



Telecom Decision CRTC 2007-23

Ottawa, 12 April 2007

Rogers Wireless Partnership Part VII application regarding the requirement for a central office code in each served exchange

Reference: 8620-R11-200610966

In this Decision, the Commission approves Rogers Wireless Partnership's request to change wireless competitive local exchange carriers' (CLEC) obligations so that they must acquire at least a single central office code and location routing number (LRN) per local interconnection region in which they provide local service, rather than per incumbent local exchange carrier exchange. The Commission also extends this change to apply to all CLECs.

The Commission requests that the CRTC Interconnection Steering Committee Canadian Steering Committee on Numbering make the necessary changes to the Canadian Central Office Code (NXX) Assignment Guidelines to incorporate the changes in CLEC obligations and LRN assignment criteria as specified in this Decision.

Introduction

1. The Commission received an application by Rogers Wireless Partnership, on behalf of itself and Fido Communications Inc. (Fido) (collectively Rogers Wireless), dated 30 August 2006, pursuant to Part VII of the *CRTC Telecommunications Rules of Procedure*, regarding central office (CO) and local routing number (LRN) requirements for wireless competitive local exchange carriers (CLECs). In the application, Rogers Wireless requested that wireless CLECs be permitted to satisfy their local service obligations by having at least one CO code and one LRN per local interconnection region (LIR) in which they provide local service, rather than per each incumbent local exchange carrier (ILEC) exchange.
2. Rogers Wireless submitted that this change would:
 - align the CO code requirements and LRN practices that apply to wireless CLECs with the LIR regime established by the Commission;
 - contribute to the conservation of scarce telephone number resources since a significantly smaller number of CO codes would be required by wireless CLECs to provide local service and port telephone numbers within a given area; and
 - permit wireless CLECs to port telephone numbers in a similar manner to wireless service providers (WSPs) and allow them to compete more effectively with WSPs.

3. Rogers Wireless also submitted that there were no technical impediments associated with its proposed changes.
4. Rogers Wireless requested that the Commission deal with the application quickly so that its decision could be reflected in the industry-wide planning activities that were then underway for the implementation of wireless number portability (WNP).
5. The Commission received comments from Cogeco Cable Inc. (Cogeco); from Bell Aliant Regional Communications, Limited Partnership, Bell Canada, and Saskatchewan Telecommunications (SaskTel) (collectively the Companies); and from TELUS Communications Company (TCC). The record of this proceeding closed with Rogers Wireless's reply comments, dated 23 October 2006.

Background

6. In *Local competition*, Telecom Decision CRTC 97-8, 1 May 1997 (Decision 97-8), the Commission determined, among other things, that CLECs must have at least one CO code and one point of interconnection (POI) for each exchange in which they provide local service.
7. 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, among other things, modified the interconnection regime for local exchange carriers (LECs) by aggregating exchanges into larger LIRs.
8. In *Implementation of wireless number portability*, Telecom Decision CRTC 2005-72, 20 December 2005 (Decision 2005-72), the Commission set out the regulatory framework for WNP. In that Decision, the Commission permitted wireless carriers to have direct access to the Canadian number portability systems, determined the customer transfer periods to be followed for porting activities involving wireless carriers, determined the situations when a telephone number could be transferred to or from wireless carriers, and set the start date for WNP at 14 March 2007.
9. In *Regulatory issues related to the implementation of wireless number portability – Follow-up to Public Notice 2006-3*, Telecom Decision CRTC 2006-28, 18 May 2006 (Decision 2006-28), the Commission made a number of determinations regarding the regulatory regime for WNP. One of these determinations was that WSPs did not have to obtain a CO code for each exchange in which they provided wireless service. Instead, the Commission specified that WSPs must have a CO code and an LRN per POI per ILEC local calling area (LCA) where they would be porting numbers.
10. In *Follow-up to Trunking arrangements for the interchange of traffic and the point of interconnection between local exchange carriers*, *Telecom Decision CRTC 2004-46*, Telecom Decision CRTC 2006-35, 29 May 2006, the Commission approved revised definitions of the LIRs and approved on a final basis the interconnection rates for the termination of CLECs' intra-LIR traffic.

The issues

11. The Companies and TCC generally opposed Rogers Wireless's proposal on the grounds that one CO code per exchange was required to maintain the integrity of the exchange system, that the proposal would create a third interconnection regime applicable only to wireless CLECs, and that there was no urgent need to conserve numbering resources. TCC questioned the appropriateness of the Part VII process to deal with this issue, arguing that a public notice process would be more appropriate.
12. Cogeco supported Rogers Wireless's proposal on the condition that the Commission extend the changes to all CLECs. It argued that there were no routing, rating, or billing impediments that would prevent implementing Rogers Wireless's proposal and that there would be no need to dismantle current exchange-level arrangements. Cogeco suggested that CLECs should be able to select arrangements at either the exchange level or the LIR level.
13. In order to determine whether it would be appropriate to permit wireless CLECs to satisfy their local service obligations by having at least one CO code and one LRN per LIR, rather than per ILEC exchange, the Commission will consider the following issues raised by parties in this proceeding:
 - Is the integrity of the exchange-based system impacted by Rogers Wireless's proposal?
 - Should Rogers Wireless's proposal apply to all CLECs?
 - Are LRNs technically required at the exchange level?
 - Is conservation of numbering resources a consideration?
 - Is the Part VII process appropriate for this application?
 - What is the impact on numbering assignment guidelines?

Is the integrity of the exchange-based system impacted by Rogers Wireless's proposal?

Positions of parties

14. TCC noted that in Decision 97-8, the Commission had recognized that the exchange system was "both integral and necessary to the general functioning of the network" and had concluded that CLECs must have at least one CO code for each served exchange. TCC submitted that while some of the original reasons for a CLEC to have a CO code in each served exchange – such as toll contribution – might no longer be valid, others – such as rating and routing of toll calls – did remain valid, at least to some degree.
15. Cogeco submitted that it would not be necessary to dismantle existing arrangements for CO codes associated with LRNs on an exchange basis and that the Commission should grandfather such arrangements. It proposed that, going forward, the Commission permit CLECs to implement, at their discretion, CO codes on either an exchange basis or an LIR-wide basis.

16. Cogeco argued that there were no routing, rating, or interconnection impediments to LIR-wide local number portability (LNP).
17. Cogeco noted that in *Canadian Cable Telecommunications Association – Part VII application regarding the application of some competitive local exchange carrier (CLEC) obligations to certain CLECs*, Telecom Decision CRTC 2006-58, 18 September 2006 (Decision 2006-58), the Commission had noted that Aliant Telecom Inc.,¹ Bell Canada, SaskTel, and Société en commandite Télébec had opposed granting relief from the CLEC obligation to obtain one CO code per exchange on the basis that a CO code per exchange was necessary for the proper rating, routing, and billing of long distance calls. Cogeco submitted that in light of the Commission's determinations related to the implementation of WNP, this objection was now not only irrelevant, but also moot.
18. Cogeco submitted that as long as the ported telephone number continued to be associated with its original rate centre designation, both local versus long distance call determination for LECs and long distance call rating and billing would continue to be based on the originating telephone number and the dialed telephone number.
19. Cogeco argued that since Decision 2004-46 had created the condition for traffic associated with a grouping of exchanges to be routed to a single POI, with that POI identified by an LRN, the implementation of LIR-wide LNP would need no additional POIs or the relocation of existing POIs.
20. Cogeco noted that under the WNP regime established in Decision 2006-28, a ported telephone number remained associated with the ILEC exchange area where the number was originally assigned, but the traffic associated with the ported number could be routed across exchange boundaries within the ILEC LCAs.
21. In its reply comments, Rogers Wireless noted that the Commission had already found that routing across exchange boundaries was technically feasible and submitted that, therefore, TCC's concern regarding the exchange system was without merit.
22. Rogers Wireless agreed with Cogeco's argument that the basis for the ILECs' objection to the removal of the CLEC requirement for one CO code per ILEC exchange was no longer valid given that routing ported traffic across exchange boundaries was technically feasible and that the rating and billing of such traffic would not change.
23. Rogers Wireless also agreed with Cogeco that existing CLEC arrangements should be grandfathered and that CLECs, at their discretion, should be permitted to continue to use CO codes and LRNs on an exchange basis.

¹ On 7 July 2006, Bell Canada's regional wireline telecommunications operations in Ontario and Quebec were combined with, among other things, the wireline telecommunications operations of Aliant Telecom Inc., Société en commandite Télébec, and NorthernTel, Limited Partnership to form Bell Aliant Regional Communications, Limited Partnership.

Commission's analysis

24. The Commission notes TCC's submission that while some of the reasons for a CLEC to have at least one CO code in each served exchange may no longer be applicable, other reasons – such as routing and rating of toll calls – remain valid to some degree. The Commission notes that it dealt with the routing and rating of CLEC- and WSP-related traffic in several past proceedings when it dealt with the establishment of LIRs² for LECs and the implementation of WNP for WSPs.³ The Commission considers that its determinations in those proceedings have addressed TCC's concerns regarding the need for a CO code per each served exchange.
25. The Commission notes that one of the reasons CLECs are currently required to obtain a CO code in each served exchange is so that an LRN can be selected and assigned for routing traffic to ported telephone numbers.
26. Under the original rules for local competition, CLECs were required to obtain a CO code per exchange so that an LRN could be assigned to each POI in each exchange. In Decision 2004-46, the Commission changed the rules by creating LIRs in which a single POI could be used to aggregate and exchange traffic between carriers for a number of exchanges but maintained the requirement for CLECs to obtain a CO code per served exchange.
27. In Decision 2006-28, the Commission determined that WSPs could exchange traffic at a single POI within an ILEC LCA and that it was only necessary to have a single LRN to identify this POI. To this end, WSPs were not required to obtain a CO code and assign an LRN from that CO code in each served exchange. The Commission noted that the rating and the billing of traffic were not affected by this change and that it considered, therefore, that the change had no impact on the integrity of the exchange system.
28. The Commission notes that while it determined that WSPs do not have to obtain a CO code for each served exchange, they must still obtain CO codes for those exchanges where they wish to provide customers with telephone numbers. The Commission also notes that these telephone numbers must have the same exchange information characteristics – including rating and billing information – as the CO code for the telephone numbers; however, the LRN may vary by telephone number.
29. The Commission agrees with the view that permitting traffic routing on an LIR-wide basis will not create any rating or billing impediments since none occurred when the Commission permitted routing on an LCA-wide basis for WNP. The Commission also agrees with the view that current arrangements at the exchange level do not need to be dismantled and that they can be maintained. Furthermore, the Commission considers that there may be instances where there is sufficient traffic to warrant traffic exchange at the exchange level.
30. The Commission also considers that if a CLEC wishes to assign telephone numbers to customers in an exchange, it is required to obtain a CO code for that exchange for that purpose. The Commission further considers that it has already found that exchange system integrity can be maintained when traffic is routed and exchanged between carriers outside of an exchange area.

² Decision 2004-46.

³ Decision 2005-72.

31. Accordingly, the Commission concludes that the integrity of the exchange system can be maintained when a single LRN is assigned for use in a number of exchanges as long as the other numbering information for individual telephone numbers remains associated with the CO code of the telephone numbers.

Should Rogers Wireless's proposal apply to all CLECs?

Positions of parties

32. Rogers Wireless submitted that while the Commission required WSPs to have a minimum of one CO code, one LRN, and one POI per LCA where they would be porting telephone numbers, wireless CLECs were still required to have a CO code, an LRN, and a POI per exchange in which they provided service. The company was of the view that these requirements placed wireless CLECs at a competitive disadvantage to WSPs and that it was time to take the next logical step and create a more efficient local interconnection regime for wireless CLECs.
33. The Companies and TCC shared the view that granting Rogers Wireless's request would create an additional interconnection regime associated with a specific technology or particular business plan, which would create inequity among WSPs, wireless CLECs, and wireline CLECs. TCC argued that to the extent that Fido required changes to the numbering regime to better compete with WSPs, so did all LECs.
34. The Companies submitted that to date the Commission had consistently maintained a principle of technological neutrality regarding the application of CLEC obligations and that this principle should be maintained. They also submitted that Rogers Wireless's proposal would add a layer of complexity to the network from a switching, routing, and operations perspective, in order to differentiate routing requirements based on the type of carrier, as well as the type of CLEC.
35. The Companies noted that LIRs included many exchanges and their boundaries did not align with those of ILEC LCAs. The Companies were of the view that the lack of consistency between LCAs and LIRs would create barriers to an end-customer's ability to change local service providers. They suggested that customers could port to a wireless CLEC and retain their current number, but there might be instances where they would not be able to subsequently move to a LEC and retain the same telephone number.
36. Cogeco noted that to the extent that the approval of Rogers Wireless's proposal would apply to all CLECs, it strongly supported the company's application. It urged the Commission to remove the barrier to entry represented by the current LNP rules and to level the playing field between wireline and wireless carriers.
37. Cogeco submitted that LIR-wide LNP implementation would improve the efficiency of the local interconnection model and favour local competition entry. It was of the view that LIR-wide LNP would remove an economic barrier to CLEC entry into smaller exchanges, where there were fewer potential customers generating low traffic volumes over a long period.

38. Cogeco also submitted that with the introduction of WNP into the voice market, the establishment of two sets of porting rules would create an unfair competitive environment. Cogeco argued, therefore, that in order to level the playing field, it was critical that the LNP rules sought by Rogers Wireless for wireless CLECs should also be extended to all CLECs.
39. Rogers Wireless submitted that it was not opposed to its proposal being applicable to all CLECs and that the changes it sought were entirely practical, straightforward, and within the grasp of the current industry planning and implementation activities for WNP.

Commission's analysis

40. The Commission considers that the Companies' concern regarding the ability of customers to retain their phone numbers when moving between wireless CLECs and LECs is not related to the use of LRNs. In the Commission's view, this ability is instead a function of the mobility aspect of wireless services since, unlike wireline service, wireless service is not provided to a specific location or address. The Commission notes that it dealt with the issue of customers transferring between wireless and wireline carriers in Decision 2005-72, when it dealt with the various porting scenarios involving WSPs. Therefore, the Commission considers that this issue is not relevant to Rogers Wireless's current proposal.
41. The Commission notes that it has essentially put in place two local service interconnection regimes, with one applicable to WSPs and the other applicable to CLECs. With the introduction of WNP, the Commission modified the WSP interconnection regime to permit WSPs to interconnect with a single POI and LRN per ILEC LCA.
42. The Commission notes that the current numbering rules and obligations are the same for all CLECs. In addition, all CLECs are under the same routing requirements and obligations for the exchange of traffic between carriers. The Commission considers that if it were to evaluate Rogers Wireless's application solely based on its applicability to wireless CLECs, it would be creating a CLEC obligation associated with a particular technology. The Commission also considers that this could create a third interconnection regime available to a particular type of CLEC.
43. Regarding Cogeco's comments that granting Rogers Wireless's proposal would further competitor equity for CLECs, the Commission notes that with the introduction of LIRs in Decision 2004-46, CLECs are no longer required to have physical facilities, such as a POI, within each served exchange. However, the Commission considers that the requirement that CLECs must have a CO code for each served exchange means that some form of presence is still required by exchange, which may be problematic for some CLECs and should not be required under the LIR routing rules.
44. The Commission agrees with the view that Rogers Wireless's proposal would remove one of the barriers to CLECs providing local competition in smaller exchanges where it might be otherwise uneconomic to do so.
45. The Commission considers, therefore, that to the extent that all wireless and wireline CLECs are bound by the same rules and obligations for the use of numbering resources and the routing of traffic, it would be appropriate to consider Rogers Wireless's proposal on the basis of its

applicability to all CLECs, and not just wireless CLECs. The Commission notes that such an approach would also maintain the Commission's approach of common regulatory rules regardless of technology and that two broad interconnection regimes would remain – one for WSPs and the other for all CLECs.

Are LRNs technically required at the exchange level?

Positions of parties

46. Rogers Wireless submitted that in Decision 2006-28, the Commission had noted that one of the reasons for requiring a CO code per exchange was for the assignment of an LRN per exchange so that ported traffic could be routed to the POI in each exchange. Rogers Wireless noted the Commission's comment that with the establishment of routing ported traffic across exchange boundaries on an LIR basis to a single POI, it was no longer necessary to have a CO code in each exchange for routing purposes.
47. Rogers Wireless requested that the criteria for LRN assignments be changed so that CO codes would be used more efficiently in the creation of LRNs. It noted that in Decision 2006-28, the Commission had requested that the CRTC Interconnection Steering Committee Canadian Steering Committee on Numbering (CSCN) update the LRN selection criteria to reflect that WSPs could have one CO code and one LRN for each LCA where porting activity occurred. Rogers Wireless submitted that it would be appropriate to modify the LRN selection criteria so that wireless CLECs could be permitted to have one LRN for each LIR in which they ported telephone numbers.
48. Rogers Wireless noted that the Industry Numbering Committee LRN selection criteria in use in the United States explicitly required the assignment of a single LRN per local access and transport area (LATA) and explicitly precluded the assignment of LRNs per ILEC exchange. It submitted that LATAs were analogous to LCAs and LIRs in that each one aggregated exchanges into larger geographical areas that could encompass multiple LCAs. Rogers Wireless submitted that given the approach to LRN assignment in the United States and that the Commission had already permitted CLECs to establish a single POI per LIR, it would be appropriate for wireless CLECs to be able to assign a single LRN per POI rather than per each ILEC exchange.
49. The Companies submitted that Rogers Wireless had failed to provide any evidence of the benefits or need to align one small portion of the Canadian interconnection regime with that in the United States. TCC submitted that Canadian directions and policies should be established by the Commission and there was no compelling reason for adopting rules that were identical to those established in the United States. The Companies submitted that the Commission had established the CLEC obligations after a thorough examination of the Canadian market. They suggested that while practices in other countries might be interesting, that did not necessarily make them appropriate for the Canadian market or regulatory regime.
50. Cogeco noted that if LRNs were assigned on an LIR-wide basis, the requirements in the Canadian Central Office Code (NXX) Assignment Guidelines for the assignment of LRNs would be less burdensome and, hence, regulation would be more efficient and effective.

Cogeco submitted that this change would also favour the attainment of the objective set out in paragraph 7(f) of the *Telecommunications Act* by ensuring that where regulation was required, it was efficient and effective.

51. Rogers Wireless replied that the concerns raised by both the Companies and TCC regarding the harmonization of Canadian practices for the assignment of LRNs with those of the United States had missed the point and that it had referenced the United States guidelines to demonstrate that its proposal was technically feasible.

Commission's analysis

52. The Commission considers that Rogers Wireless's reply comments have addressed the Companies' and TCC's concerns regarding the harmonization of Canadian LRN selection criteria guidelines with those in use in the United States.
53. The Commission considers that since Canada and the United States share a common integrated numbering system and since it is not necessary for telecommunications networks in the United States to have an LRN assigned per exchange, it is possible for Canadian telecommunications networks to function with LRNs assigned and used at a level beyond that of the exchange.

Is conservation of numbering resources a consideration?

Positions of parties

54. Rogers Wireless suggested that if wireless CLECs were permitted to have a single CO code per LIR, rather than per exchange, there would be significant savings in the number of CO codes required to serve all exchanges within an LIR.
55. The Companies and TCC submitted that the Commission had recently dismissed the validity of Rogers Wireless's concerns regarding the need to conserve numbering resources. They noted that in Decision 2006-58, the Commission had stated that it considered that numbering exhaust might not be as significant a concern at that time as it had been in 2004.
56. Cogeco argued that allowing CLECs to obtain CO codes per LIR would help to conserve numbering resources and contribute to the use of telephone numbers in a more rational and efficient manner that was consistent for all competing Canadian wireless and wireline carriers. Cogeco submitted that in Decision 2006-28, the Commission had noted that one of the advantages of not requiring WSPs to have a CO code for every exchange covered by their networks was avoiding premature number exhaust in some numbering plan areas (NPAs).
57. Cogeco noted that section 2.2 of the Commission-approved Canadian Central Office Code (NXX) Assignment Guidelines, Version 7, dated 26 January 2006, states that:

NANP⁴ numbering resources shall be assigned to permit the most effective and efficient use of a finite numbering resource in order to prevent premature exhaust of the NANP and delay the need to develop and

⁴ NANP stands for North American Numbering Plan.

implement costly new numbering plans. Efficient resource management and Code conservation are necessary due to the impacts of expanding the numbering resource (e.g., NANP expansion from 10 to 11 or more digits).

58. In response to the Companies' and TCC's comments, Rogers Wireless noted that under the current rules, Fido would need to acquire a large number of CO codes in a number of LIRs across Canada. Rogers Wireless submitted that it was undeniable that these assignments would accelerate NPA exhaust in Canada and that the Companies and TCC had avoided this fact in their comments.

Commission's analysis

59. The Commission notes that in Decision 2006-58, it stated that "...numbering plan area exhaust *may not* be as significant a concern now as it was in 2004." [emphasis added] However, the Commission considers that it is vitally important for the NANP to last for as long as possible in its current format.
60. The Commission is concerned that, as demonstrated with the introduction of WNP, the quantity of CO codes required by CLECs under the current rules could significantly advance code exhaust in some Canadian NPAs. The Commission notes that the introduction of new relief NPAs represents significant costs to all Canadian telecommunications service providers and that it can be both costly and disruptive to the public. The Commission considers that code conservation measures are important and should be undertaken wherever possible. As such, the Commission considers that Rogers Wireless's proposal has merit since it would result in a more efficient use of numbering resources.

Is the Part VII process appropriate for this application?

Positions of parties

61. With respect to Rogers Wireless's request that the Commission deal with its application quickly so that the outcome could be reflected in the industry-wide planning for WNP, the Companies submitted that the industry was past the planning stage and was now well into the implementation stage for WNP. The Companies also submitted that the request for a fast-track implementation was ill-founded since such an implementation would lack the benefit of full consideration of the technical, operational, and financial implications of Rogers Wireless's proposal. The Companies submitted, further, that the industry was fully engaged and focused on implementing WNP by 14 March 2007 and that it would be inappropriate to introduce further complexities into that process.
62. TCC submitted that a number of industry participants, such as interexchange carriers, rebillers, and resellers, might have incorporated the rating and routing regimes established in Decision 97-8 into their business models, service agreements, and systems, and that they should be given the opportunity to be heard on this type of change. TCC also submitted that the limited process associated with a Part VII application might not be adequate to identify or resolve all issues related to Rogers Wireless's proposal. TCC indicated that while it was not opposed to

changes in the competitive regime, it believed that these changes should be made in an open and fair manner so that all parties might comment, and that this should be done in a public notice proceeding.

63. In its reply comments, Rogers Wireless argued that the Part VII process was an open, fair, and legitimate means to address the changes it sought and that there was nothing in the Part VII process that prevented any interested party from expressing its views. Rogers Wireless noted that in 2006, TCC had filed 11 Part VII applications regarding various issues, many of which had directly affected competitors. It argued that, therefore, the concerns expressed by TCC regarding other competitors were without merit.

Commission's analysis

64. The Commission notes that the Part VII process is an open process that provides all interested parties with the opportunity to present their concerns regarding the issues associated with the topic(s) included in a particular Part VII application. The Commission also notes that parties that might be affected by the issues in any Part VII application can choose to submit comments or not. The Commission considers, therefore, that to the extent that parties do not file comments, it can be taken that the issues raised in a Part VII application are not a concern to them.
65. The Commission considers that many of the concerns raised by the Companies and TCC have already been dealt with in previous proceedings. Given the comments received from both the ILEC and the CLEC sides of the marketplace, and the fact that other parties had the option to submit comments, the Commission considers that the record in this proceeding is sufficient for it to make a determination.
66. The Commission notes that the Companies expressed concern that a fast-track implementation of Rogers Wireless's proposal might be problematic to the industry since it was fully engaged in implementing WNP, and that it would be inappropriate to add further complexities at this time.
67. As noted previously, the Commission considers that it would not be necessary to dismantle the existing arrangements for the association of CO codes and LRNs with exchanges. In addition, the Commission notes that in Decision 2004-46 it determined that CLECs could aggregate their traffic through a single POI for a number of exchanges in an LIR and considers, therefore, that the complexities noted by the Companies should already be incorporated into the LECs' networks.
68. Therefore, the Commission considers that the Part VII process is adequate for dealing with Rogers Wireless's application.

What is the impact on numbering assignment guidelines?

Positions of parties

69. Cogeco requested that the Commission direct, on an expedited basis, that the CSCN make all required adjustments to the Canadian Central Office Code (NXX) Assignment Guidelines to enable all LECs to satisfy their local service obligations by having at least one CO code and one LRN for each LIR, rather than one of each per exchange.

Commission's analysis

70. The Commission notes that if it were to approve Rogers Wireless's proposal, the current requirement in the Canadian Central Office Code (NXX) Assignment Guidelines for LECs to assign an LRN per served ILEC exchange area would need to be amended to permit LECs to select a single LRN per LIR, and to make it optional for LECs to select LRNs at the exchange level.
71. The Commission notes that if LECs wish to assign telephone numbers to customers in exchanges within an LIR, they are required to obtain a CO code for each exchange in which they will be assigning new telephone numbers to customers.

Commission's determinations

72. In light of the above, the Commission determines that the CLEC obligation to obtain a CO code for every served exchange for the purpose of assigning LRNs and call routing is now optional rather than mandatory. It also determines that CLECs must acquire at least a single CO code and assign a single LRN per LIR in which they provide local service, rather than per ILEC exchange.
73. The Commission requests that the CSCN modify the Canadian Central Office Code (NXX) Assignment Guidelines in accordance with the Commission's determinations.
74. The Commission notes that if LECs wish to assign telephone numbers to customers in exchanges within an LIR, they must still obtain a CO code for each exchange in which they will be assigning telephone numbers to their customers. The Commission also notes that, other than the LRN, all numbering-related information for the telephone numbers shall remain the same as that for the CO code of the telephone numbers.

Impact of the Governor in Council's Policy Direction on this application

75. The Commission notes that the Governor in Council's direction in *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives*, dated 14 December 2006 (the Policy Direction), does not apply to this application since the associated record closed within the year before the Policy Direction was issued.
76. However, the Commission believes that its determination to remove the CLEC obligation to obtain a CO code and assign an LRN per exchange for call routing purposes is in keeping with the Policy Direction, as it lessens the degree of regulation for CLECs. The Commission notes

that this change in CLEC obligations will also result in a more efficient use of limited numbering resources. The Commission considers that this change should provide more customers with the benefits of local service competition since a barrier to competitive entry into smaller exchanges has been lessened.

Secretary General

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