhanced caller engagement via mobile application:</b> The 112NL App allows users to call 112, send personal details and emergency type, automatically share location and exchange chat messages with control rooms for faster, more accurate response.</li> </ul>
 United Kingdom	69M	244K	<ul style="list-style-type: none"> <li>▪ <b>National call-handling and oversight:</b> Emergency calls to 999 or 112 are prioritized by communications providers and routed to one of seven BT Plc (telecommunication company) call-handling centers. Calls are then transferred to the appropriated emergency service control rooms (142 local centres) serving police, ambulance, fire, and coastguard services based on automatic location data.</li> <li>▪ Ofcom regulates telecom aspects through the General Conditions of Entitlement, while technical and operational oversight is provided by the 999-112 Liaison Committee under the Department for Science Innovation and Technology (DSIT).</li> </ul>	<p><b>In 2023, BT experienced a major emergency call handling failure due to software flaws and inadequate failover systems, key lessons learned from this incident include:</b></p> <ul style="list-style-type: none"> <li>▪ Addressing software update flaws and enhancing failover system to improve resilience.</li> <li>▪ Strengthening escalation protocols for fast notification of emergency services, government and the public.</li> <li>▪ Developing clear, unified public messaging for effective crisis communication.</li> <li>▪ Conducting regular multi-agency resilience exercises to improve preparedness.</li> <li>▪ Auditing vendor risks and diversity technology dependencies to reduce vulnerabilities from reliance on a single provider.</li> </ul>



Jurisdiction	Population	Size (km2)	Overview	Lessons Learned
 Victoria, Australia	7M	227K	<ul style="list-style-type: none"> <li>▪ <b>National and state emergency call coordination:</b> Triple zero (000) calls are initially answered nationally by Telstra, a telecommunications company. Calls requiring emergency services in Victoria are transferred to Triple Zero Victoria (TZV), which is responsible for call-taking and dispatch for police, fire, ambulance and state emergency services.</li> <li>▪ The Australia Communications and Media Authority (ACMA) regulates the national 000 service. Each state and territory maintains its own emergency service organizations.</li> </ul>	<p>Victoria recently reformed its Triple Zero system by establishing TZV as a statutory authority with enhanced governance and funding frameworks. Key lessons learned from this transformation:</p> <ul style="list-style-type: none"> <li>▪ Strong oversight and clear governance frameworks are essential for enhancing accountability and improving operational performance.</li> <li>▪ A skilled and diverse board is necessary to provide effective strategic leadership and ensure community interests are represented.</li> <li>▪ Combining stable state funding with supplementary revenue sources supports financial stability and the development of technical expertise.</li> </ul>
 New Zealand	5.3M	268K	<ul style="list-style-type: none"> <li>▪ <b>Centralized emergency call service:</b> The 111 emergency is centralized, with all calls initially answered by Spark NZ, a telecommunications company, before being forwarded to the relevant emergency service provider (police, fire and ambulance). This approach ensures standardized service across the country.</li> <li>▪ The Ministry of Business, Innovation and Employment (MBIE) regulates the service, with operational responsibilities governed by the Telecommunications (Emergency Call Service) Code 2020 and oversight by the Telecommunications Forum (TCF).</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>Automated call routing:</b> Spark NZ employs an automated system to triage calls exceeding a 45-second wait, with full activation capabilities as needed to supplement human operators.</li> <li>▪ <b>Resilient communications centres:</b> New Zealand Police operates five communication centres with business continuity plans and backup capabilities, enabling mutual support during disruptions.</li> </ul>

Table 10: International jurisdictions summary

## Appendix D: Overview of levies

Business Line	Levy			Levy Category
ECLMD Police	Dispatch Levy	Dispatch Facility & Related Levy		Operations
Fire Dispatch				
ECVI Police				
Radio	Radio Levy	Remote Dispatch Levy	User Equipment Levy	Radio
911 PSAP	911 Call Taking Levy			911 PSAP
Fire CAD	CAD Levy	CAD User Equipment Levy		Fire CAD <i>(part of Fire Technology in new Pricing Model)</i>
Fire RMS	RMS Revenue Levy			Fire RMS <i>(part of Fire Technology in new Pricing Model)</i>

Figure 25: Levy types

### 1. Radio levies

- **Radio levy:** Recover costs for operating and maintaining the public-safety radio network, including 65% of not directly assigned corporate costs.
- **Remote Dispatch Levy:** Cover costs for agency-specific remote dispatch equipment (e.g., consoles) and associated licensing fees for agencies managing their own dispatch.
- **User Equipment (UE) Levy:** Fund agency-specific equipment purchases (e.g., radios, hardware), licensing fees, and interest costs for borrowed funds.

### 2. Operations and 911 levies

- **Dispatch levy:** Business Line costs are allocated based on historical proportions as a **dispatch levy**, covering dispatch, call-taking, and transcription. These levies are charged to:
  - **ECLMD Police:** Police Communication Operations for the **Lower Mainland**.
  - **ECVI Police:** Police Communication Operations for **Vancouver Island**.
- **Dispatch facility and related levy:** Levy covering facility cost increases with growth capped by contract. Business Line costs are allocated based on historical proportions in combination with the dispatch levy charged to **ECVI - Police** only.
- **911 PSAP:** 911 call taking levy that covers call-answering and down-streaming activities, historically based on staffing and operational costs. Starting in 2024, Business Line costs are allocated using call volumes as a key factor.
- **Fire dispatch:** Consolidated levy for Fire Communication Operations (FCO) including fire dispatch and related services. A new model was implemented in 2024 to allocate Business Line costs to funding agencies.

### 3. Other levies or revenue sources

- **Next-Generation 911 (NG911):** The Province of B.C. allocated \$90 million in March 2023 to support the implementation of NG911 technology, transitioning 911 calls to a digital network. Ongoing funding post-implementation (from January 1, 2027) will be the responsibility of funding agencies unless the Province continues funding. Shared E-Comm employees contribute to the program and allocated to program budgets for separate tracking and monitoring. Contractually, any unspent funds must be returned to the Province by the end of 2026.
- **Fire technology:**
  - **Fire Computer-Aided Dispatch (CAD):** Funded by participating agencies through a cost-sharing model based on the number of firehalls and CAD events. The Fire Technology Management Committee (FTMC) oversees this service, and there are dedicated reserves for future projects and equipment.
  - **Fire Records Management System (RMS):** Similar funding and structure as FireCAD, based on firehalls and RMS events. The FTMC also governs this service, with dedicated reserves for upgrades and improvements.
- **HealthLinkBC (HLBC):** E-Comm provides essential IT services to HLBC, with costs calculated from Technology Services and overhead allocations. HLBC is considering a shift to cloud-based services, which may impact E-Comm's staffing and finances.
- **PRIMECorp:** E-Comm offers shared technology services to PRIMECorp, with historical cost allocations that may not accurately reflect actual service delivery. Efforts are underway to better understand resource requirements.
- **BC Emergency Health Services (BCEHS):** E-Comm supports BCEHS with telecommunications technology, with costs similarly calculated from Technology Services and overhead allocations.

## Appendix E: Year-over-year service level results

The following table presents the service levels from 2017 through 2024, as well as data for the first quarter of 2025.

Call type	Target	2017	2018	2019	2020	2021	2022	2023	2024	1Q 2025
911	95%/5s	98%	98%	97%	98%	92%	98%	98%	98%	98%
Police Emergency (EMLMD)	88%/10s	84%	82%	81%	86%	83%	85%	89%	90%	93%
Police Non-emergency (EMLMD)	80%/180s	69%	67%	61%	67%	55%	44%	63%	80%	89%
Police Emergency (ECVI)	88%/10s	-	-	79%	88%	90%	88%	88%	91%	92%
Police Non-emergency (ECVI)	80%/180s	-	-	68%	81%	87%	79%	80%	81%	87%
Fire Emergency	90%/15s	92%	89%	87%	92%	90%	88%	93%	94%	97%

Note: No data available for ECVI for 2017 and 2018, as it commenced operations in 2019.

Table 11: E-Comm's call answer service levels from 2017 to 1Q2025

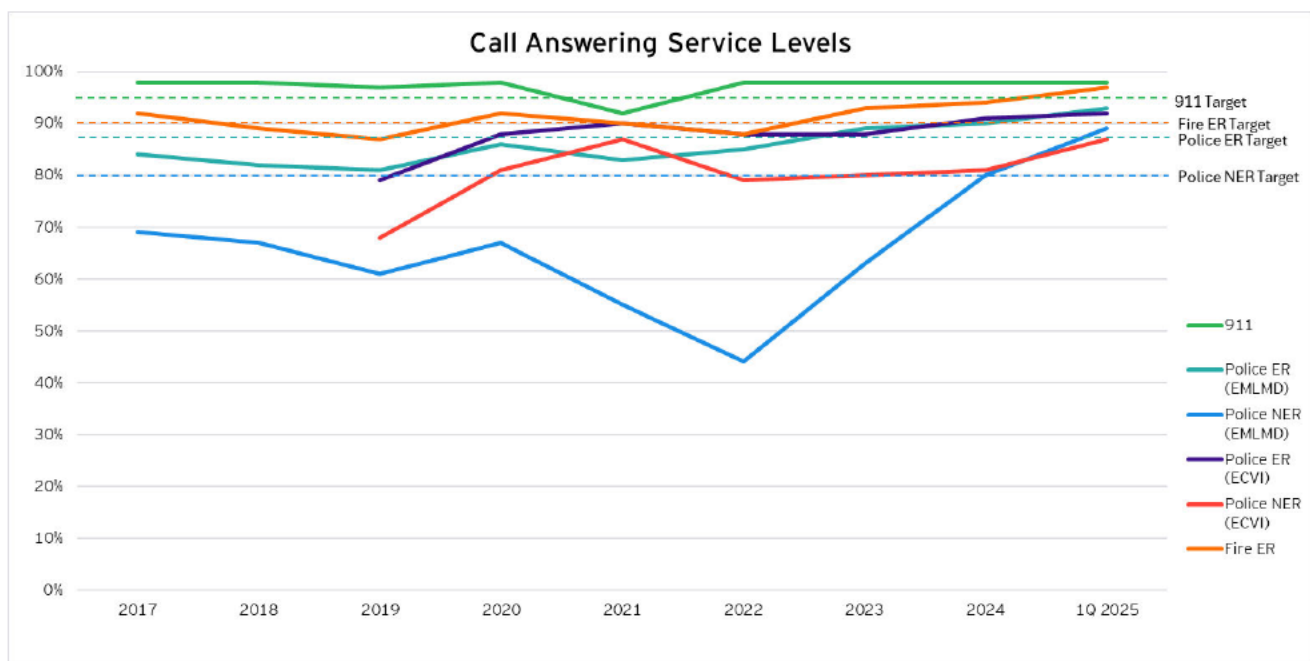


Figure 26: E-Comm call answer service levels from 2017 to 1Q2025

## Appendix F: Overview of financial structure

Overview of E-Comm's financial structure	
<b>Revenue generation</b>	E-Comm generates revenue primarily through levies charged to funding agencies, which include municipalities and other service providers. These levies are calculated based on the costs associated with providing services, including direct operational costs and allocated corporate expenses.  Levies are invoiced quarterly based on an annual estimate determined as part of the budgeting process. Revenue is recognized monthly.
<b>Expense structure</b>	The cost structure comprises direct costs incurred in front-line operations (e.g., salaries and benefits for staff, technology maintenance, and other operational expenses) and corporate costs that support the overall functioning of the organization. Corporate costs are allocated to Business Lines to ensure they are recovered from funding agencies through levies.
<b>Budgeting process</b>	E-Comm employs a bottom-up budgeting approach, engaging stakeholders and funding agencies to gather feedback before finalizing the budget. This collaborative process is crucial for aligning financial planning with operational needs and strategic objectives. E-Comm has historically presented only a one-year budget view and is moving towards creating 5-year forecasts.  E-Comm finalizes its budget and associated levies in November each year
<b>Capital funding</b>	Capital expenditures are primarily funded through Radio levies, based on historical practices and understanding of the Members' Agreement. Capital costs are budgeted annually on a cash basis.

Table 12: Overview of E-Comm's financial structure

### Overview of financial flow process

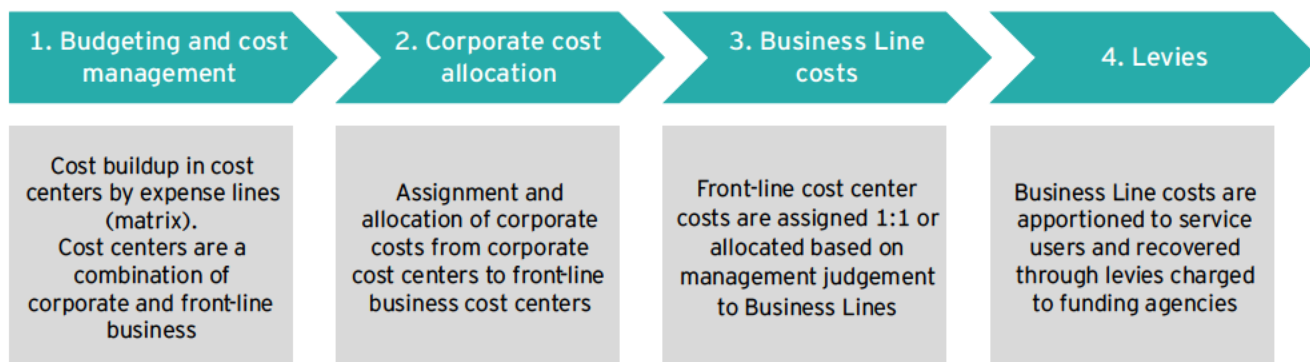


Figure 27: High-level flow of processes from budgeting through to levies

1. **Budgeting and cost management:** Costs are incurred or budgeted by expense line in individual cost centers (CC) to form a matrix of costs by line-item type and cost center (e.g. salaries and benefits in Operations cost centers). A large portion of budgets are based on Full-time equivalent (FTE) and salary projections.
2. **Corporate cost allocation:** Corporate cost center costs are allocated to front line business cost centers as it is these costs that flow to Business Lines (Step 3) and ultimately to funding agencies (Step 4). Corporate cost assignment and allocation is currently performed in two steps:
  - a. A portion of salaries and benefits expenses is assigned directly to Business Lines as it is known how some corporate staff spend their time; these expenses go to the appropriate natural expense line and Business Line (e.g., salaries and benefits in ECLMD Police).

- b. The balance of corporate costs is allocated via an “internal allocations” expense line item with a 65:35 ratio to Radio and two of the three Operations Business Lines. Corporate costs are allocated between these two Business Lines, ECLMD Police and ECVI Policy, using historical proportions, but the rationale for using these proportions is no longer known. Currently, no corporate costs are allocated to the Fire Dispatch Business Line, also for unknown historical reasons.
3. **Business Line costs:** The costs of some front-line cost centers are assigned 1:1 to Business Lines. Other front line cost centers, where 1:1 mapping is not applicable (particularly in Operations), are allocated to Business Lines using FTE estimates and their associated salaries and benefits expenses.
4. **Levies:** Business Line costs are apportioned to clients/funding agencies to be recovered in the form of levies charged. Levies are calculated and charged based on budgeted operating and capital costs, without true-up to actuals, such that budget-to-actual variances result in a surplus or deficit for the applicable Business Line.

## Appendix G: Budget variance analysis

Expense variances were reviewed in two separate ways: by expense category, and by cost center category. The variance analysis excludes internal allocations, and the costs associated with NG911.

The summary tables below show each expense category and CC category (excluding “Others” for both views, and Radio for the CC view), its proportion of total actual expenses from 2020-2024, consistency of variance, and the variance range.

The terms used to define consistency are as follows:

- Consistent - same direction of variance for all years, low magnitude
- Consistent\* - same direction of variance for all years except one
- Inconsistent - high variances in both directions, or all in the same direction but growing in magnitude
- Inconsistent\* - high variances observed, with decreasing magnitude in recent years

Expense category	% of total actual expenses 2020-2024)	Consistency of variance	Variance range	Notes
Salaries & Benefits	73%	Inconsistent	-5% to 4%	Variances have been positive and negative. Low variance percentage but high impact due to large expense proportion.
Maintenance & Technology	7%	Inconsistent	1% to 15%	Always over budgeted, variance percentage increasing from 2020-2024.
Amortization	6%	Consistent	0% to 10%	Always over budgeted, variance relatively stable over the years.
Premises	4%	Consistent*	-8% to 9%	Over budgeted for all years except 2023 (-8%).
Professional Fees	2%	Inconsistent	-24% to 29%	Large positive and negative variance percentages.
Employee Related	2%	Inconsistent*	1% to 13%	High variance percentages in 2020 and 2021, improving from 2022 onwards.

**Table 13: Variance scoring by expense category 2020-2024** (Source: EY based on E-Comm data)

CC category	% of total actual expenses 2020-2024)	Consistency of variance	Variance range	Notes
911	7%	Consistent	0% to 4%	Low variances every year.
Operations	51%	Inconsistent	-9% to 5%	Variances have been positive and negative. Relatively low variance percentage but high impact due to large CC expense proportion.
Operations - Training	2%	Inconsistent	-29% to 22%	Large positive and negative variance percentages.

Corporate	8%	Consistent*	-4% to 7%	Over budgeted for all years except 2023 (-4%).
Corporate - IT	4%	Inconsistent	5% to 26%	High positive variances for all years (lowest was 5% in 2022).
Corporate - Facilities	3%	Consistent*	-4% to 4%	Positive and negative variance percentages, low magnitude and low impact.
Fire Technology	2%	Inconsistent*	6% to 24%	High variance percentages in 2020 and 2021, improving from 2022 onwards.

**Table 14: Variance scoring by CC category 2020-2024 (Source: EY based on E-Comm data)**

(\$ 000s)	2024			
	Budget	Actual	Variance	Variance %
Salaries & Benefits	101,176	97,143	4,033	4%
Maintenance & Technology	11,326	9,673	1,653	15%
Amortization	7,224	6,496	728	10%
Premises	5,462	4,982	480	9%
Professional Fees	4,811	3,422	1,390	29%
Employee Related	2,168	2,088	80	4%
Others	3,664	4,332	-668	-18%
<b>Total expenses</b>	<b>135,832</b>	<b>128,136</b>	<b>7,695</b>	<b>6%</b>

**Table 15: Budget vs. actual variances by expense category 2024 (Source: EY based on E-Comm data)**

(\$ 000s)	2024			
	Budget	Actual	Variance	Variance %
911	8,995	8,914	80	1%
Operations	68,317	64,865	3,451	5%
Operations - Training	3,874	3,696	178	5%
Radio	20,592	19,623	969	5%
Corporate	12,281	11,462	818	7%
Corporate - IT	9,224	8,113	1,111	12%
Corporate - Facilities	3,342	3,191	150	4%
Fire Technology	3,318	3,108	210	6%
Others	5,890	5,163	727	12%
<b>Total expenses</b>	<b>135,832</b>	<b>128,136</b>	<b>7,695</b>	<b>6%</b>

**Table 16: Budget vs. actual variance by CC category 2024 (Source: EY based on E-Comm data)**

**2024 Surplus**

EY analyzed E-Comm's accumulated earnings (deficit) from 2020-2024 to review how it has changed over time and to understand of the impact of the 2024 surplus of ~\$9M.

As per E-Comm audited financial statements, there was accumulated earnings of ~\$0.5M at the end of 2019. From 2020-2023, E-Comm faced an annual deficit every year, bringing their accumulated deficit to \$7M at the end of 2023. While E-Comm had positive earnings of ~\$9M in 2024, their accumulated earnings at the end 2024 stood at ~\$1.9M. This is shown in the image below.

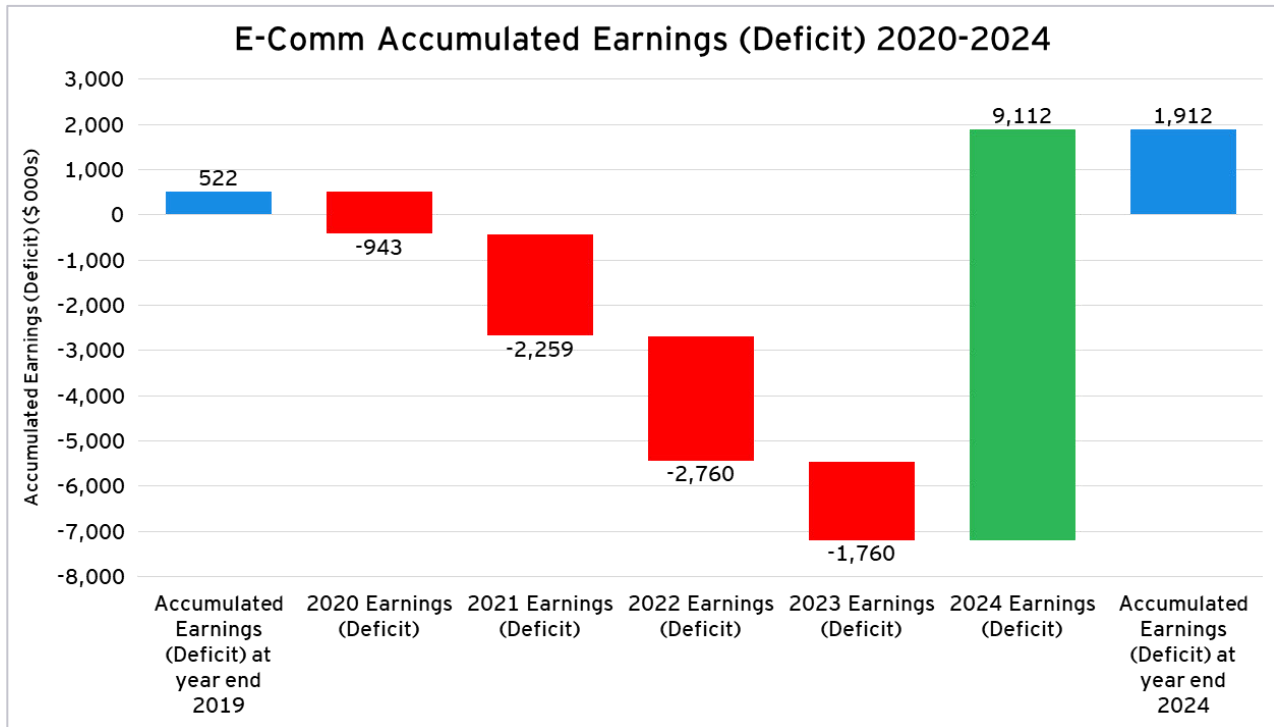


Figure 2827: (Source: EY based on E-Comm data)

To understand the implications of the accumulated earnings (deficit), EY compared the amounts with E-Comm's total annual budgeted expenses (excl NG911). The analysis showed that from 2020-2024, E-Comm's accumulated earnings (deficit) as a % of total budgeted expenses ranged from a low of -6.4% in 2023 to a high of 1.4% in 2024. During 2020-2022, E-Comm's accumulated earnings (deficit) as a % of total budgeted expenses were -0.5%, -3.1% and -5.5% respectively.

## Appendix H: Budgeting and forecasting process assessment

Below are some leading practices for Public Sector organizations budgeting, along with some commentary on how E-Comm’s process compares:

Leading practice	E-Comm practices
<p><b>Organization-wide long-term vision</b> - Long-term visions articulate a high-level view of the ideal future state vision of the jurisdiction.</p>	<p>Given the way E-Comm has evolved as an entity over the years, it does not appear to have a recent strategic vision that articulates the view of the future state of the organization. E-Comm’s vision per their 2018 strategic plan is “Safer communities in British Columbia through excellence in public safety communications”.</p>
<p><b>Long-term financial planning</b> - Entities engage in long-range financial planning, aligning financial capacity with long-term service objectives. Plans identified have produced forecasts for a time horizon between five to ten years. It serves as the financial guidelines and principles for corporate strategic plans and budgets.</p>	<p>E-Comm has started to prepare longer term forecasts, presenting a five-year forecast to the Board in April 2025.</p>
<p><b>Corporate strategic plan</b> - Corporate strategic plans identify and prioritize the objectives a single council or mayoral term aims to achieve. Priorities are informed by long-term strategic objectives and public consultation.</p>	<p>E-Comm does not prepare an annual strategic plan update making it challenging to determine where the organization stands against its intended outcomes. The existing strategic plan does not outline any targets or metrics that would support assessment of progress against plan or financial planning.</p>
<p><b>Multi-year budgets</b> - Development and formal adoption of budgets and services plans that span the term of council (generally 4 years) with approval at onset of term and adjustments occurring in the remaining years</p>	<p>E-Comm has started to prepare longer term forecasts, presenting a five-year forecast to the Board in April 2025. For future years, E-Comm expects to take a longer timeframe budget (multiple years) to present to its stakeholders.</p>
<p><b>Budget planning structure</b> - Ownership of the budget process and the structure of the owning entity varies across jurisdictions, with jurisdictions creating structures to reflect their unique operations; as jurisdictions shift focus to multi-year or service-based budgets, typically, budget planning structure shifts as well.</p>	<p>The Finance team owns the budgeting and forecasting process and provides input and budget guidance to cost center owners along with a challenge and debate function.</p>
<p><b>Service-based budgets</b> - Jurisdictions are generally moving away from traditional budgets (focused on internal divisional structures over a single year horizon) to multi-year service-based budgets.</p>	<p>E-Comm still budgets based on a divisional and cost center structure rather than preparing service-based budgets that would closely align with services offered and facilitate discussion with funding agencies.</p>

Table 17: Leading Public Sector organization budgeting practices and comparison

## Appendix I: Expense growth

E-Comm's total expenses have increased at a CAGR of 14.3% from 2020-2024. The annual expense growth per year was 2021: 6%, 2022: 17%, 2023: 23% and 2024: 13%. This growth has been driven by Salaries and Benefits, Employee Related, Maintenance and Technology, and Professional Fees expenses. Tables 18 and 19 below show E-Comm's actual annual expenses by expense category and their growth rates from 2020-2024.

(\$ 000s)	2020	2021	2022	2023	2024	2020-2024 CAGR
Salaries & Benefits	57,317	60,832	69,369	89,352	102,350	15.6%
Maintenance & Technology	5,259	5,668	7,575	9,344	13,910	27.5%
Amortization	6,382	6,237	6,399	6,549	6,496	0.4%
Premises	4,179	4,475	4,201	4,784	5,200	5.6%
Professional Fees	983	1,658	4,772	3,661	4,201	43.8%
Employee Related	1,041	1,145	1,664	2,154	2,255	21.3%
Others	5,591	5,742	6,053	6,819	3,605	-10.4%
<b>Total</b>	<b>80,752</b>	<b>85,757</b>	<b>100,033</b>	<b>122,662</b>	<b>138,017</b>	<b>14.3%</b>

**Table 18: Actual annual expenses by expense category 2020 to 2024 (Source: EY based on E-Comm data)**

	2021	2022	2023	2024	2020-2024 CAGR
Salaries & Benefits	6.1%	14.0%	28.8%	14.5%	15.6%
Maintenance & Technology	7.8%	33.6%	23.3%	48.9%	27.5%
Amortization	-2.3%	2.6%	2.3%	-0.8%	5.6%
Premises	7.1%	-6.1%	13.9%	8.7%	43.8%
Professional Fees	68.7%	187.8%	-23.3%	14.8%	0.4%
Employee Related	10.0%	45.3%	29.5%	4.7%	21.3%
Others	2.7%	5.4%	12.6%	-47.1%	-10.4%
<b>Total</b>	<b>6.2%</b>	<b>16.6%</b>	<b>22.6%</b>	<b>12.5%</b>	<b>14.3%</b>

**Table 19: Annual actual expense growth by category 2020 to 2024 (Source: EY based on E-Comm data)**

E-Comm's total expenses have increased at a 2020-2024 CAGR of 14.3%. This growth has been driven by Salaries and Benefits, Employee Related, Maintenance and Technology, and Professional Fees expenses.

- **Salaries and benefits** accounted for an increasing share of total expenses, rising from **71%** in 2020 to **74%** in 2024, with a CAGR of **15.6% over this period**. This suggests that personnel costs are a major driver of overall expense growth. According to E-Comm, increased staffing costs are driven by collective bargaining agreement wage adjustments and additional capacity requirements to improve and maintain service levels. This includes staffing to support the addition of a new service user for Police ER and NER in 2024. Staff retention initiatives since 2020 include expanding wellness and

mental health support, enhancing career and leadership development opportunities and increasing efforts to promote diversity, inclusion and sense of belonging.

- Investments in E-Comm’s Transformation Plan that intend to enhance operational capacity, technology resilience, and internal efficiencies, also contributed to overall expense growth as these initiatives require funding. These investments have impacted specific expense line items including:
  - **Maintenance and technology expenses** exhibited a **4-year CAGR of 27.5%**, reflecting E-Comm's investment in technological advancements and infrastructure per the Transformation Plan.
  - **Professional fees** saw a **CAGR of 43.8%** from 2020 to 2024, indicating a growth in reliance on external services, primarily consultants as part of ongoing reviews and transformation and expertise in recent years.

To put this expense growth into context, annual growth rates in BC Macroeconomic factors from 2020-2024 are shown below in Table 20.

Factor	2021	2022	2023	2024	2020-2024 CAGR
BC CPI All Items <sup>4</sup>	2.8%	6.9%	3.9%	2.6%	4.1%
BC Avg. Weekly Wage <sup>5</sup>	4.2%	4.9%	6.4%	5.2%	5.2%
BC Population Growth <sup>6</sup>	2.1%	2.9%	3.4%	1.7%	2.6%

Table 20: Macro-economic factor growth 2020 to 2024

E-Comm budgets and records expenses incurred by expense category in its 31 cost centers (CC) which are classified into five different types of CCs namely 911, Dispatch, Radio, Corporate and Others as shown below.

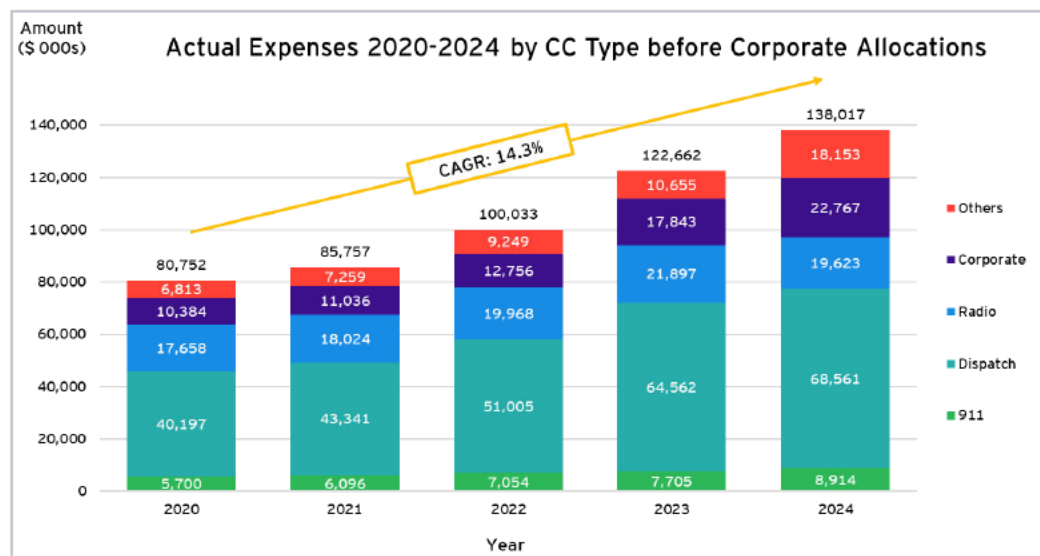


Figure 28; E-Comm actual annual expenses by CC type 2020 to 2024 (Source: EY based on E-Comm data)

<sup>4</sup> CPI: Statistics Canada. Table 14-10-0064-01 Employee wages by industry, annual (x 1,000).

<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1410006401>

<sup>5</sup> BC Avg. Weekly Wage: <https://catalogue.data.gov.bc.ca/dataset/466ddecd-2701-4e97-84fb-df60bd5aca95/resource/af13d31f-f6a9-43e5-bc82-834817a0a5e7>

<sup>6</sup> BC Population Growth: Statistics Canada. Table 17-10-0009-01 Population estimates, quarterly.

<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1710000901>

	2021	2022	2023	2024	2020-2024 CAGR
911	7.0%	15.7%	9.2%	15.7%	11.8%
Dispatch	7.8%	17.7%	26.6%	6.2%	14.3%
Radio	2.1%	10.8%	9.7%	-10.4%	2.7%
Corporate	6.3%	15.6%	39.9%	27.6%	21.7%
Others	6.5%	27.4%	15.2%	70.4%	27.8%
<b>Total</b>	<b>6.2%</b>	<b>16.6%</b>	<b>22.6%</b>	<b>12.5%</b>	<b>14.3%</b>

**Table 21: Annual actual expense growth by CC type 2020 to 2024 (Source: EY based on E-Comm data)**

The table below show the budgeted FTE composition within cost center categories “CC Category” (Note: cost centers were grouped into categories for the purposes of this analysis) before allocations (% Total budgeted FTE before allocation), along with the composition following these allocations (% Total budgeted FTE after allocation).

CC category	Before allocation			After allocation		
	2020	2024	2020-2024 CAGR	2020	2024	2020-2024 CAGR
Operations	460	516	2.9%	456	528	3.7%
Operations - Training	10	26	27.3%	9	22	26.1%
911	0	0	-	12	16	8.1%
Radio	20	23	2.7%	26	27	0.4%
Corporate	43	67	12.1%	35	48	7.9%
Corporate - IT	48	88	16.0%	9	29	32.3%
Corporate - Facilities	5	5	0.0%	3	3	0.9%
Fire Technology	6	8	5.5%	9	12	6.5%
Others	4	12	30.9%	37	35	-1.0%
NG911	0	0	-	0	25	-
<b>Total</b>	<b>596</b>	<b>744</b>	<b>5.7%</b>	<b>596</b>	<b>744</b>	<b>5.7%</b>

**Table 22: Budgeted FTE before and after allocations for 2020 and 2024 and growth by CC category (Source: EY based on E-Comm data)**

Two CC categories showed the most significant growth:

- Operations - Training:** This category experienced a CAGR of **27.3%** before allocations and **26.1%** after allocations. This growth suggests an increased emphasis on training and development. This growth may be misleading however as E-Comm has highlighted that training staff were moved from operational cost centers into the Training cost center in 2023/2024.
- Corporate IT costs:** This category experienced a CAGR of **16.0%** before allocations and **32.3%** after allocations, understood to be driven by extensive IT transformation initiatives. The growth in this area aligns with E-Comm's strategic objectives to enhance technological capabilities and improve service delivery.

# Appendix J: New financial model

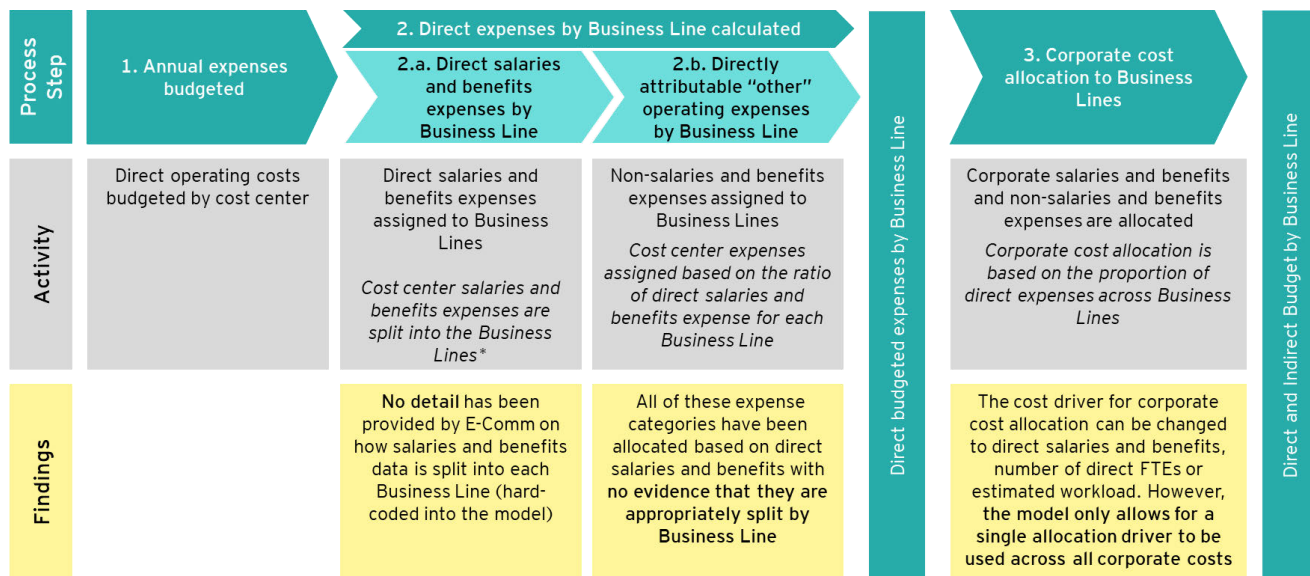
The new model incorporates two key elements:

- **Costing Model** - a potentially revised methodology for recording direct expenditures by cost center so that they can be more closely aligned to Business Lines. This new costing model also includes a new approach to the allocation of corporate expenses, shifting away from the existing manual allocation of FTE expenses followed by the 65:35 split of corporate expenses to Radio and Operations respectively. This costing model is expected to provide an enhanced level of detail and more equitable & transparent allocation of corporate costs to Business Lines.
- **Pricing Model** - The new pricing model leverages and extends the costing model which provides an updated cost of each service/business line to be disaggregated by funding agency, with levies set to recover these costs. The new model will use drivers such as population and call volumes as the basis for setting levies, rather than the historical approach of unchanged percentages by funding agency, as detailed in the Translating costs into levies section.

E-Comm describes the core elements of the new financial model to be “(i) the costing of E-Comm’s operations, (ii) the pricing of the services delivered to shareholders and service contract partners, and (iii) the mechanisms to fund the corporation and its work.”

## Costing model

An overview of the Costing Model and our findings is shown in Figure 30 below. The details that follow provide additional information on the process steps and findings.



**Leading practice, based on EY experience:**

- Each corporate cost expense line should be allocated to Business Lines based on the cost driver that is most relevant to that specific corporate cost (cost drivers for 'People & Culture' may be different from cost drivers for 'IT Security').
- The Costing Model should allow for direct assignment of costs held in corporate cost centers to Business Lines where there is a clear relationship between the cost being incurred and the business line receiving the benefit.
- The Costing Model should have the ability to allow for weighted allocation using multiple cost drivers by expenditure category.

Figure 29: Costing Model overview and findings

Challenge with existing model	Response in proposed Costing Model	EY comments on the effectiveness of the change
<p>Manual effort to directly assign corporate FTE and associated salaries and benefits expenses to front-line business cost centers that they support.</p>	<p>No direct assignment of FTE and associated salaries and benefits expenses from corporate cost centers to Business Lines where there is a direct relationship between the cost being incurred and the business line receiving the benefit.</p>	<p>By excluding any direct assignment of costs, E-Comm is unable to identify a true cost of service delivery. If there were direct assignment of costs, there could be a build-up of direct expenses that are being incurred to deliver a service and hence E-Comm could be in a better position to explain what costs of delivery are.</p>
<p>65:35 split in balance of corporate costs allocated to Radio and Operations based on Board approved decision in 2009.</p>	<p>All corporate expense categories have been allocated using a single methodology. There is no evidence of analysis on whether there may be a more appropriate methodology to assign these expenses by expense category.</p> <p>The model only allows for a single allocation driver to be used across all corporate expense lines and cost centers.</p>	<p>E-Comm is using a simple allocation methodology to split out direct expenses to Business Lines without conducting analysis on what business activities are driving those expenses.</p> <p>Although this is a simple process that can be easily explained, it does not enable clarity into what expenses are being incurred to deliver a service.</p> <p>In the absence of expense traceability, additional drivers could be evaluated by expense line item that may be a better proxy for actual costs than salaries and benefits expenses. Leading practice would allow for a specific driver per expense line item, or a combination of drivers including a percentage weighting for each (e.g. Presidents Office - Total direct expenditure, IT Service desk - Headcount, People &amp; Culture - 50% Headcount and 50% Number of new hires).</p>
<p>Cost-centers do not directly align to Business Lines and there is an allocation step (covered in the Levies section) to translate cost center costs to Business Lines.</p>	<p>The new Costing Model aims for new cost centers aligned to a more granular set of Business Lines (e.g. ECLMD Police would be split out into 911, ER, NER, and CPIC).</p>	<p>The process to assign direct costs to these cost centers appears to be the same as the current allocation method of costs from cost centers to Business Lines, with the exception that there are additional Business Lines.</p> <p>The addition of a more granular set of cost centers by Business Line provides the opportunity for better tracking of financial information, provided the expenses recorded in them are directly related to how they are incurred, and not just an allocation to the cost centers.</p>

**Table 23: Challenges with E-Comm's current costing model and their response with the new Costing Model**

## Costing model process:

### Direct costs – splitting current cost centers into new Business Lines

1. Cost center owners create annual budgets for their direct operating expenses using the process detailed in the Budgeting section of this report
2. Estimated salaries and benefits direct operating expenses from cost centers are assigned to Business Lines for ECLMD Police, ECVI Police and (Radio and Fire Technology are already budgeted at a Business Line level).
  - a. **Business Lines are more granular than the existing model and would add additional cost centers** in the account structure to provide greater financial detail of service expenditures e.g. ECLMD Police broken down by 911, emergency, non- emergency, dispatch and CPIC.
    - i. The intention is to create cost centers for each Business Line, allowing for more precise tracking and reporting of costs and more transparency into the cost of service delivery.
3. Non-salaries and benefits direct operating expenses are assigned to Business Lines for ECLMD Police, ECVI Police and Fire based on each Business Line's proportion of total salaries and benefits from step 2.

The three steps above result in each Business Line having a budgeted direct operating expense upon which corporate costs are allocated.

*Note: It is EY's understanding that E-Comm intends to create new cost centers at a Business Line level to avoid steps two and three detailed above. If detailed analysis is conducted on each Business Line to determine the true direct costs for each, rather than following this allocation methodology, our findings will be void.*

### Corporate cost overhead allocation:

4. Corporate costs are allocated to Business Lines using each Business Line's **percentage of direct operating expenses**.
  - a. **Only one allocation driver** is used by the whole model and is applicable to ALL cost centers, however the model is built to allow for other drivers such as direct salaries and benefits, number of direct FTEs, or estimated workload.

### Impact of Costing Model changes:

Under the proposed Costing Model, there will be financial impacts across Business Lines in terms of how costs are distributed.

- Although the total cost pool does not change, the proportion of costs recovered from each aggregated Business Line changes.
- Operations costs increase significantly with a larger proportion of corporate costs being allocated to Operations than Radio under the new model.

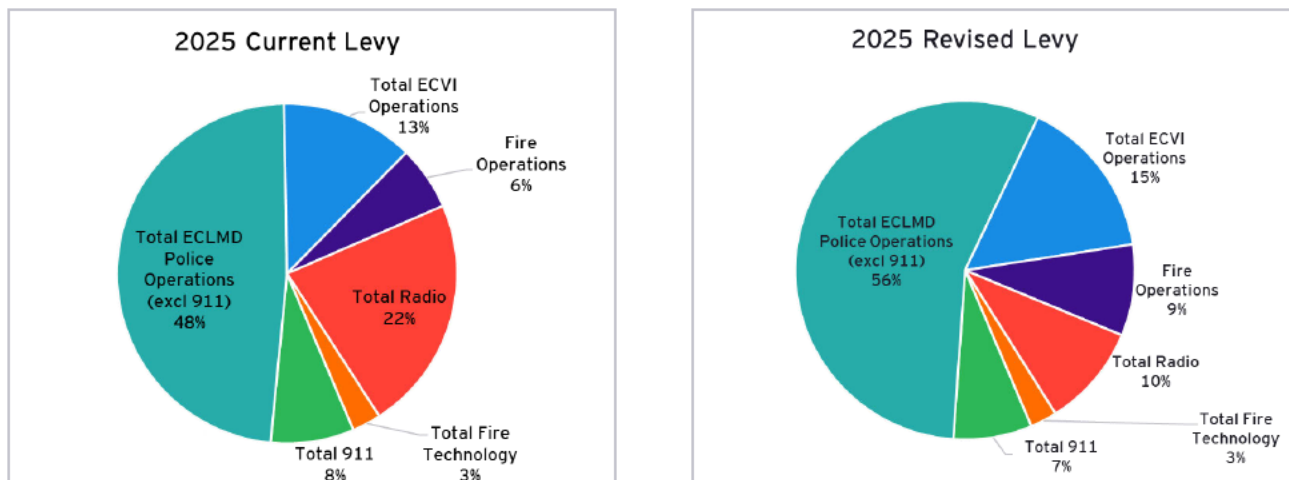


Figure 30: Division of 2025 Levy by aggregated Business Line based on current costing model and proposed Costing Model (Source: EY based on E-Comm data)

**Pricing model**

The new pricing model was developed by E-Comm with the support of external advisors and was based on key principles, including transparency, equity and fairness, accuracy and simplicity, predictability and stability and Business Line pricing. Fundamentally, the pricing model is the process through which levies by funding agency for each Business Line are calculated to recover the budgeted costs per Business Line from these funding agencies.

An overview of the new pricing model and high-level observations are shown in Figure 32 below.

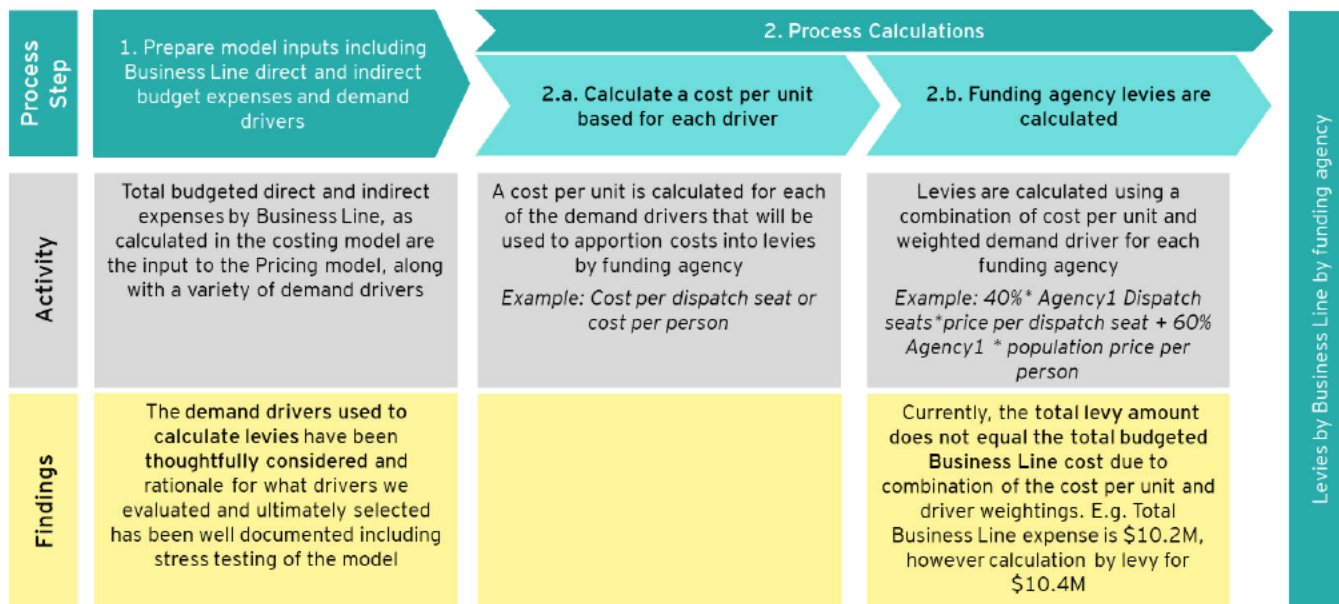


Figure 31: Pricing Model overview and findings

Challenge with existing model	Response in proposed Pricing Model	EY comments on the effectiveness of the change
Levies are allocated based on a <b>historical allocation proportion basis</b> .	The allocation of levies to funding partners is driven by <b>demand factors</b> (e.g. call volumes within each	The proposed Pricing Model is an improvement on the existing cost recovery model. Funding agencies will be better able to understand how the consumption of

	municipality - costs allocated by % of overall calls - based on historical average volume).	services by their service users translate into levies charged by E-Comm. The drivers selected are defensible and will reflect changing consumption patterns over time.
There is limited <b>traceability of costs incurred in cost centers to levies charged.</b>	The new model attempts to align cost centers to Business Lines more directly and at a more granular level than currently exists. And then allocate those costs to funding agencies on a basis that is clear, documented and tested,	Beyond corporate cost allocation challenges highlighted, the new pricing model provides a clear and defensible bases for apportioning a Business Line cost into levies for each funding agency on a basis that is driven by tested demand factors.
E-Comm does not have the ability to <b>price for differing service levels</b> provided to service users.	The new Pricing Model does not allow for pricing based on service levels as the Costing Model is not designed to enable an understanding of the costs to deliver various service levels.  The only way this would be factored in is through demand drivers such as average handle time or call volume.	No significant change in the model to enable direct pricing for various service levels.

**Table 24: Challenges with E-Comm’s current pricing model and their response with the new Pricing Model**

- 1. Input consolidation:** The Pricing Model consolidates historical demand data (e.g., call volume, CAD volume, average handle time) and budgeted levies by Business Line, focusing on readily available data that serve as proxies for service consumption and cost drivers.
- 2. Cost calculation:** Inputs are used to calculate a cost per unit for each demand driver, utilizing a mix of stable and variable drivers (e.g., call volume and population) to reflect service usage and historical trends, aiming for consistency and predictability in costs for funding agencies.
- 3. Levy calculation:** Funding agency levies are determined by applying a weighted average of historical driver data and the calculated cost per unit, where each Business Line's demand drivers are weighted based on a stress-tested model to derive the final levy for each agency.

Additional observations on the Pricing Model include:

- 1. ECVI Facilities Fee:** ECVI is allocated facilities expenses based on the revised corporate cost allocation, however, is also subject to an additional direct Facilities charge based on current contracting. No adjustment to corporate cost allocation has been made for this direct fee, however there is a reduction in costs to be recovered from ECVI Business Lines amounting to this facilities fee.
- 2. Manual Allocation:** The current costing model manual allocations of directly attributable salaries and benefits expenses to other cost centers based on staffing and resource understanding. This is time

intensive and a potentially subjective process as it is not driven by a foundational methodology, however, follows the principles highlighted in supporting the understanding of a “true” direct cost of service delivery. Removing this process may provide more clarity into the allocations process, and create a simpler process, however, does not support the principles of reducing the corporate cost overhead pool and trying to get an accurate reflection of what it costs to deliver a service in each Business Line.

## Appendix K: Levy growth analysis

Levies grew at a CAGR of 13.2% from 2020 to 2025, which is lower than the overall expense CAGR of 14.3% during the same period. Operations levies are the largest and fastest-growing category, with a CAGR of 17.5%, driven by significant increases in Dispatch Levies (CAGR of 18.2%).

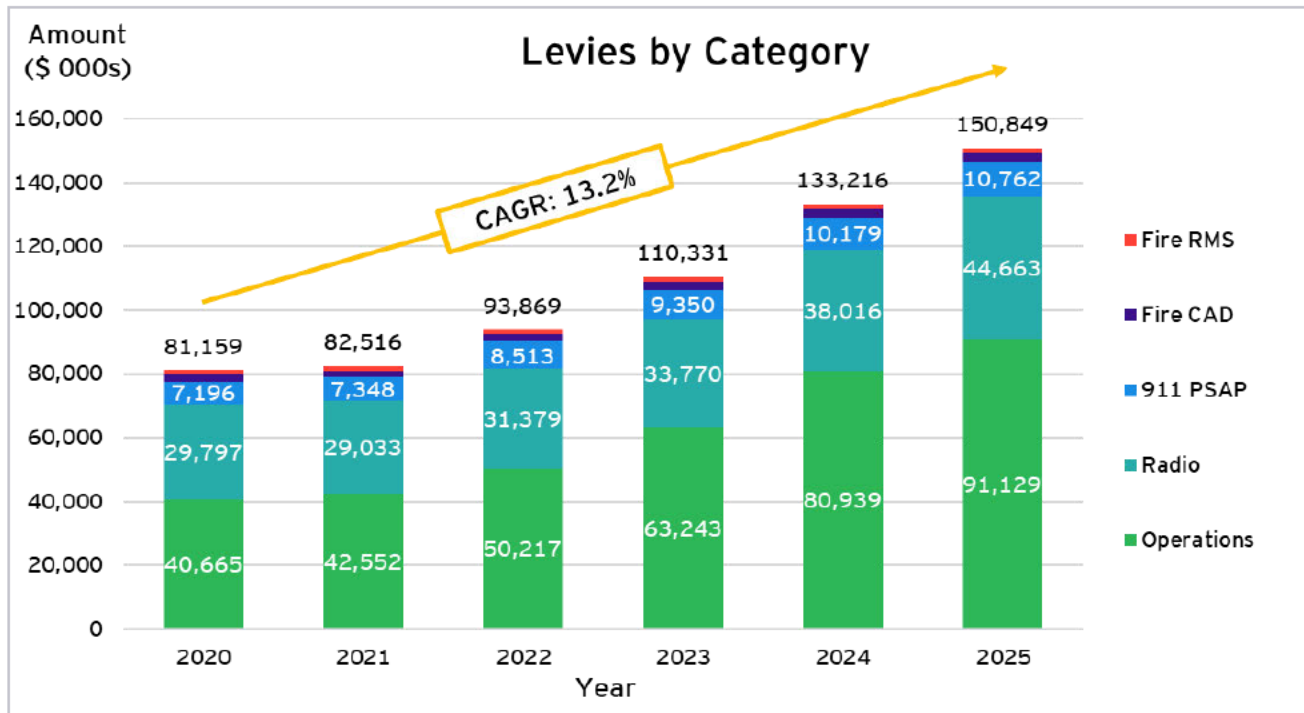


Figure 33: E-Comm total levies by category 2020-2025 (Source: EY based on E-Comm data)

	2021	2022	2023	2024	2025	2020-2025 CAGR
Operations	4.6%	18.0%	25.9%	28.0%	12.6%	17.5%
Radio	-2.6%	8.1%	7.6%	12.6%	17.5%	8.4%
911 PSAP	2.1%	15.9%	9.8%	8.9%	5.7%	8.4%
Fire CAD	1.3%	5.6%	7.0%	4.3%	5.3%	4.7%
Fire RMS	3.9%	4.0%	3.2%	0.7%	5.1%	3.4%
<b>Total</b>	<b>1.7%</b>	<b>13.8%</b>	<b>17.5%</b>	<b>20.7%</b>	<b>13.2%</b>	<b>13.2%</b>

Table 25: Annual levy growth by category 2020 to 2025 (Source: EY based on E-Comm data)

## Appendix L: Resilience framework and assessment

Category	Assessment criteria	E-Comm assessment findings
Technical resilience	<p><b>Power &amp; system redundancy</b></p> <ul style="list-style-type: none"> <li>▪ Ensure console and radio equipment are connected to uninterruptible power supplies (UPS)</li> <li>▪ Availability and functionality of backup generators for power outages</li> <li>▪ Establishment and readiness of a secondary data center</li> </ul>	<ul style="list-style-type: none"> <li>▪ ECLMD, ECVI, and Training Centre (TC) are equipped with backup generators to support operations during power outages which can be sustained for up to 72 hours. Additionally, these sites have Uninterruptible Power Supplies (UPS) that ensure a safe transfer of equipment to emergency power without interruption.</li> <li>▪ E-Comm has a second data center located in Kamloops, which is geographically separated from the primary site in Vancouver to mitigate regional hazards. Following the transition to NG911, the Kamloops data center will be able to support call-taking functions, as well as additional layers of survival sites to strengthen system resilience. However, the secondary data center lacks the capability for police dispatch as the Police CAD system is not yet available there.</li> </ul>
	<p><b>Communication network resilience</b></p> <ul style="list-style-type: none"> <li>▪ Existence of backup paths or redundant rerouting for communication in case of primary system failure</li> <li>▪ Ensure clear procedures are in place for staff to manage call rerouting during emergencies</li> </ul>	<ul style="list-style-type: none"> <li>▪ In the event of a failure, calls can be redirected to the backup site (TC). If TC also fails or is inaccessible, calls can be virtually routed to BCEHS. In cases where no personnel are logged into the 911 system, calls will automatically route to BCEHS. However, this option has not been thoroughly rehearsed, and BCEHS does not factor this into its staffing calculation.</li> <li>▪ There is documentation in place to help identify and troubleshoot system issues and provide guidance on call rerouting.</li> </ul>
	<p><b>Cyber resilience</b></p> <ul style="list-style-type: none"> <li>▪ Existence of threat detection systems and incident response plan</li> <li>▪ Measures to protect against ransomware, including backup strategies</li> <li>▪ Systems for real-time monitoring of network activity</li> <li>▪ Cybersecurity training programs for staff to increase awareness</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ongoing efforts to enhance cybersecurity include training, tracking, simulated phishing exercises, the acquisition of tools and monitoring systems, and the establishment of a dedicated cybersecurity team consisting of 6 to 7 members. Recently, a third-party is being brought to provide continuous monitoring when the internal team is not available.</li> </ul>
Facilities & infrastructure	<p><b>Disaster-hardened facilities</b></p> <ul style="list-style-type: none"> <li>▪ Ensure that facilities are resilient to disasters such as earthquakes, fires, and floods, with secure access</li> </ul>	<ul style="list-style-type: none"> <li>▪ The main site ECLMD is a post-disaster facility, designed to resist an earthquake and to operate self-sufficiently for up to 72 hours following a disaster. However, the backup site, TC, and the newly proposed third emergency communications centre (ECC3) are not.</li> </ul>

Category	Assessment criteria	E-Comm assessment findings
	<p>and seismic-proof infrastructure</p> <p><b>Alternate/ recovery sites</b></p> <ul style="list-style-type: none"> <li>Maintain an operational secondary site with mirrored systems</li> <li>Consider geographic diversity to mitigate risks from threats affecting the primary site</li> </ul>	<ul style="list-style-type: none"> <li>E-Comm has a backup site, TC, but the current redundancy capacity does not fully cover its existing demand during emergencies. A third emergency communication centre is planned to enhance redundancy capacity; however, its location within the Lower Mainland limits geographical diversification. (We will discuss redundancy capacity in more detail later in this section)</li> </ul>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Continuity of operations</p>	<p><b>Business continuity plans and testing</b></p> <ul style="list-style-type: none"> <li>Maintain formal, up-to-date continuity plans that are regularly tested</li> </ul>	<ul style="list-style-type: none"> <li>Currently, there are no formal Business Continuity Plans in place, but E-Comm is in the process of developing these plans and will implement regular exercises to familiarize staff with the procedures. (We will discuss business continuity in more detail later in this section)</li> </ul>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Workforce resilience</p>	<p><b>Surge staffing capacity and support</b></p> <ul style="list-style-type: none"> <li>Evaluate the existence of plans and trained reserves to manage extended or high-volume operations effectively</li> <li>Assess the provision of safe transportation arrangement, adequate sleeping accommodations, access to food and appropriate comfort and hygiene facilities for staff during extended emergency operations</li> </ul>	<ul style="list-style-type: none"> <li>The consolidation of service delivery, along with cross-trained staff, provides flexibility to redeploy personnel from low call volume areas to high-demand areas. E-Comm also has auxiliary staff available to be called in during call surges.</li> <li>However, in the case of a need for extended emergency operations, there are no adequate plans or arrangements in place to support staff with transportation, rest, food, and hygiene needs.</li> </ul>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Emergency preparedness</p>	<p><b>Emergency plans and escalation</b></p> <ul style="list-style-type: none"> <li>Document and train procedures for responding to specific major threats</li> </ul> <p><b>Inter-agency coordination</b></p> <ul style="list-style-type: none"> <li>Establishment of clear roles and responsibilities, with real-time coordination tools, and tested interagency emergency drills</li> </ul>	<ul style="list-style-type: none"> <li>E-Comm currently lacks a comprehensive disaster plan and relies on a collection of procedures used on their intranet site that often require staff to fill in gaps.</li> <li>An evacuation and emergency response plan has been drafted, with training included as part of the business continuity project.</li> <li>BCEHS serves as E-Comm's temporary backup for answering 9-1-1 calls to provide coverage during outages; however, this coordination has not been thoroughly tested in any interagency emergency drills under current conditions.</li> <li>ECVI has a limited arrangement with the RCMP's North Island OCC to cover certain dispatch services.</li> </ul>

Category	Assessment criteria	E-Comm assessment findings
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Communications</p>	<p><b>Crisis information dissemination</b></p> <ul style="list-style-type: none"> <li>▪ Mechanisms for communicating outages with the industry partners, the public and authorities, including alternate access methods</li> </ul>	<ul style="list-style-type: none"> <li>▪ E-Comm has a Crisis Communications Plan outlining the response strategy for different scenarios. It primarily relies on email notifications to industry partners and the provincial government, as well as social media posts and news releases to inform the public. However, there is no direct notification to alerting systems such as BC Emergency Alerts.</li> <li>▪ E-Comm has a backup 10-digital number as an alternate access method during 911 service disruptions. The effectiveness of this measure depends on how clearly and rapidly the number can be communicated to the public.</li> </ul>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Governance and oversight</p>	<p><b>Risk governance</b></p> <ul style="list-style-type: none"> <li>▪ Regularly access risks and prepare for disaster scenarios, with a mechanism to escalate issues to designated authorities if thresholds are exceeded</li> </ul>	<ul style="list-style-type: none"> <li>▪ A formal enterprise risk management process has been developed to evaluate new enterprise risks and rescore existing risks semi-annually. A new Audit and Risk Committee is expected to be established in September 2025 to take on the responsibility of ERM, while the oversight of the identified critical risks will be assigned to each Board committee.</li> <li>▪ E-Comm is currently working on establishing risk tolerance levels, which will be presented to the Board in September 2025 to determine when risks should be escalated to the Board.</li> </ul>
	<p><b>Lessons learned and improvement</b></p> <ul style="list-style-type: none"> <li>▪ Conduct after-action reviews and incident briefings, incorporating continuous updates to plans based on findings, and establish a clear mechanism to follow through on identified improvements</li> </ul>	<ul style="list-style-type: none"> <li>▪ After-action reviews and incident briefings have been conducted, as evidenced by the recent Lapu Lapu Festival incident and the outage incident in March 2024. Currently, this responsibility falls on the Transformation team. A cross-functional working group between the Operations and Technology Services teams will be established once the project is completed to be accountable for updating plans and monitoring continuous improvement.</li> </ul>

*Table 26: Assessment of E-Comm against operational resilience framework*

## Appendix M: Active headcounts by department

The growth of the active headcount by department is illustrated in the table below.

	30-Jun-2020	30-Jun-2021	30-Jun-2022	30-Jun-2023	30-Jun-2024	30-Jun-2025	Growth Rate	CAGR
<b>All Department</b>	530	502	509	596	717	754	42%	7.3%
<b>Corporate Services</b>	49	45	46	60	74	80	63%	10.3%
<b>President's Office and Transformation</b>	4	4	5	4	6	6	50%	8.4%
<b>Data &amp; Analytics</b>					9	13	N/A	NA
<b>Legal &amp; Governance</b>	2	2	2	2	3	4	100%	14.9%
<b>Communications &amp; Public Affairs</b>	6	6	7	6	7	7	17%	0%
<b>Finance</b>	20	21	17	24	25	25	25%	4.6%
<b>People &amp; Culture</b>	12	7	10	19	19	19	58%	9.6%
<b>Facilities</b>	5	5	5	5	5	6	20%	3.7%
<b>Technology Services</b>	74	80	86	92	115	141	91%	13.8%
<b>Operations Mgt, Training and Support</b>	66	59	68	90	103	106	61%	9.9%
<b>Operations Front Line</b>	341	318	309	354	425	427	25%	4.6%

*Note: Active headcount excludes employee status of Auxiliary, Student, LTD, Sick Worksafe Paid, Sick Worksafe Paid (LTD Approved), Sick - WCB Paid Directly To EE By Worksafe, EI Sick, Unpaid Sick Leave, and Pre-Start. Contractors are also excluded.*

**Table 27: Active headcount of E-Comm June 30, 2020 to June 30, 2025.**

## Appendix N: Workforce metrics

### Workforce capacity

E-Comm reports a comparatively low vacancy rate of 3.9% as of June 30, 2025, although a significant portion of workforce is on short- or long-term leave (soft vacancy rate of 10.9%), resulting in only about 85.2% of budgeted positions being staffed with personnel actively performing their duties. Specifically, within the frontline operations, the vacancy rate stands at 2.4%, but soft vacancy rate at 15.5%, resulting in an effective workforce capacity of only 82.1%. While E-Comm' staffing position seems to be stronger than many peers, workforce capacity remains constrained by employee absences. There is an opportunity to improve workforce resilience by implementing targeted strategies to reduce absenteeism and strengthen return-to-work support.

	Sept 2024	Dec 2024	March 2025	Jun 2025
<b>All department</b>				
Total budgeted headcount	1030	1029	1003	997
Active employees (Headcount)	963	974	952	958
Contractor (Headcount)	47	51	39	41
Hard vacancy (Position)	67	55	51	39
Soft vacancy (Headcount)	111	125	104	109
Hard vacancy (%)	6.5%	5.3%	5.1%	3.9%
Soft vacancy (%)	10.8%	12.1%	10.4%	10.9%
<b>Frontline operations</b>				
Total budget headcount	673	663	634	627
Active employees (Headcount)	643	643	621	612
Contractor (Headcount)	0	0	0	0
Hard vacancy (Position)	30	20	21	15
Soft vacancy (Headcount)	100	104	90	97
Hard vacancy (%)	4.5%	3.0%	3.3%	2.4%
Soft vacancy (%)	14.9%	15.7%	14.2%	15.5%

#### Notes:

- *Active employees includes full time, part time and auxiliary employees with the following statuses: Active, Duty to Accommodate, Gradual Return to Work - Sick (Paid or Unpaid), GRTW - WCB & E-Comm Paid, GRTW-WCB & E-Comm Paid (LTD Approved), Job Share, LOA for FT Union Duties, LOA for PT Union Duties, Temporary Accommodation, Sick Leave, STIIP, GRTW - LTD and E-Comm Paid, GRTW & WCB and E-Comm Paid (LTD Approved), Compassionate Care Leave, Sick Leave before Maternity Leave, EI Sick Before Mat Leave. It also includes contractors and employees in soft vacancy status.*
- *Contractors Includes temporary full-Time employee, working on projects with end date in up to two years of employment. Note that contractors that are included in SOWs are not included in the count.*
- *Hard vacancy includes voluntary and involuntary terminated employees and new approved positions.*
- *Soft vacancy status Includes full time, part time and auxiliary employees with the following statuses: EI Sick, Leave of Absence, Long Term Disability, Maternity Leave, Paternity Leave, Sick - WCB Paid Directly To EE By*

*Worksafe, Sick Leave, Sick Worksafe Paid, Sick Worksafe Paid (LTD Approved), STIIP, Temporary Accommodation, Unpaid Sick Leave, Unpaid Worksafe Prelim, Compassionate Care Leave, Sick Leave before Maternity Leave.*

**Table 28: E-Comm 's headcount and vacancy**

### Turnover rate

E-Comm has experienced a notable decrease in its turnover rate, which has dropped to 10% in 2024 from 14% in 2021. This decline signifies a positive trend in staff retention and is significantly lower than the average turnover rate for emergency communication centres in the U.S., reported at 20% in a 2023 survey by NICE, and lower than the turnover rate for Tripe Zero Victoria in Australia during the 2023/2024 period, which was 17%. This data suggests that recent strategic initiatives, including expanding wellness and mental health support, enhancing career and leadership development opportunities and increasing efforts to promote diversity, inclusion and sense of belonging, have been effective in staff retention.

The following table presents the turnover rates of E-Comm from 2021 to 2024.

	2021	2022	2023	2024
Overall	13.6%	15.4%	14.0%	10.2%
Corporate Services	17.9%	18.9%	12.1%	5.8%
Operations	13.5%	16.9%	15.1%	10.5%
Technology Services	12.3%	6.1%	10.1%	7.4%

**Table 29: Turnover rates from 2021 to 2024**

### Employee engagement

E-Comm has initiatives to foster a sense of belonging among call takers and dispatchers, including employer brand and employee value proposition, and efforts focused on inclusion and diversity. The goal is to create a unified identity and improve the overall employee experience. The annual employee engagement survey shows an increase in engagement levels, rising to 61% in 2025 from 41% 2021. The upward trend serves as a positive indicator of staff satisfaction and morale.

The following table presents the results of employee engagement survey from 2021 to 2025.

	2021	2022	2023	2024	2025
Engaged	41%	38%	51%	60%	61%
Neutral	37%	54%	35%	31%	30%
Disengaged	22%	8%	14%	9%	9%

**Table 30: Overall employee engagement from Employee Engagement Survey results 2021 to 2025**

### Overtime rate

Due to staffing issues and increased call volume, E-Comm's call takers and dispatchers were required to work overtime, with the overtime rate for police dispatchers reaching as high as 13% in 2022. The situation has been improving, and this rate has decreased to around 5% in the first quarter of 2025.

The following table presents the overtime rates of E-Comm from 2022 to Q12025.

	2022	2023	2024	1Q2025
911	N/A	1.4%	0.2%	0.1%
Police ER ECLMD	5.7%	4.8%	2.8%	0.6%
Police NER ECLMD	N/A	2.5%	0.9%	0%
Police Dispatch ECLMD	13.0%	12.0%	9.7%	7.4%
Fire ER/NER/Dispatch	N/A	8.7%	5.9%	4.2%
PCT ECVI	7.4 %	8.3%	3.1%	1.3%
Police Dispatch ECVI			6.4%	3.7%

**Table 31: Overtime rate in 2022-2024 and 1Q2025**

**Sick rate**

Absenteeism and the resilience of new employees remain concerns, particularly among dispatchers and police call takers. In 2024, the average sick hours taken by call takers (58 hours/year) and dispatchers (99 hours/year) remained high compared to other departments (22-39 hours/year) within E-Comm. This discrepancy may be attributed to the high-stress nature of their roles. While the high sick rate does not appear to correlate with staff retention, as the turnover rate remains at an acceptable range, it does create productivity issues because frequent absences can disrupt workflow and increase the burden on remaining staff. Careful workforce planning to account for this absenteeism is important.

The following table presents the sick rates of E-Comm from 2022 to Q12025.

	2022	2023	2024	1Q2025
911	N/A	5.3%	6.7%	10.2%
Police ER ECLMD	7.4%	6.3%	11.6.%	10.1%
Police NER ECLMD	N/A	6.6%	7.8%	9.9%
Police Dispatch ECLMD	9.0%	7.9%	7.6%	7.4%
Fire ER/NER/Dispatch	N/A	6.6%	7.6%	8.4%
PCT ECVI	7.2%		8.7%	9.0%
Police Dispatch ECVI		7.3%	7.1%	6.4%

**Table 32: Overtime rate in 2022-2024 and 1Q2025**

**Occupancy**

The occupancy rate is defined as the percentage of time that call-taking staff are actively engaged in handling calls. E-Comm has set occupancy rate targets aligned with industry practices, with consideration to avoid excessively high rates due to the nature of the calls, which require some redundancy and consider the mental health impact on call takers.

E-Comm’s occupancy rates were significantly lower than the target, especially for 911 call taking, primarily because the actual call volume was lower than the forecasted volume. During the initial months of the year, occupancy rates tend to be lower as E-Comm hires additional call takers in anticipation of increased demand during the summer peak period. Consequently, this hiring contributed to the lower occupancy levels recorded in the first quarter of 2025.

During our stakeholder engagement, some stakeholders acknowledged that forecasting call volume is challenging because emergencies are inherently unpredictable. E-Comm has been improving its demand forecasting capabilities with the establishment of the Data & Analytics team. E-Comm now employs data-driven methods and uses forecasting models to predict hourly call volume for different call types by incorporating operational metrics such as occupancy, shrinkage, and average handling time to provide a more accurate estimate of the FTEs.

Having too low occupancy raises concerns about low productivity. There are opportunities to achieve a healthier occupancy rate by further improving demand forecasting such as incorporating weather conditions into call volume predictions and tracking staff experience to analyze variation in average handling time between new and experienced call takers.

The following table presents the occupancy of call takers from 2023 to Q12025 and their targets.

	2023	2024	Q12025	Target
911	45%	35%	30%	55%
Police ER ECLMD	62%	58%	52%	65%
Police NER ECLMD	88%	73%	62%	75%
Fire ER	65%	64%	64%	65%
Fire NER	65%	64%	64%	75%
PCT ECVI	54%	52%	48%	65%

**Table 33: Occupancy rate in 2023, 2024 and 1Q2025**

## Appendix O: Prioritization of recommendations and rationale

Ref.	Recommendation	Impact	Complexity	Rationale
<b>Governance</b>				
1-1	Optimize the Board size to 8-12 independent members with an appropriate mix of skills to enhance governance effectiveness, accountability, and decision-making.	Very High	High	<p>Will enable greater effectiveness with governance, decision making, and implementing the remaining recommendations. This recommendation is considered foundational.</p> <p>Implementation requires amending the Members’ Agreement and Company Articles, securing ministerial approval, and managing potential resistance from current members, but does not depend on broader legislative reform.</p>
1-2	Update the Terms of Reference for the Board of Directors to include a structured Board tenure policy and cycle recruiting for positions to ensure staggered term-end across the positions.	Medium	Medium	<p>Implementation requires amending the Company Articles, which mandates all Directors retire at the AGM, and adjusting recruitment cycles so term expirations are distributed. This can be achieved in the short term without broader governance reform, with its primary effect being improved Director transition timing and continuity rather than structural change.</p>
2-1	Clearly define the Province’s role within emergency communications and align legislative mechanisms to support clarity in roles and responsibilities, effective governance, performance management, and the ability to influence impacts to public safety.	Very High	High	<p>Several current state challenges stem from lack of clarity on the provincial role as a root cause.</p> <p>Implementing this recommendation will require updates to legislation and coordination among public safety agencies, local governments, and service PSAP service providers. This may be a staged, long-term initiative but is considered foundational.</p>

Ref.	Recommendation	Impact	Complexity	Rationale
3-1	Define a comprehensive stakeholder framework that is both complementary and aligned to the new governance model. The framework should clearly outline roles and responsibilities (both on behalf of the client and shareholder organizations, as well as E-Comm), and should reflect both governance-level relationships and operational relationships.	Very High	Medium	Establishing this framework would significantly improve collaboration, transparency, and clarity between governance and operational partners with direct impact on operational efficiencies and support for more effective governance structures. Implementation requires consultation with multiple stakeholders and alignment with governance model reforms. It should occur before, or in parallel, with Board structure changes to maintain consistent communication and understanding.
4-1	Shift strategic planning to a three-year plan to enable greater responsiveness to key issues as they arise, and higher impact strategic decision making.	High	Low	Moving to a three-year plan can strengthen the E-Comm’s ability to respond to emerging priorities while maintaining a focus on transformational initiatives. This change is achievable quickly since it builds on existing planning processes, but its full value is realized when coupled with governance and performance frameworks (5-1) to track results and avoid overextension.
4-2	Refocus the ELT on strategic priorities and critical challenges requiring executive direction to enable clearer prioritization, more effective governance and accelerated transformation progress.	High	Low	This will free leadership capacity for long-term priorities and higher-impact decisions, contributing to more effective governance. As an internally controlled change, it is low in complexity and can be implemented quickly. While not a prerequisite for other reforms, it can help ensure their execution stays on track.
5-1	Develop a structured Corporate Performance Measurement Framework aligned to strategic planning objectives to support regular and timely updates against plan as well as ongoing organizational reporting.	High	Medium	Impact is high as it contributes to enhanced accountability across the organization. Complexity is affected by defining metrics, governance approvals, and embedding reporting systems as well as the close correlation required with the strategic planning process.
<b>Finance</b>				
6-1	Revisit the strategic planning process and financial governance practices to	High	Medium	This reform links budgeting directly to strategy, addressing transparency and accountability concerns, especially when implemented with strategic planning recommendations.

Ref.	Recommendation	Impact	Complexity	Rationale
	incorporate and align strategic priorities within budget setting.			Complexity arises from redesigning budget governance, aligning timelines with strategic planning, and gaining stakeholder approval. It is closely tied to strategic direction and policies (4-1), and budgeting process adjustment (6-4).
6-2	Annually present a full organizational budget to the Finance Committee for analysis and Board for approval, inclusive of key trade-off decisions that are required to manage costs.	High	Low	Providing the full budget for committee review would strengthen oversight and transparency. It builds on existing processes and requires minimal changes in budget presentation which are actionable in the near-term. Efforts on aligning budgeting with strategic priorities (6-1) will need to be implemented to enable identification of trade-off and key decisions the Board could make in line with strategic goals.
6-3	Include levy communications formally in the stakeholder management framework to support funding agencies in understanding how costs and approved budget are translated into levies.	Medium	Low	It will improve trust and cost understanding among members. It is straightforward to implement by enhancing current communication materials. Dependent on completion of stakeholder framework (3-1) so that levy communication is integrated consistently with other governance and engagement processes.
6-4	Adjust the budgeting process to focus on services or service-based budgeting.	Medium	Medium	Service-based budgeting increases transparency by linking spending to service delivery. It depends on accurate cost allocations (11-1), pricing strategies (12-1), and a service catalogue (16-1), making sequencing important. Moderate complexity due to the need for process redesign, the dependencies on other recommendations, and reporting changes.
6-5	Align financial forecasting processes with local government budgeting timelines.	Medium	Low	Synchronizing forecasts with municipal cycles should improve coordination and reduce planning conflicts while improving stakeholder relationships. Requires process and calendar adjustments but no structural overhaul, making it achievable in the short-term.
7-1	Continue to move toward accurate five-year forecasts for the Board and funding agencies to provide greater financial predictability for E-Comm and clients.	High	Medium	Longer-term forecasts improve planning certainty and capital investment readiness as well as stakeholder trust and accountability.

Ref.	Recommendation	Impact	Complexity	Rationale
				Implementation requires strong forecasting models and integration with strategic and capital planning processes. E-Comm has already started transitioning towards integrated budgets and five-year forecasts.
8-1	Establish a contingency or stabilization reserve with appropriate controls to smooth unexpected expenses and impacts on levies during significant, unanticipated events.	Low	Low	A stabilization or contingency reserve would support more effective budgeting processes and lower the impact of unanticipated significant events on levies. Impacts will not be realized in the short term. E-Comm is developing policies for the creation of a reserve fund to be presented at the September 2025 Board meeting.
9-1	Enhance expense management practices and reporting to include ongoing expense tracking, budget variances and forecasting that track progress and variances against strategic priorities.	High	Medium	Strengthening expense tracking and reporting aligns spending with strategy and improves cost control. This may require system or reporting upgrades and is reliant on identification of and reporting against strategic priorities as highlighted in recommendations 6-1 and 6-2.
11-1	Align corporate costs directly to service delivery and the respective Business Lines to enhance financial accountability and transparency.	Medium	Medium	Linking overhead to services clarifies spending impacts and supports accountability. It is closely related to budgeting process adjustment (6-4) and service catalogue (16-1), requiring coordinated updates to accounting systems and processes, extensive stakeholder engagement, and Board approval.
11-2	Enhance transparency in stakeholder reporting by including costs associated with the direct consumption of services.	Medium	Medium	Adding direct consumption cost data to reports increases financial clarity and stakeholder trust. Recommendation can be more easily implemented by expanding current reporting but depends on validated cost allocation and usage data and direct assignment of costs from 10-1.
12-1	E-Comm should consider implementing pricing strategies to support alignment between services provided and cost to deliver.	High	High	A standardized pricing model would overhaul cost recovery and service structures. It depends on accurate cost allocations (11-1), alignment of corporate costs (12-1), and a service catalogue (18-1), and requires sector-wide agreement and possible contract amendments.
13-1	Create a capital reserve fund specifically for Operations to support adequate funding	Low	Medium	A capital reserve stabilizes funding for infrastructure needs, but impacts will not be realized in the short term.

Ref.	Recommendation	Impact	Complexity	Rationale
	for capital projects and enhance financial planning and sustainability.			Implementation requires policy design and integration into budget cycles. Complexity is increased by the stakeholder engagement and buy-in required to proceed.
13-2	Consider including funding for the capital reserve (more than amortization expenses) in annual levies to support financial sustainability and to smooth the impact of capital expenditure over time.	Low	Medium	A capital reserve stabilizes funding for infrastructure needs, but impacts will not be realized in the short term. Implementation requires policy design and integration into budget cycles (contingent on 12-1). Complexity is increased by the stakeholder engagement and buy-in required to proceed.
<b>Operations</b>				
14-1	Develop a benchmarking framework that incorporates industry standards, leading practices from other jurisdictions and client expectations for key metrics, while implementing a process for regular review of metrics and benchmarks. Service quality metrics should be incorporated as key metrics.	Low	Medium	Could improve ability to evaluate and communicate performance impacting client trust, and operational effectiveness. Implementation requires stakeholder consultation, development of new quality audit processes, and data collection, making it more complex and requiring a longer implementation horizon.
14-2	Service quality metrics should be used for continuous improvement in call-taking and dispatch services, including non-emergency calls.	Medium	Low	This recommendation involves applying the quality standards established in 14-1 to embed service quality metrics into ongoing performance management for call-taking and dispatch services. Some measures can be implemented sooner in areas where baseline data exists. Early adoption will allow E-Comm to identify trends and address service issues proactively, driving targeted improvements and greater consistency.
15-1	Reassess current service level targets to determine if they appropriately balance client needs, cost-effectiveness and alignment with industry standards. Document the approved targets and establish a cadence for regular reassessment.	Medium	Medium	Reassessing service level targets for appropriateness requires gathering benchmark data from recognized sources such as NENA and other jurisdictions, identifying gaps through client feedback, and assessing the financial implications of any changes. Coordination with the Province to formalize requirements, link funding, and secure consensus across local governments adds inter-jurisdictional complexity.

Ref.	Recommendation	Impact	Complexity	Rationale
16-1	Create a standardized service catalogue with definitions of services offered by E-Comm. This should include detailed descriptions each service and the associated pricing structures by service and be completed in conjunction with improvements to the new financial model.	High	High	<p>A service catalogue clarifies service scope and pricing, supporting transparency and informed decision-making.</p> <p>This recommendation is a critical prerequisite for budgeting process adjustment (6-4), alignment of corporate costs (11-1), and pricing strategy implementation (12-1). It is also a prerequisite for implementing standardized agreements (16-2), ensuring contracts reflect consistent service definitions and pricing structures.</p> <p>Development will require consultation with operational clients to define offerings, establish a transparent, formula-based pricing model, and set an organization-wide schedule for adjustments.</p>
16-2	Develop and implement formal standardized agreements with all operational clients to clearly outline the scope of services provided.	Medium	High	<p>Standardized agreements will streamline negotiations, clarify service scope and costs, and address pricing uncertainty that limits long-term agreements.</p> <p>Implementation requires legal drafting, negotiation, and coordination with municipalities, with potential Provincial support for adoption. This recommendation is enabled by completion of the service catalogue (16-1) and related financial reforms.</p>
17-1	Further build E-Comm’s resilience capability by addressing key gaps identified in the detailed resilience assessment.	Medium	Medium	<p>Implementation requires internal coordination across multiple functions as well as consideration to E-Comm’s role in the broader emergency communications ecosystem to build on overall system resilience.</p> <p>There are several activities outlined within this one recommendation increasing the planning and coordination efforts required for implementation. However, this can begin by using existing protocols and progress, making it possible to implement in the short term.</p>

**Table 34: Prioritization of recommendations**

## EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data, AI and advanced technology, EY teams help clients shape the future with confidence and develop answers for the most pressing issues of today and tomorrow.

EY teams work across a full spectrum of services in assurance, consulting, tax, strategy and transactions. Fueled by sector insights, a globally connected, multi-disciplinary network and diverse ecosystem partners, EY teams can provide services in more than 150 countries and territories.

All in to shape the future with confidence.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via [ey.com/privacy](https://ey.com/privacy). EY member firms do not practice law where prohibited by local laws. For more information about our organization, please visit [ey.com](https://ey.com).

© 2025 Ernst & Young LLP.  
All Rights Reserved.

This publication contains information in summary form, current as of the date of publication, and is intended for general guidance only. It should not be regarded as comprehensive or a substitute for professional advice. Before taking any particular course of action, contact Ernst & Young or another professional advisor to discuss these matters in the context of your particular circumstances. We accept no responsibility for any loss or damage occasioned by your reliance on information contained in this publication.

[ey.com/ca](https://ey.com/ca)