



Telecom Decision CRTC 2005-72

Ottawa, 20 December 2005

Implementation of wireless number portability

Reference: 8620-C12-200510934

In this Decision, the Commission requires wireless carriers to port in and port out telephone numbers, and grants them direct access to existing Canadian number portability systems, without having to meet the competitive local exchange carrier obligations at this time.

The Commission determines that the porting scenarios outlined in Implementation of wireless number portability, Telecom Public Notice CRTC 2005-14, 16 September 2005, are appropriate for wireless porting activities between Canadian carriers.

The Commission determines that the appropriate service interval for simple intermodal (wireless-to-wireline and wireline-to-wireless) porting, including simple ports involving wireless resellers or mobile virtual network operators, is to be the same as the local exchange carrier-to-local exchange carrier (LEC-to-LEC) service interval for stand-alone porting, which is currently two business days. The Commission also determines that the appropriate service interval for wireless-to-wireless simple porting is 2.5 business hours.

The Commission directs:

- (i) Bell Mobility, Rogers Wireless Inc. and the mobility division of TELUS Communications Inc. to implement wireless number portability (WNP) in British Columbia, Alberta, Ontario and Quebec, where LEC-to-LEC local number portability (LNP) is currently in place, by 14 March 2007. Where LEC-to-LEC LNP is currently in place elsewhere, as well as Regina and Saskatoon, these wireless carriers operating in these areas must also implement porting-out by 14 March 2007, may implement porting-in on or after 14 March 2007, and must implement porting-in by 12 September 2007;*
- (ii) all other wireless carriers to implement, at a minimum, the porting-out of customers, where LEC-to-LEC LNP is currently in place, as well as Regina and Saskatoon, by 14 March 2007. In these areas, they may implement porting-in any time on or after 14 March 2007, and must implement porting-in by 12 September 2007;*
- (iii) for all other locations where LNP does not exist, WNP would be introduced within Commission-approved time periods upon wireless carrier notification to an incumbent local exchange carrier;*
- (iv) that both simple and complex porting be supported when either wireless number porting-in or porting-out commences; and*
- (v) all LECs to support the porting-in and out of telephone numbers with wireless carriers within the time frames set out above.*

Background

1. Number portability enables customers to keep the same telephone number when changing service providers. The Commission has required wireline carriers to implement local number portability (LNP) since it issued *Local Competition*, Telecom Decision CRTC 97-8, 1 May 1997 (Decision 97-8). In Telecom Order CRTC 99-5, 8 January 1999 (Order 99-5), the Commission, based on the record of a proceeding initiated in a letter to the industry of 17 July 1997, concluded that access to LNP systems to port numbers should be restricted to local exchange carriers (LECs).
2. In its three-year work plans issued in 2004 and 2005, the Commission indicated that the issue of wireless number portability (WNP) would be considered during the 2005-2006 fiscal year. In a letter dated 18 March 2005, the Minister of Industry informed the Commission that the Budget Plan tabled in Parliament on 23 February 2005 made reference, among other things, to the Government of Canada's intention to request the Commission to move expeditiously to implement WNP. The Minister noted that consideration of WNP was included in the Commission's three-year work plan, and was therefore confident that the Commission would deal with this matter in an expeditious manner. The Minister indicated that the Government of Canada understood that WNP included wireless-to-wireless, wireline-to-wireless and wireless-to-wireline number portability.
3. On 21 April 2005, the Canadian Wireless Telecommunications Association (CWTA) announced that Canada's wireless carriers had agreed to implement WNP. To that end, the CWTA engaged PricewaterhouseCoopers LLP (PwC) to conduct an independent review and provide an implementation plan to be used by the wireless industry to implement WNP. The implementation report, entitled *Implementation of Wireless Number Portability: Setting a New World-Class Standard* (the PwC Report), was presented by the CWTA to the Commission for information on 12 September 2005. The CWTA advised the Commission in its covering letter that it supported the conclusions of the PwC Report.
4. On 16 September 2005, the Commission issued *Implementation of wireless number portability*, Telecom Public Notice CRTC 2005-14 (Public Notice 2005-14),¹ in which it invited comments on modifying the current regulatory regime so that wireless carriers could port telephone numbers. The Commission noted that this ability may require the telecommunications industry to modify, *inter alia*, its number porting and customer transfer processes. The Commission set out four issues related to WNP between wireless carriers and between those carriers and wireline LECs.²
5. The Commission considered that dealing expeditiously with the issues set out in Public Notice 2005-14 would permit WNP to be implemented at the earliest possible date. The Commission noted that a number of other issues related to WNP will be considered in a future proceeding.

¹ As amended by *Implementation of wireless number portability*, Telecom Public Notice CRTC 2005-14-1, 6 October 2005, in which the Commission updated the list of companies made parties to the proceeding established in Public Notice 2005-14.

² Porting between wireless carriers and wireline local exchange carriers is referred to as intermodal porting.

Process

6. On 6 October 2005, the Commission received comments from Aliant Telecom Inc. on behalf of itself and Aliant Mobility (collectively, Aliant Telecom); Bell Canada on behalf of itself, Aliant Telecom Inc., Aliant Mobility, Bell Mobility, Société en commandite Télébec and Télébec Mobilité (collectively, the Companies); the CWTA, which included a copy of the PwC Report with its comments; MTS Allstream Inc. (MTS Allstream); PricewaterhouseCoopers LLP (PwC); Primus Telecommunications Canada Inc. (Primus); the Public Interest Advocacy Centre (PIAC) on behalf of itself, the Consumers' Association of Canada, the National Anti-Poverty Organization, and l'Union des consommateurs (collectively, PIAC et al.); Rogers Cable Communications Inc. (Rogers Cable); Rogers Wireless Inc. (Rogers Wireless); Saskatchewan Telecommunications (SaskTel); TELUS Communications Inc. and TELE-MOBILE Company carrying on business as TELUS Mobility³ (collectively, TELUS); and Virgin Mobile Canada (Virgin Mobile).
7. The Commission also received interventions from 46 individuals during the course of the proceeding.
8. On 17 October 2005, the Commission received reply comments from the Companies, the CWTA, MTS Allstream, PIAC et al., Rogers Wireless, SaskTel and TELUS. The Commission also received interrogatory responses from Bell Mobility, the CWTA and Rogers Wireless, and on 18 October 2005, from SaskTel. The responses were filed in confidence.
9. On 21 and 24 October 2005, the CWTA and TELUS, respectively, provided further reply comments.
10. The issues considered in this proceeding are discussed below in the following sections:

Section A - Access to number portability systems

Section B - Scenarios to port a telephone number to and/or from a wireless carrier

Section C - Service intervals to port a telephone number to and/or from a wireless carrier

Section D - WNP implementation time frames

A - Access to number portability systems
11. In Public Notice 2005-14, the Commission invited comment on whether to permit wireless carriers to access LNP systems directly, and under what terms and conditions.

³ On 24 November 2005, TELUS Corp. announced that it was merging its wireless and wireline divisions. TELUS Mobility and TELUS Communications Inc. would be consolidated into one operation.

Positions of parties

Comments

12. All parties agreed that wireless service providers (WSPs) that are also wireless carriers should be granted direct access to the existing LNP systems. All parties except MTS Allstream agreed that this should be done without requiring wireless carriers to meet the obligations established by the Commission for competitive local exchange carriers (CLECs) in Decision 97-8. MTS Allstream was of the view that wireless carriers should have access to LNP systems, but on the same terms and conditions as CLECs.
13. TELUS argued that much had changed since Decision 97-8 was issued and that extending the privilege of access to the Number Portability Administration Centre Service Management System (NPAC/SMS) to wireless carriers to provide number portability would have relatively little impact in today's competitive environment. In TELUS' view, many of the regulatory obligations established for CLECs had been based on legacy wireline telephone obligations. The CWTA, SaskTel and Rogers Wireless submitted that the Commission should promptly issue a determination that removed the current prohibition on wireless carrier access to LNP systems.
14. Rogers Wireless contended that requiring wireless carriers to become CLECs in order to access LNP systems would be counter-productive to implementing WNP in a timely manner, since becoming a CLEC was a very time-consuming process. Among other things, CLECs are required to have a specific set of interconnection trunks and a central office (CO) code for every incumbent local exchange carrier (ILEC) exchange in which they operate. In this regard, TELUS submitted that support from wireless carriers for the Government's WNP initiatives was made on the basis that the WSP regulatory regime would remain unchanged.
15. In regard to wireless resellers, SaskTel submitted that it was neither necessary, nor desirable, for wireless resellers to access LNP systems, just as wireline resellers cannot access these systems. In its view, since the underlying carrier would be capable of porting numbers to or from its own facilities on behalf of a wireless reseller, and of delivering calls to a wireless reseller's ported-in numbers, the wireless reseller would receive the benefits of operating in a number portability environment through the capabilities of its underlying carrier.
16. Virgin Mobile indicated that it would prefer to process porting requests through its carrier, Bell Mobility. Virgin Mobile submitted that porting from another carrier to a mobile virtual network operator (MVNO), such as itself, was no more challenging than porting from one facilities-based carrier to another.
17. The Companies, the CWTA, Rogers Wireless, SaskTel, TELUS and Virgin Mobile agreed with the recommendation made in the PwC Report that, with a few changes, the existing infrastructure, i.e. NPAC/SMS, could be utilized to support WNP. The CWTA expressed the view that access to the LNP systems already in place was the most efficient, cost-effective and fastest way to implement WNP. The CWTA, Rogers Wireless and Virgin Mobile submitted that direct access to NPAC/SMS and use of existing Canadian Local Number Portability Consortium (CLNPC) arrangements would save time, and avoid duplication of effort or infrastructure.

18. Virgin Mobile submitted that many process definitions such as the Wireless Intercarrier Communications Interface Specification (WICIS) created in the United States (U.S.) could be used and modified for purposes of Canadian specifications. The Companies agreed and suggested that NPAC/SMS system changes required to accommodate the adoption of WICIS standards were well understood by the current NPAC/SMS provider.
19. The Companies, SaskTel and TELUS were of the view that wireless carriers should bear the costs associated with changes required to NPAC/SMS to accommodate the wireless industry. SaskTel proposed that the CLNPC be given the task of recommending an equitable method of recovering the costs of such changes. The Companies, the CWTA, Rogers Wireless, SaskTel and TELUS submitted that wireless carriers should be allowed access to NPAC/SMS provided they became shareholders of the CLNPC. TELUS added that wireless carriers should have the same voting rights and obligations as the existing members of CLNPC, such as contributing to the recovery of the routine operational NPAC/SMS costs and the provision of reciprocal porting, and should pay any incremental one-time costs associated with their access to NPAC/SMS.
20. The Companies submitted that the allocation of costs associated with the administration and operation of the CLNPC should follow a transaction-based or usage-based model, as opposed to the current allocation model adopted in Telecom Order CRTC 97-1243, 5 September 1997. The Companies indicated that a usage-based model was accepted by CLNPC shareholders in 2001. The Companies considered that a usage-based model was appropriate now that a substantial change to the membership of the CLNPC was being contemplated that would increase demand for NPAC/SMS resources.

Reply comments

21. PIAC et al. expressed concern that giving the CLNPC the task of recommending an equitable method of allocating ongoing NPAC/SMS operating costs to reflect the addition of wireless carriers to the consortium would open the door to lengthy disputes over costs within the CLNPC. PIAC et al. submitted that the CLNPC would resolve these disputes by making the decision to pass costs on to the consumer. PIAC et al. stated that consumers should not have to pay for WNP to make the market more competitive. In this respect, PIAC et al. noted that most carriers suggested that they would absorb WNP-related costs and there would be no charge to customers for WNP.
22. Rogers Wireless submitted that any discussions concerning the issue of NPAC/SMS costs should take place after wireless carriers become shareholders of the CLNPC, with full voting rights.
23. TELUS agreed with the Companies' position that allocation of costs should follow usage of system resources. TELUS, the Companies, MTS Allstream and SaskTel agreed that the current cost sharing arrangements used to allocate costs of the national number portability systems should be revised and adjusted to reflect the addition of wireless carriers.

24. While the Companies, SaskTel and TELUS agreed that wireless carriers should pay for the changes required to the LNP systems since the wireless carriers and their customers would be the primary beneficiaries of WNP, Rogers Wireless believed that those costs should be defrayed across the base of all carriers that directly connect to the LNP systems, since wireline and wireless customers would both benefit from WNP.
25. MTS Allstream submitted that the record of this proceeding was not sufficient to determine whether the current model of allocating costs associated with the CLNPC should be replaced with a transaction-based model.
26. In a further reply to comments, the CWTA submitted that PIAC et al. had taken the discussion of CLNPC costs out of context. In its view, the conclusion drawn by PIAC et al. that there would be no charge to customers for WNP might not be an accurate interpretation of carriers' future intentions in this regard. The CWTA suggested that wireless carriers would individually make decisions regarding if, and how, they would recover the costs of implementing WNP.

Commission's analysis and determinations

Access to Canadian number portability systems

27. As noted above, the Commission concluded in Order 99-5 that access to LNP systems should be restricted to LECs. The Commission considered that extending access to LNP systems to non-LECs to provide, among other things, portability between LECs and non-LECs, would alter the terms of the framework established for local competition in a manner contrary to the public interest.
28. Since that time, however, facilities-based competitors, including out-of-territory ILECs, are increasingly providing wireless services and other services utilizing wireless and Internet protocol technologies as part of their overall service packages. Further, these alternative technologies are increasingly being used by the ILECs for their in-territory service offerings.
29. In these circumstances, while the Commission recognizes that extending number portability system access to wireless carriers would alter the regulatory framework for local competition established in Decision 97-8, it considers that the overall objective of that Decision can be better achieved by permitting wireless carrier access to number portability systems. The Commission considers that such access would be in accordance with its principle of technological neutrality as expressed in that Decision and result in an increased level of competition in both the local exchange service and wireless markets.
30. The Commission considers that permitting wireless carriers to access LNP systems would expand the benefits of number portability to wireless customers and to those wishing to switch from wireline to wireless and vice versa. The Commission considers that allowing subscribers to retain their current telephone numbers when they switch service providers is a key element in minimizing the inconvenience and, in the case of businesses, avoiding potential loss of business and unnecessary costs of having to change stationery, letterhead and advertising materials. In the Commission's view, customers should be given the widest possible choice of service providers to meet their needs, and there should be minimal inconvenience, risk and related costs when changing service providers.

31. The Commission notes that the results of a consumer survey conducted by Decima Research Inc. for the Commission⁴ in 2005 found that 70 percent of households with at least one wireless subscription felt that being able to keep their wireless telephone number when changing service providers was important. The Commission is of the view that WNP will further competition and growth of wireless telephony in Canada, where penetration is less than in many OECD countries.⁵
32. The Commission notes that one of the fundamental pillars of the PwC Report is its recommendation to use the existing LNP infrastructure for WNP implementation. The Commission agrees that doing so would permit the pooling of resources, avoid duplicating effort and cost, and aid in the timely implementation of WNP.
33. In light of the above, the Commission concludes that WNP would be in the public interest. The Commission therefore **directs** that wireless carriers be granted direct access to the existing Canadian number portability systems (i.e. NPAC/SMS).

Wireless carriers and CLEC obligations

34. The Commission notes that all parties, except MTS Allstream, stated that it was not necessary for wireless carriers to become CLECs in order to access LNP systems. The Commission notes that Rogers Wireless submitted that it would take a great deal of work, time and investment for wireless carriers to convert their networks to meet the CLEC conditions. Such conditions include interconnection trunk reconfiguration and acquiring additional CO/NXX codes. In the Commission's view, imposing CLEC obligations on WSPs in order to have access to LNP systems could delay the start date for WNP, which would not be in the public interest.
35. In light of the above, the Commission **directs** that wireless carriers access LNP systems without having to meet the CLEC obligations at this time.

Wireless reseller access to number portability systems

36. On the question of whether wireless resellers should have direct access to LNP systems, the Commission notes that wireline resellers do not have such access. The Commission considers that, unlike their underlying carriers, wireless resellers and MVNOs may not have all the necessary network information or network access to properly complete number porting. The Commission therefore considers that they should gain access to number portability systems via their underlying carriers.
37. Nonetheless, the Commission is of the view that wireless resellers and MVNOs should be required to support the porting-in and out of their customers and that all Canadian wireless carriers should include this condition in all contracts and other arrangements with wireless resellers and MVNOs.

⁴ These results were summarized in the *Report to the Governor in Council - Status of Competition in Canadian Telecommunications Markets - Deployment/Accessibility of Advanced Telecommunications Infrastructure and Services*, October 2005.

⁵ Organisation for Economic Co-operation and Development, *OECD Communications Outlook 2005*.

38. In light of the above, the Commission determines that wireless resellers and MVNOs are not to have direct access to number portability systems. The Commission **directs** all Canadian wireless carriers, as a condition of providing telecommunications services to wireless resellers and MVNOs, to incorporate in all existing and future contracts and other arrangements with wireless resellers and MVNOs, the requirement that wireless resellers and MVNOs support the porting-in and out of telephone numbers.

Shareholding in the CLNPC and cost recovery

39. As regards shareholding in the CLNPC, the Commission agrees that as wireless carriers are to access LNP systems, they should become voting shareholders of the CLNPC in order to permit them to participate in all operational aspects of LNP systems.
40. The Commission notes that parties had varying views on who should pay for the one-time system modification costs and on-going costs. The Commission considers that the one-time costs for the NPAC/SMS modifications and the on-going costs are unknown at this time and that the record of this proceeding is not sufficient to make a determination on this issue. The Commission notes that many of the relevant matters are confidential in nature to the members of the CLNPC and its primary NPAC/SMS vendor. In the Commission's view, these matters would be best discussed and resolved within the CLNPC.
41. Accordingly, the Commission **directs** wireless carriers to become voting shareholders of the CLNPC. The Commission refers to the CLNPC the matter of cost recovery for both one-time and ongoing costs associated with wireless carriers' access to the Canadian number portability systems. In view of the revisions required to incorporate wireless carriers into the consortium, the CLNPC is **directed** to file its revised Unanimous Shareholders' Agreement for Commission approval, together with any changes to the cost recovery methodology, within four months of the date of this Decision.

B - Scenarios to port a telephone number to and/or from a wireless carrier

Background

42. In Public Notice 2005-14, the Commission noted that due to the nature of wireless networks, service coverage areas are unlikely to be coterminous with telephone exchange boundaries. Further, wireless customers do not receive service at a single geographic point, in that they can make and receive calls at any location where they can receive a network signal.
43. The Commission further noted that wireless carriers use North American Numbering Plan (NANP) geographic-based numbers that are associated with a specific rate centre that uniquely locates a telephone exchange. With NANP numbers, all calls to a number associated with an exchange are deemed to have terminated at the rate centre of the exchange. This rating principle also applies to all calls to wireless numbers.⁶

⁶ Calls originating from wireless telephones are deemed to have originated from the physical location of the wireless handset at the time that a call is made.

44. The Commission noted in Public Notice 2005-14 that call routing between carriers is not subject to this same principle, in that it is not necessary for the interchange of traffic between carriers to occur within the telephone exchange associated with the rate centre for the terminating telephone number. For example, the interchange of traffic can occur at points of interconnection that aggregate traffic for multiple exchanges.⁷
45. Because of the fundamental difference between wireline-based networks and wireless networks, the Commission was of the view that it was necessary to determine the circumstances in which a number could be ported in each type of porting identified in Public Notice 2005-14: wireless-to-wireless, wireline-to-wireless, and wireless-to-wireline. The Commission accordingly invited comment on the following porting scenarios:

Wireless-to-wireless porting: the porting of telephone numbers between wireless carriers is permitted regardless of a subscriber's physical location or billing address, as long as the ported telephone number maintains its original telephone exchange designation for rating purposes.

Wireline-to-wireless porting: the porting of telephone numbers between wireline-based carriers⁸ and wireless carriers is permitted as long as the telephone number maintains its original telephone exchange/rate centre designation for rating purposes.

Wireless-to-wireline porting: the porting of telephone numbers between wireless carriers and wireline-based carriers may be limited by the ability of a wireline-based network to provide service to a former wireless service customer when that customer's physical service location is located outside the telephone exchange area associated with the telephone number to be ported. Therefore, it will be at the option of the wireline-based carrier to accept or deny porting of telephone numbers from wireless carriers when a customer's location is outside the telephone exchange area associated with a telephone number.

Positions of parties

Comments

46. Most parties indicated that they supported the porting scenarios presented by the Commission in Public Notice 2005-14.
47. The CWTA noted that the Commission's wireline number portability rules allow LEC subscribers to retain their telephone number if they change service providers, when the telephone number remains within the ILEC exchange where the number was originally assigned. The CWTA indicated that in discussions it convened with its members regarding porting telephone numbers across exchange boundaries (interexchange porting), consensus was not reached.

⁷ See *Trunking arrangements for the interchange of traffic and the point of interconnection between local exchange carriers*, Telecom Decision CRTC 2004-46, 14 July 2004.

⁸ Wireline-based carriers includes both incumbent LECs and wireline and wireless CLECs.

48. The CWTA indicated that WSPs frequently requested CO codes in ILEC exchanges that had large local calling areas (LCAs) or Extended Area Service. WSPs served their customers throughout, and quite often, beyond the ILEC LCAs. The CWTA and the Companies submitted that this practice happened throughout Canada and complicated the implementation of WNP. In their view, if the current rules for LNP were retained, WSPs would be required to request additional CO codes in additional exchanges to facilitate porting wireline telephone numbers to those WSPs and, in some cases, wireless telephone numbers. The CWTA and the Companies added that in some cases, porting telephone numbers from wireless-to-wireline service providers might not be possible (e.g. if the customer's telephone number did not correspond to the exchange that included the customer's service address).
49. SaskTel indicated that the volume of wireless-to-wireline porting was expected to be insignificant, with the percentage of interexchange porting even less significant.
50. PIAC et al. was also of the view that wireless-to-wireline porting would be the least utilized by consumers. It submitted, however, that porting should not be optional for the service provider to whom the customer transfer is to be made. In its view, in order to maintain competitive-neutrality, ILEC-owned WSPs should not be able to guarantee porting to their related wireline businesses while competitors could not.
51. The CWTA and the Companies submitted that a number of changes, some straightforward, some more complicated and costly, would be triggered by any change to the current LNP rules. They indicated that when a telephone number was ported from one service provider to another, it affected all other service providers because it required all of them to process and route calls based on the dialled digits and the Location Routing Number (LRN) associated with the ported telephone number.
52. MTS Allstream submitted that the introduction of intermodal porting would likely give rise to technical issues that had not been encountered to date. It felt that there was sufficient time for the industry to resolve any issues and to develop detailed porting processes.
53. Rogers Wireless and Virgin Mobile supported the porting scenarios in Public Notice 2005-14 and the inclusion of intermodal porting in the initial implementation of WNP.
54. In regard to interexchange porting, Rogers Wireless argued that only modest changes would be required to accommodate this type of porting. It indicated that the U.S. approach to interexchange porting is identical to the approach set out in Public Notice 2005-14. It submitted that interexchange porting would maximize the extent to which customers could port their numbers to other carriers, and would also avoid the modifications that may be necessary if the rating treatment of these numbers was modified. In Rogers Wireless' view, interexchange porting could be limited to exchanges within the same LCA or local interconnection region (LIR), which would eliminate or minimize any long distance charges for calls made to ported numbers.

55. The CWTA submitted that the CRTC Interconnection Steering Committee (CISC) was the appropriate forum to consider intermodal porting scenarios. It indicated that some of its members submitted that interexchange porting should be considered by CISC, while others believed that this proceeding was the appropriate place to deal with this issue, with residual issues being considered by CISC.

Reply comments

56. TELUS and Virgin Mobile indicated that the intermodal porting scenarios should be referred to CISC for further consideration.
57. PIAC et al. suggested that the technical issues surrounding interexchange porting could be referred to CISC, but should not delay wireless-to-wireless porting.
58. Rogers Wireless submitted that the suggestion to refer the interexchange porting scenarios to CISC was an attempt to delay or entirely avoid the proposed requirements for porting. Rogers Wireless further submitted that wireless carriers in the U.S. have been porting telephone numbers from wireline carriers across rate centre boundaries since the time that WNP was implemented. In its view, the porting scenarios in Public Notice 2005-14 were practical and could be accommodated by the legacy wireline networks with only modest changes.
59. The Companies submitted that they supported the Commission's porting scenarios, provided the following conditions were met in each case:
- (a) the telephone number remains associated with the ILEC exchange area in which the telephone number and its CO code was originally assigned;
 - (b) local versus long distance call determination for LECs be based on the originating telephone number and the dialled telephone number;
 - (c) long distance call rating and billing be based on the originating telephone number and the dialled telephone number; and
 - (d) routing of calls to ported telephone numbers be based on the LRNs assigned to ported telephone numbers in accordance with the current Commission-approved LRN Selection Criteria contained in the Canadian CO Code (NXX) Assignment Guidelines.

Commission's analysis and determinations

60. The Commission notes that the wireless carriers have been using NANP geographic-based numbers in their networks for over 20 years. Their telephone numbers have often been within the same CO/NXX code provisioned in an ILEC's switch. The Commission notes that wireless subscribers are free to roam with their handsets and seamlessly make and receive calls anywhere they receive a network signal. Since telephone numbers remain associated with a single rate centre, call rating has not been an issue.

61. The Commission notes that number portability changes the call routing paradigm:
- (i) calls are no longer routed based solely on the dialled number;
 - (ii) calls are routed to the appropriate terminating point of interconnection or switch based on an LRN;
 - (iii) an LRN for a CO code could be located outside of the exchange area boundaries.⁹
62. The porting scenarios outlined in Public Notice 2005-14 take into account the manner in which wireless carriers have successfully used geographic-based telephone numbers and the routing paradigm under LNP. The Commission notes that while the Companies placed four conditions on their support of the porting scenarios presented in the Public Notice 2005-14, the majority of the parties agreed, in principle, with the scenarios.
63. The Commission considers that WNP should function as seamlessly as possible and to the greatest extent possible. In the Commission's view, the porting scenarios in Public Notice 2005-14 fulfill these objectives, as well as the Companies' four proposed conditions. The first three conditions would be met because the ported telephone number would remain associated with its original rate centre designation. The fourth condition would also be met because Decision 2004-46 created the condition for traffic associated with a grouping of exchanges to be routed to a single point of interconnection, with that point identified by an LRN. The single point of interconnection is outside of the exchange boundary for many of the exchanges in a grouping of exchanges.¹⁰
64. In regard to the proposal to refer the porting scenarios for intermodal and interexchange porting to CISC for further consideration, the Commission notes that wireless and intermodal porting has been in place in the U.S. since November 2003. Under *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, FCC 03-284, 10 November 2003*, the Federal Communications Commission ordered similar porting scenarios to those presented in Public Notice 2005-14. In the Commission's view, since call rating principles are maintained and the call routing uses current LNP routing practices, it is not necessary to refer this matter to CISC.
65. The Commission notes that the issue of the interchange of traffic between wireless carriers and LECs in a WNP environment was identified in Public Notice 2005-14 as an issue for consideration in a future proceeding. The Commission considers that the issue of traffic routing based on LRNs and the need for wireless carriers to obtain CO codes should be dealt with in that subsequent proceeding.

⁹ In *Trunking arrangements for the interchange of traffic and the point of interconnection between local exchange carriers*, Telecom Decision CRTC 2004-46, 14 July 2004 (Decision 2004-46), the Commission created local interconnection regions (LIRs), which group exchanges together and for which a single point of interconnection is required. This point of interconnection can be determined by a single LRN for all the exchanges grouped together in the LIR.

¹⁰ The LRN selection criteria were last updated in the Canadian CO Code (NXX) Assignment Guidelines on 10 October 2002, or prior to the release of Decision 2004-46.

66. In light of the above, the Commission determines that the porting scenarios outlined in Public Notice 2005-14 are appropriate for wireless porting activities between Canadian carriers. The Commission therefore **directs** Canadian carriers to port telephone numbers in accordance with the porting scenarios described in this Decision.

C - Service intervals to port a telephone number to and/or from a wireless carrier

Background

67. In *Incumbent local exchange carrier service intervals for various competitor services*, Telecom Decision CRTC 2003-48, 18 July 2003, the Commission determined that the service interval for the provision of LEC-to-LEC stand-alone porting¹¹ be two business days. In Public Notice 2005-14, the Commission invited comments on whether this interval was appropriate for porting numbers to and/or from wireless carriers. Parties proposing shorter service intervals were requested to comment on how any resulting additional costs should be defrayed.

Positions of parties

Service intervals for intermodal porting

Comments

68. The Companies, MTS Allstream, PIAC et al., Primus, SaskTel and TELUS indicated that they supported the recommendations made in the PwC Report for a two business day service interval for simple¹² intermodal porting for both wireless-to-wireline and wireline-to-wireless number portability. The Companies submitted that shorter service intervals were neither required nor justified, particularly in view of the high cost to modify existing systems and processes. The Companies indicated that, as was noted in the PwC Report, the experience in other jurisdictions indicated that demand for intermodal porting would be low.
69. Rogers Wireless submitted that to the extent that the LEC-to-LEC LNP process could support a 2.5 hour service interval, the same interval should also be adopted for intermodal porting.
70. PIAC et al. agreed with the current wireline-to-wireline two day service interval for all customer transfers in a wireless situation. However, it opposed any increase to this period since longer service intervals would unlikely provide consumers with real choice and opportunity to switch WSPs. PIAC et al. indicated that research had clearly shown that a key factor in consumer utilization of WNP was the time required to implement the customer transfer.

¹¹ A service interval to port a telephone number includes the time required for the exchange of customer information, confirmation of the porting due date and time, and the time to complete the number port. The porting interval may be modified by mutual agreement.

¹² The PwC Report described complex ports and simple ports as follows: a complex port is any port that is not included in the definition of a simple port. A simple port involves an account for a single line only (porting a single line from a multi-line account is not a simple port), a simple port does not include switch translations, such as Centrex, ISDN, AIN services, remote call forwarding or multiple services on the loop (DSL, etc.), a simple port may include advanced features such as Caller ID, Automatic Call Back or Automatic Redial, and a simple port does not include a reseller port request.

Reply comments

71. PIAC et al. submitted that Rogers Wireless' proposal for a 2.5 hour service interval for intermodal porting should not be adopted if the short time period created confusion and led to improperly ported numbers.

Service intervals for wireless-to-wireless porting

Comments

72. Aliant Telecom, the Companies, the CWTA, Primus, Rogers Wireless, SaskTel, TELUS and Virgin Mobile indicated that they supported the recommendations made in the PwC Report for a service interval target of 2.5 business hours for simple wireless-to-wireless porting. The CWTA submitted that the current two business day interval to port a telephone number would likely not meet customer expectations for wireless-to-wireless porting, as a customer's service is activated at time of purchase or shortly thereafter. In CWTA's view, a customer should expect a service interval of less than one business day for wireless-to-wireless porting.
73. PwC referred to a European study¹³ in which the authors concluded that the utilization of WNP was a function of both the cost and the time to complete a customer transfer. PwC indicated that its Report suggested the shorter interval of 2.5 business hours as a means to drive the use of WNP.
74. The Companies submitted that a 2.5 hour service interval for wireless-to-wireless porting would require a fully mechanized intercarrier process and significant system integration, with sensible and effective business rules and processes.
75. Aliant Telecom and SaskTel indicated that although they supported a 2.5 hour service interval target for wireless-to-wireless porting, they noted that the PwC Report recognized that this objective might be subject to some exceptions. SaskTel submitted that consideration should be given to the economic hardship that meeting the 2.5 hour target might cause to small regional wireless carriers, such as itself. Both companies submitted that as regional carriers, they should be given the latitude to use manual processes. Meeting the 2.5 hour target would require automation of a number of internal processes, the investment for which could not be justified by the anticipated volume of porting requests. Aliant Telecom indicated that it would make its best efforts to achieve the targeted 2.5 hour service interval, and committed to an interval not longer than 2 business days for simple wireless-to-wireless porting until it was economically viable to invest in system upgrades.
76. MTS Allstream indicated that it found the 2.5 hour service interval for wireless-to-wireless porting to be too onerous as it would have to develop manual processes that relied on existing systems designed to accommodate a two business day service interval. MTS Allstream expected an initial low volume of wireless porting requests.

¹³ Buehler, Stefan; Dewenter, Ralf; Haucap, Justus; *Mobile Number Portability in Europe*, July 2005.

77. MTS Allstream and TELUS submitted that incremental costs to NPAC/SMS resulting from implementing a faster service interval should be borne by the wireless industry.

Reply comments

78. The CWTA and TELUS submitted that PIAC et al.'s comment that a two business day interval for wireless-to-wireless porting was both reasonable and in line with consumer expectations, ran counter to wireless customer expectations and to PIAC et al.'s own observation that consumer utilization of WNP was related to the time to implement the customer transfer.
79. Rogers Wireless noted that the current WICIS porting process which would serve as the basis for wireless-to-wireless porting in Canada, provided for the use of a manual fax-based process as a means of satisfying the 2.5 hour interval.
80. Rogers Wireless submitted that the position taken by Aliant Telecom, MTS Allstream and SaskTel that small regional carriers couldn't afford to implement automated processes expeditiously and therefore deserved more favourable treatment than national carriers, was an attempt to retain their customer base. Rogers Wireless submitted that these companies had the financial means to provide a 2.5 hour service interval.

Service intervals for wireless reseller and MVNO porting

Comments

81. Primus and Virgin Mobile expressed concern over the recommendations in the PwC Report that all wireless reseller customer transfers should be considered as complex porting and be subject to negotiated service intervals. Both companies submitted that automatically treating wireless reseller and MVNO porting as complex was neither fair nor just and this determination should not be left solely to intercompany negotiations. Primus submitted that this recommendation appeared to violate subsection 27(2) of the *Telecommunications Act*.¹⁴ Virgin Mobile submitted that although wireless reseller and MVNO porting might involve additional steps in order to validate customer information, the validation process and relevant information fields could be streamlined to deal with this issue. Primus submitted that the Commission should direct all Canadian carriers to treat wireless reseller-originated customer transfer requests in the same way as they treat their own - either simple or complex, depending on the true nature of the customer transfer.
82. The Companies submitted that with respect to complex porting, while some situations (e.g. porting with wireless resellers) could be addressed with industry-wide negotiations, other situations would be unique in terms of the volume of numbers being ported and would require intercarrier negotiations to ensure a smooth transition for customers.

¹⁴ Subsection 27(2) reads as follows: "No Canadian carrier shall, in relation to the provision of a telecommunications service or the charging of a rate for it, unjustly discriminate or give an undue or unreasonable preference toward any person, including itself, or subject any person to an undue or unreasonable disadvantage."

83. The CWTA submitted that the service interval for wireless resellers would ultimately depend on the capabilities of their underlying carriers.
84. The Companies and TELUS noted that customer transfers involving wireless resellers' customers entailed additional steps which might not be consistent from one wireless reseller to another or from one reseller customer to another. They further noted that negotiated intervals for porting to or from resellers had been commonplace for many years in wireline telephony. In regard to Primus and Virgin Mobile's comments that wireless reseller porting should not automatically be considered complex, TELUS indicated that the definition of complex porting was similar to that used in the U.S. TELUS submitted that it was therefore somewhat inconsistent for wireless resellers to fully support the use of existing systems and structures but in this instance request a departure from the customer transfer processes and not offer any valid rationale for this position.
85. The Companies and SaskTel submitted that once processes were established and refined, the intervals possible for some wireless resellers might closely approximate or even match those achieved between wireless carriers. In the Companies' view, it would be unreasonable at the outset to impose a fixed interval for wireless resellers, because wireless carriers would want to ensure that porting involving their wireless resellers occurred as efficiently as possible since no wireless carrier would want to lose a wireless reseller's business to a competitor.

Commission's analysis and determinations

Service intervals for intermodal porting

86. The Commission notes that the current service interval for stand-alone wireline-to-wireline porting is two business days, and that LEC systems and processes were designed to meet this service interval. The Commission considers that for intermodal porting a 2.5 business hour interval could cause LECs to deploy excessive resources, incur significant costs and/or result in improperly ported telephone numbers. The Commission considers that, while parties may, by mutual agreement establish other intervals, the current LEC-to-LEC service interval of two business days is appropriate for simple intermodal porting, including simple porting involving wireless resellers or MVNOs.¹⁵
87. The Commission notes that with intermodal porting there may be a need to modify the customer transfer processes used by LECs in order to accommodate wireless carriers. In the case of wireless carriers, the Commission is of the view that timely resolution of the final customer transfer process to be used by wireless carriers is important as this process must be built into the redesign of their systems. The Commission considers that the CISC Business Process Working Group (BPWG) should address this issue and identify changes, if any, to its customer transfer processes and related documentation.

¹⁵ The Commission agrees with the definitions in the PwC Report of simple and complex porting, except for the inclusion of all reseller and MVNO porting as complex, as discussed elsewhere in this section.

88. In light of the above, the Commission determines that the appropriate service interval for simple intermodal porting, including simple porting involving wireless resellers or MVNOs, is to be the same as the LEC-to-LEC service interval for stand-alone porting, which is currently two business days. This interval may also be modified by mutual agreement. In the event the LEC-to-LEC service interval changes in the future, the service interval for intermodal porting is to be modified to adopt the same service interval. The Commission requests the CISC BPWG to identify the required changes to the customer transfer processes and related documentation to incorporate wireless-related porting and to file with the Commission a report outlining the results of its investigation, within 60 days from the date of this Decision.

Service intervals for wireless-to-wireless porting

89. The Commission acknowledges that customers expect their wireless service to be functional very shortly after they obtain their wireless service or handset, and that shorter service intervals for WNP can lead to higher utilization.
90. The Commission notes that a 2.5 business hour service interval for wireless-to-wireless porting could be supported by automated processes developed in the U.S. (i.e. WICIS) that have been used, with modifications, by U.S. wireless carriers since late 2003. The Commission further notes that the WICIS process has provisions for a manual fax process that can support a service interval of 2.5 business hours. The Commission notes that the PwC Report recommends that this process be used in Canada. The Commission considers that the advantages for customers and competitive WSPs of a reduced service interval outweigh the effort and cost of implementation.
91. The Commission notes that new wireless-to-wireless customer transfer processes will need to be developed by the wireless carriers to support the targeted 2.5 business hour porting process. While the wireless industry could form a working group to develop these procedures, the Commission is of the view that it would be preferable if they were developed under CISC since it is an open forum with a dispute resolution process. Also, the CISC group's results would be the subject of a Commission determination, thereby making these processes and procedures binding on all parties in the industry.
92. In light of the above, the Commission determines that the appropriate service interval for wireless-to-wireless simple porting is 2.5 business hours. The Commission further determines that this interval may only be modified by mutual agreement.
93. The Commission requests CISC to establish an ad hoc working group for the development of wireless-to-wireless customer transfer processes if requested to do so by the wireless carriers or the CWTA. In the event that CISC forms an ad hoc working group, CISC is to file a report with the Commission for a Commission determination within 180 days from the date of this Decision.

Service intervals for wireless reseller and MVNO porting

94. The Commission notes the concern that wireless reseller and MVNO porting is considered complex, which would not be subject to a targeted service interval of 2.5 business hours. It should be noted that the 2.5 business hour service interval is the entire interval for transferring a customer between wireless carriers. The actual service interval is two hours, leaving one

half-hour for the carrier exchange of information, agreement on the customer transfer and entry of the transfer in the number porting system (NPAC). The Commission notes that additional steps would be required by a wireless carrier to obtain confirmation of customer information from a wireless reseller or MVNO. The time required for this further exchange of information depends on the capabilities of a wireless reseller or MVNO.

95. The Commission considers that wireless resellers and MVNOs should not be disadvantaged relative to wireless carriers. Some wireless resellers and MVNOs will be able to put in place processes and/or systems with their underlying carriers to permit the rapid exchange of customer information for all their simple wireless-to-wireless porting requests. The Commission notes that such arrangements will require negotiations between wireless resellers and MVNOs and their underlying carriers.
96. Accordingly, the Commission determines that the appropriate service interval for wireless reseller or MVNO simple porting is 2.5 business hours if the wireless reseller or MVNO can provide the required customer information to its underlying carrier so that the one-half hour time period allocated in the porting process to complete the intercarrier process can be met. Where a wireless reseller or MVNO is unable to provide the required information in time for a 2.5 business hour port, the wireless reseller or MVNO and the underlying wireless carrier are to negotiate a mutually acceptable service interval, to a maximum interval of that used for intermodal porting.
97. The Commission determines that wireless reseller and MVNO porting is to be considered complex only when a wireless reseller and MVNO cannot provide their carrier with the necessary customer information so that the one-half hour time period allocated in the porting process to complete the intercarrier process can be met. Otherwise, wireless reseller and MVNO wireless-to-wireless porting is to be treated as simple porting.

Service intervals for wireless complex porting

98. The Commission notes that the service interval for wireline-to-wireline complex porting is subject to bilateral negotiations on a case-by-case basis. The Commission considers that the same approach is also suitable for wireless complex porting, except for wireless reseller and MVNO simple wireless-to-wireless porting that is subject to the service intervals noted above.
99. Accordingly, the Commission determines it appropriate that the service interval for complex porting (other than wireless reseller and MVNO simple wireless-to-wireless porting) be subject to bilateral negotiations on a case-by-case basis.

D - WNP implementation time frames

Background

100. In its covering letter to the PwC Report, the CWTA indicated that it supported the Report's conclusions to implement WNP by 12 September 2007. This date would see WNP launched in

all locations where LNP currently exists, as well as Regina and Saskatoon. The CWTA further indicated that for all other locations where LNP does not exist, WNP would be introduced within Commission-approved time periods¹⁶ upon wireless carrier notification to an ILEC.

101. In Public Notice 2005-14, the Commission invited comments on PwC's report as it relates to the time frame for implementing WNP, or comments on any other proposals, such as a phased approach, that could shorten the implementation time frame.

Positions of parties

102. The Companies, the CWTA, MTS Allstream and TELUS supported the PwC recommendation for a national implementation date of 12 September 2007 for WNP. Although Aliant Telecom and SaskTel supported this date, they considered the time frame to be very challenging.
103. The PwC Report calls for a 6-month planning phase, an 8-month development phase, and a 10-month testing phase (including a 4-month trial period). The CWTA indicated that its Board of Directors had approved recommendations to create a WNP Project Management Office to oversee the implementation of WNP until the end of 2007. The CWTA also indicated that discussions had commenced regarding WICIS for WNP and the Intercarrier Communication Process clearinghouse.
104. Virgin Mobile submitted that with sufficient organization and prioritization by the Commission, WNP implementation could occur in less than 12 months.
105. The members of the public who commented in this proceeding were unanimously in favour of WNP and, except for one person, requested it sooner than the proposed implementation date of 12 September 2007.
106. The CWTA and TELUS indicated that, to their knowledge, the PwC Report was the only comprehensive assessment of WNP implementation in Canada. In the CWTA's view, it should therefore guide the implementation of WNP in Canada. The CWTA indicated that it had taken from two to seven years for other countries to introduce wireless-to-wireless porting.¹⁷ It noted that only the U.S. had implemented intermodal portability as contemplated in the PwC Report, with many customers still without access.
107. The CWTA submitted that, without substantiating their claims, critics of the PwC plan had ignored the fact that WNP was a massive and enormously complex undertaking. The CWTA indicated that implementing WNP required that (i) rules and processes be established, (ii) networks, billing and customer care systems, and processes be extensively redesigned and reworked, and (iii) internal employees and employees in distribution channels be retrained, all of which will entail investments of hundreds of millions of dollars.

¹⁶ In a letter dated 8 April 1999, the Commission approved a number of consensus reports, one of them being RORE03B entitled *Consensus on Request Driven Rollout Process*.

¹⁷ As noted in the PwC Report, time frames for the implementation of WNP in other countries: Hong Kong, 2 years; United Kingdom and Ireland, 3 years; Australia, 4.5 years; Japan, 5 years; and the U.S., 7 years.

108. The CWTA submitted that it disagreed with a phased introduction of WNP which, in its view, contemplated accelerated availability of WNP for some customers, carriers or regions, and delayed availability for others. The CWTA indicated that a phased approach had been eliminated by PwC in its plan on the basis that it would save little time and would increase the cost and complexity of WNP implementation.
109. According to the CWTA, the introduction of WNP in the U.S. greatly inconvenienced millions of customers because it was introduced at the wrong time of the year, namely, Thanksgiving, and without adequate testing. The CWTA submitted that Canadian consumers should not be subjected to negative consequences arising from arbitrary and unreasonable time frames.
110. TELUS submitted that as over 40 percent of annual sales in the wireless industry occurred in the fourth quarter, it was essential that WNP not be introduced during this time, particularly over the Christmas period when the wireless industry freezes all system changes.
111. Aliant Telecom indicated that it would be implementing a major wireless systems upgrade over the same time frame as WNP implementation. It submitted that mandating an earlier implementation date would force an unfair and unreasonable economic hardship upon it as a result of its planned systems upgrade.
112. SaskTel indicated that under the proposed 24-month time frame, it would have to make changes to virtually every operating system and database within its mobility division. SaskTel submitted that the 10-month testing phase incorporated into the PwC plan was critical.
113. MTS Allstream indicated that if a phased approach was adopted such that the large national wireless carriers were required to implement wireless-to-wireless number portability earlier than September 2007, as a regional carrier, it would still need a two-year time frame.
114. Rogers Wireless noted that most carriers agreed that a phased approach to implement WNP would be costly in that it would require carriers to duplicate their efforts and prolong the time frame during which the entire implementation would be completed. It submitted that it would be unfair to a national carrier such as itself if any competing regional wireless carrier was permitted to provide WNP at a later date.
115. Virgin Mobile submitted that a phased approach for WNP would facilitate earlier implementation. Virgin Mobile submitted that adopting U.S. products and adapting them to Canadian requirements would facilitate a more streamlined and expeditious implementation of WNP. In its view, WNP should be introduced by the fall of 2006.
116. PIAC et al. supported a 6-month implementation time frame, from the date of the Decision on this proceeding, for wireless-to-wireless porting, with other types of wireless porting to follow. PIAC et al. submitted that it was in the public interest for the largest number of residential subscribers to obtain WNP as quickly as possible. PIAC et al. submitted that if residential customers were served first, the time of WNP implementation for larger customers with more bargaining power than the average consumer would likely bring about WNP more quickly than the reverse scenario.

Commission's analysis and determinations

117. The Commission notes that the comments made on an appropriate start date for WNP in this proceeding fell into two categories: the wireless carriers and the ILECs submitted that 12 September 2007 was a reasonable and realistic date, while the consumer groups, the wireless reseller/MVNOs and all members of the public who commented, except for one person, considered that WNP should be implemented sooner than 12 September 2007.
118. The Commission notes the PwC Report's recommendation that an "all at once everywhere" national start date is equitable to all carriers and customers. At the same time, the Commission notes that in Telecom Order CRTC 98-60, 29 January 1998, it ordered the roll-out of wireline LNP on a two-phased priority basis for different geographic areas, spread over a 9-month period. The Commission considers that it would be desirable to employ a phased approach if it resulted in WNP being available to a significant number of consumers sooner.
119. The Commission considers that all WSPs should have the same ability to port customers when WNP is introduced. The Commission therefore considers that both simple and complex porting, as well as porting by wireless resellers and MVNOs, must be supported when WNP is introduced, even under a phased roll-out.
120. The Commission notes the three main phases recommended in the PwC Report for implementing WNP. The first two phases of planning and development, including internal system testing, would be completed by mid-December 2006. The third phase, for testing, would be divided into three periods:
 - (i) pilot testing for approximately three months (15 December 2006 to 30 March 2007), in London, Ontario between Bell Canada, Bell Mobility, Roger Wireless and the mobility division of TELUS;
 - (ii) phase A testing for approximately two months (20 April 2007 to 27 June 2007), between Bell Mobility, Rogers Wireless, the mobility division of TELUS, Primus and Virgin Mobile; and
 - (iii) phase B testing for approximately three months (14 June 2007 to 11 September 2007), between regional wireless carriers, national wireless carriers and ILECs.
121. The Commission recognizes that WNP affects practically every operating and support system of a wireless carrier, and that adequate time must be allocated for modifications to be made.
122. The Commission considers that the most challenging testing requirements are those at the initial phase when the modifications are made to carriers' internal systems. The Commission considers that testing at subsequent phases is somewhat less challenging, since it focuses on intercarrier systems and processes, most of which have been in commercial use for many years in Canada and the U.S. The Commission notes, for example, that the Canadian NPAC/SMS has been in use since mid-1998, that intermodal porting will generally follow the LEC-to-LEC customer transfer process, and that the wireless-to-wireless process (WICIS) has been in use in the U.S. since November 2003.

123. The Commission has reviewed the testing schedule recommended in the PwC Report and notes that much of the testing is done serially rather than in parallel. The Commission considers that if elements of the pilot testing are performed in parallel, it could be completed in much less time than that allocated in the PwC's plan. The Commission further considers that the Phase A testing, with the only new participants from the pilot test being Primus, TELUS and Virgin Mobile, could be completed in less than the time allocated in the PwC Report, thereby permitting WNP to be introduced in British Columbia, Alberta, Ontario and Quebec, where LEC-to-LEC LNP is already in place, by 14 March 2007.
124. The Commission notes that some of the regional wireless carriers are planning to upgrade their wireless systems over the same period that WNP is being introduced, thereby adding time constraints and an element of risk for these carriers. The Commission considers, however, that a phased approach for WNP could cause some difficulties and confusion for national or cross-regional customers, if only a portion of a customer's account can be moved to a porting wireless carrier in the provinces of British Columbia, Alberta, Ontario and Quebec, but not in the remaining provinces.
125. The Commission notes that porting out a customer essentially entails the same process as disconnecting a customer. The Commission therefore considers that as of 14 March 2007, all wireless carriers should support, at a minimum, the porting-out of wireless numbers wherever LEC-to-LEC LNP is available, as well as Regina and Saskatoon. The Commission further considers that both porting in and porting out should be implemented in all other locations where LEC-to-LEC LNP is available, as well as Regina and Saskatoon, no later than 12 September 2007. Wireless carriers operating in these areas can implement full WNP any time on or after 14 March 2007 if they so desire.
126. The Commission considers that where wireless porting in and/or porting out is implemented, it will be necessary for all LECs to support intermodal porting.
127. The Commission notes the CWTA's intention to create a WNP Project Management Office in order to move forward with WNP implementation. The Commission considers the creation of a WNP Project Management Office to be a positive measure in the implementation of WNP.
128. In light of the above, the Commission **directs**:
 - (i) Bell Mobility, Rogers Wireless and the mobility division of TELUS to implement WNP in British Columbia, Alberta, Ontario and Quebec, where LEC-to-LEC LNP is already in place, by 14 March 2007. Where LEC-to-LEC LNP is already in place elsewhere, as well as Regina and Saskatoon, these wireless carriers operating in these areas must also implement porting-out by 14 March 2007, may implement porting-in on or after 14 March 2007, and must implement porting-in by 12 September 2007;

- (ii) all other wireless carriers to implement, at a minimum, the porting-out of customers where LEC-to-LEC LNP is already in place, as well as Regina and Saskatoon, by 14 March 2007. In these areas, they may implement porting-in any time on or after 14 March 2007, and must implement porting-in by 12 September 2007; and
 - (iii) for all other locations where LNP does not exist, WNP would be introduced within Commission-approved time periods set out in consensus report RORE03B, entitled *Consensus on Request Driven Rollout Process*, upon wireless carrier notification to an ILEC;
 - (iv) that both simple and complex porting be supported when either wireless number porting-in or porting-out commences; and
 - (v) all LECs to support the porting-in and out of telephone numbers with wireless carriers within the time frames set out above.
129. The CWTA is to file quarterly reports in order to inform the Commission of the wireless industry's progress in implementing WNP. The first such report is to be filed by 31 January 2006, to cover the period since the PwC Report was released.

Secretary General

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