



Telecom Decision CRTC 2007-38

Ottawa, 7 June 2007

Code relief for area code 250 – British Columbia

Reference: 8698-C12-200700345

In this Decision, the Commission makes its determinations on a code relief solution for area code 250. In this regard, the Commission directs that

- *the boundary of area code 778 be realigned so that it covers all of British Columbia;*
- *the introduction of mandatory 10-digit local dialing in area code 250 be coordinated with the relief planning activities in Alberta; and*
- *Special Central Office Code Assignment Practices be used to preserve 7-digit local dialing in area code 250 until 10-digit local dialing is introduced.*

Background

1. Area code 250 consists of 273 exchanges located in British Columbia; these exchanges are located in cities and towns on Vancouver Island such as Campbell River, Comox, Duncan, Nanaimo, Parksville, Port Hardy, Saanich, and Victoria, as well as in cities and towns located on the mainland such as Kelowna, Nelson, North and South Kamloops, Penticton, Fort St. John, Prince George, Prince Rupert, Quesnel, and Vernon.
2. Due to growth in these areas, the supply of telephone numbers in area code 250 is running out. The 2004 Numbering Resource Utilization Forecast conducted by the Canadian Numbering Administrator (CNA) indicated that area code 250 would exhaust by May 2009. Since then, the CNA has conducted semi-annual Relief Numbering Resource Utilization Forecasts to monitor the pending exhaust date. The latest Relief Numbering Resource Utilization Forecast, which was conducted in July 2006 and captured the impacts of wireless number portability, indicated that the exhaust date has advanced to January 2008. The results from the January 2007 Numbering Resource Utilization Forecasts, published 27 March 2007, show that area code 250 is still expected to exhaust by January 2008.
3. In *Establishment of a new CISC ad hoc committee for area code relief planning in British Columbia area code 250*, Telecom Public Notice CRTC 2004-4, 7 October 2004 (Public Notice 2004-4), the Commission established a CRTC Interconnection Steering Committee ad hoc relief planning committee (RPC) for the purpose of developing, examining, and making recommendations regarding the various relief options available for area code 250.

4. The RPC filed its Planning Document, dated 26 October 2006, for Commission approval.
5. The Commission issued *Relief planning for numbering plan area 250 in British Columbia*, Telecom Public Notice CRTC 2007-2, 11 January 2007 (Public Notice 2007-2), in which it invited comments on the various options examined and recommendations made by the RPC in its Planning Document.

Process

6. Parties to Public Notice 2004-4 and *Comments solicited for solution to telephone number exhaust in southern British Columbia*, Public Notice CRTC 2000-36, 10 March 2000, were made parties to this proceeding.
7. Northwestel Inc. (Northwestel), Rogers Communications Inc. (RCI), and TELUS Communications Company (TCC) filed submissions dated 8 February 2007. In addition, nine comments were submitted by members of the public.

The RPC's recommendations

8. The RPC evaluated 25 relief options in its Planning Document. The RPC recommended that area code 250 relief be provided by realigning the boundaries of area code 778, which would result in a distributed overlay of area code 778 on area code 250.¹
9. The RPC also recommended that the above relief be implemented in two phases. The RPC recommended that the first phase involve a realignment of the boundaries of area code 778 to include all of British Columbia, with the use of Special Central Office Code Assignment Practices (SCOCAPs). The RPC noted that this would allow Central Office (CO) codes from area code 778 to be assigned within the area covered by area code 250 while maintaining 7-digit local dialing during that phase. The RPC also recommended that, during phase 1, the 200 assignable CO codes available in area code 604 be assigned within the entire territory of area code 604, including the area currently served by area code 778. The RPC recommended that the second phase introduce mandatory 10-digit local dialing in the area served by area code 250 and end the use of SCOCAPs.
10. The RPC indicated that this relief plan would not require further relief measures until 2017, at which time a new area code could be introduced to overlay on all of British Columbia.
11. The RPC also made the following recommendations:
 - i) that mandatory 10-digit local dialing (phase 2) in British Columbia be introduced coincident with the introduction of 10-digit local dialing for area codes 403 and 780 in Alberta.² The RPC submitted that aligning the introduction of 10-digit local dialing in both Alberta and British Columbia would permit the development of a single joint British

¹ Option 2c in the Planning Document.

² Area codes 403 and 780 are both currently undergoing code relief.

Columbia/Alberta customer education and network implementation plan, which would reduce costs and facilitate increased customer awareness;

- ii) that, during the permissive dialing period, those small telecommunications service providers (TSPs) that are not be able to support a recorded announcement with automatic call completion due to network limitations be permitted to use alternative measures³ (rather than routing calls to a brief recorded message before they are completed) to educate subscribers about the pending change to mandatory 10-digit local dialing;
- iii) that the jeopardy condition in area code 250 be revoked 60 days prior to implementation of phase 1 of the relief;
- iv) that the normally unassignable CO codes in area code 250 related to adjacent area codes and future relief area codes remain assignable after the jeopardy condition ends; and
- v) that area code 236 be reserved as the most suitable area code for future relief in British Columbia requiring the introduction of a new area code.

Positions of parties

- 12. Both RCI and TCC supported the RPC's findings and recommendations.
- 13. RCI submitted that it was strongly opposed to geographic splits. RCI submitted that, in addition to the required network changes, geographic splits would require that the handsets of wireless subscribers subject to a new area code be reprogrammed to the new telephone numbers, which would create an additional inconvenience for wireless customers. RCI also submitted that the costs associated with a geographic split were significant.
- 14. TCC considered the recommended relief, which would essentially be a boundary realignment, to be the best approach as it would not require the introduction of a new area code and thus could be implemented quickly. In this regard, TCC noted that area code 778 was an existing area code to which calls were already being routed by all carriers in North America.
- 15. Northwestel noted that, while it had originally requested during the development of the Planning Document by the RPC that its 15 exchanges in northern British Columbia be excluded from the recommended relief, it had reconsidered its position and requested that these exchanges now be included. Northwestel requested that, to the extent that these exchanges were included, three CO codes in area code 250 be set aside for future growth, as 13 of its 15 switches in British Columbia could not provision a new area code.

³ The alternative measures could include, but are not limited to, advertisements in local newspapers, billing insert notifications, information on websites, and letters sent to each affected subscriber.

Northwestel submitted that if these 13 switches were required to provision a new area code, they would have to be replaced at considerable expense. Northwestel indicated that three CO codes would be sufficient to cover expected growth in these exchanges for the next 40 years.

16. Northwestel further requested that the three reserved CO codes not conflict with any of the CO codes already assigned in the adjacent area code 867, as Northwestel's directory assistance system could not handle 10-digit numbers. Northwestel further submitted that granting this request would permit Northwestel to continue to use the current system, since no future relief for area code 867 was expected.
17. Northwestel also noted that its 15 switches in British Columbia could not handle pre-recorded announcements with automatic call completion. Northwestel requested that the permissive dialing period last as long as possible to allow time for its advertising campaign and news releases to reach as many residents as possible.
18. The members of the public who submitted comments opposed the use of area code overlays and 10-digit local dialing, and suggested that various geographic area code splits be used.

Commission's analysis and determinations

19. The Commission considers that the RPC's Planning Document and the comments by interested parties require the Commission to address the following issues:
 - A. The relief method and the timing of its implementation;
 - B. The timing of the end of the jeopardy condition;
 - C. The treatment of unassignable CO codes in area code 250 at the end of the jeopardy condition;
 - D. The inclusion of Northwestel's exchanges in northern British Columbia in the relief measures;
 - E. The use of alternative measures for the consumer awareness program during permissive dialing; and
 - F. The reservation of area code 236 for future relief in British Columbia.

A. The relief method and the timing of its implementation
20. The Commission notes that the main objectives for relief planning activities, as set out in the Commission-approved Canadian NPA Relief Planning Guidelines, are to provide relief that
 - will last for at least an eight-year period;

- does not favour or disadvantage one group of carriers or users over another;
- strikes a reasonable balance between economic, technical, and social impacts of implementation; and
- makes the most effective and efficient use of CO codes serving a given area.

21. The Commission is of the view that since area code 250 is projected to exhaust very soon, the speed and ease of implementing relief must also be considered.
22. The Commission believes that the geographic split relief options are not viable in this instance, as there is insufficient time to introduce a geographic split before area code 250 exhausts. The Commission further considers that a geographic split would add to the complexity of planning future relief measures by increasing the number of relief planning areas. The Commission also agrees with the RPC's assessment that the continuation of 7-digit local dialing in British Columbia would establish precedents that would be difficult to emulate in other parts of Canada.
23. The Commission agrees with the RPC's conclusions that neither a concentrated overlay relief measure nor a distributed overlay solution, which would require a new area code, are viable in this instance, as such solutions would take too long to implement.
24. The Commission considers that since the boundary realignment/overlay options use an existing area code, they have the benefit of being quick to implement. The Commission is of the view that the use of an existing area code will significantly shorten the implementation time frame and reduce the cost of relief implementation.
25. The Commission notes that the relief measure recommended by the RPC is the realignment of the boundary of area code 778 to overlay all of area codes 604 and 250, with CO codes from area code 778 being assigned in the territory served by area code 250. The Commission believes this option will result in reduced customer confusion when area code relief is implemented and when further relief is required. The Commission therefore agrees with the RPC's recommendation for relief to be provided by realigning the boundaries of area code 778 so that it covers all of British Columbia.
26. The Commission notes that the overlay of area code 778 on area code 250 will require the introduction of mandatory 10-digit local dialing in area code 250. The Commission considers, however, that 10-digit local dialing cannot be introduced in the time remaining before area code 250 exhausts, as users and the industry need sufficient time to upgrade, reprogram, and, in some instances, replace their equipment. Accordingly, the Commission agrees that a two-phase implementation approach is necessary in order to provide relief quickly, yet also give the industry sufficient time to prepare for mandatory 10-digit local dialing.

27. The Commission considers that, in order to maintain 7-digit local dialing as proposed by the RPC, when the boundary realignment of area code 778 occurs, it will be necessary to use SCOCAPs for the assignment of CO codes from area code 778 in the territory presently served by area code 250. The Commission considers that the use of SCOCAPs will provide relief quickly, yet will also give the industry sufficient time to prepare for mandatory 10-digit local dialing. The Commission considers that these special assignment procedures must remain in place until mandatory 10-digit local dialing has been implemented.
28. The Commission notes that the first phase of relief also includes the assignment of area code 604 CO codes within the area presently served by area code 778. The Commission considers it appropriate that this measure commence under the first phase of relief, since there is already a large number of area code 604 CO codes in use within the area served by area code 778, and 10-digit local dialing is already in place.
29. The Commission notes that the second phase of relief is the introduction of mandatory 10-digit local dialing across the rest of British Columbia. The Commission agrees that there are significant advantages to coordinating the introduction of mandatory 10-digit local dialing in British Columbia with the introduction of mandatory 10-digit local dialing in Alberta. The Commission agrees that setting a common time frame for both provinces will enable the consumer awareness and network implementation activities to be coordinated under a common plan.
30. The Commission notes that the permissive dialing period for introducing mandatory 10-digit local dialing has traditionally been four months. The Commission also notes that in a final report on the 2006 relief measures in southern Ontario and Quebec, the RPC suggested that a shorter two- to three-month permissive dialing period should be considered in the future. The Commission considers that, with area code 250 exhaust imminent, it is appropriate to use a permissive dialing period of slightly less than three months.
31. The Commission **approves** the area code relief measures proposed by the RPC for area code 250, namely that the boundary of area code 778 be extended to cover all of British Columbia and that the CNA be permitted to assign area code 604 CO codes in the area served by area code 778.
32. The Commission directs that the introduction of mandatory 10-digit local dialing in area code 250 be coordinated with the area code relief measures for Alberta. The Commission instructs the CNA to use SCOCAP measures until mandatory 10-digit local dialing is implemented in the area served by area code 250.
33. With respect to the dates for area code 250 relief, the Commission determines the following:
 - a) The implementation of the boundary realignment for area code 778 and the use of CO codes from area code 604 in the area presently served by area code 778 will commence 4 July 2007;

- b) The introduction of permissive 10-digit local dialing will commence 23 June 2008, and carriers are permitted to phase in this change from that date until 27 June 2008; and
- c) The requirement for mandatory 10-digit local dialing will commence 8 September 2008, and carriers are permitted to phase in this change from that date until 12 September 2008.

B. The timing of the end of the jeopardy condition

- 34. The Commission notes that a jeopardy condition was declared for area code 250 in October 2006 and that a jeopardy condition normally ends on the date that relief is implemented.
- 35. The Commission notes the RPC's recommendation that the jeopardy condition end 60 days prior to area code relief being implemented. The Commission notes that if it implements the RPC's recommendation, new CO codes could be placed into service six days after the relief date. The Commission agrees that, in this instance, with the imminent area code 250 exhaust, anything that can be done to provide relief codes sooner would be of benefit.
- 36. The Commission notes that the first phase of relief implementation will begin within 60 days of the date of this Decision. The Commission therefore considers that the end of the jeopardy condition should be set coincident with the date of this Decision. Accordingly, the Commission determines that the current jeopardy condition for area code 250 ends the date of this Decision.

C. The treatment of unassignable CO codes in area code 250 at the end of the jeopardy condition

- 37. The Commission notes the RPC's recommendation that the normally unassignable area code 250 CO codes that correspond to the projected future and neighbouring Canadian geographic area codes that became assignable in the area code 250 jeopardy condition remain assignable after the end of the jeopardy condition.
- 38. The Commission considers that with the severe exhaust situation that exists in area code 250, it would be beneficial to have the largest pool of assignable CO codes possible for the CNA to select from during the period that the SCOCAPs are in effect.
- 39. The Commission directs that the normally unassignable area code 250 CO codes that correspond to the projected future and neighbouring Canadian geographic area codes remain assignable by the CNA after the end of the area code 250 jeopardy condition.

D. The inclusion of Northwestel's exchanges in northern British Columbia in the relief measures

- 40. The Commission notes Northwestel's submission that its network has some limitations with regard to provisioning more than one area code in some of its switches in northern British Columbia. The Commission further notes that while Northwestel has agreed to

implement 10-digit local dialing, it has asked that three CO codes from area code 250 be set aside for its growth requirements over the next 40 years.

41. The Commission considers that reserving three CO codes from area code 250 will have no impact on the exhaust dates for area codes 250 and 778.
42. The Commission further considers that reserving these CO codes will enable Northwestel to continue to use its current switches well into the future and, as a result, avoid the expense of replacing 13 of its 15 switches in northern British Columbia.
43. Accordingly, the Commission directs the CNA to reserve three CO codes from area code 250 for Northwestel's growth requirements in its northern British Columbia exchanges.

E. The use of alternative measures for the consumer awareness program during permissive dialing

44. The Commission notes that, as part of the consumer awareness program, during the permissive dialing period, local calls dialed using only 7 digits are to be transferred to a recorded announcement noting the impending change to mandatory 10-digit local dialing before these calls are completed.
45. The Commission notes that the network technology of certain TSPs, including small TSPs and Northwestel, is unable to complete a call once it has been forwarded to a recorded announcement. The Commission notes that in order to support such a requirement, upgrades to or replacement of switches would be required. The Commission considers the costs to make these changes to be significant, especially considering that this functionality would only be required for two to three months during the permissive dialing period.
46. The Commission notes RPC's recommendation that the Commission allow small TSPs in British Columbia that have these types of network limitations to use alternative customer education methods.
47. In *Relief implementation plans for area codes 450, 514, 519, 613 and 819*, Telecom Decision CRTC 2006-26, 11 May 2006 (Decision 2006-26), the Commission found that a number of small TSPs in Ontario and Quebec could not economically support the network modifications required to provide automatic call completion with recorded announcement during the permissive dialing period before the beginning of mandatory 10-digit local dialing. In that Decision, the Commission permitted these TSPs to use alternative measures (other than a recorded announcement) during the permissive dialing period to educate their customers about the change to 10-digit local dialing. The Commission notes that the alternative measures included sending monthly bill inserts, placing notices in local newspapers, sending personal letters to each customer, and placing information on the TSPs' websites in a highly prominent location.
48. The Commission considers it appropriate for the TSPs in British Columbia that have network limitations that prevent them from providing automatic call completion with recorded announcement, including small TSPs and Northwestel, to use alternative customer education measures, similar to those approved in Decision 2006-26, to inform

their customers in British Columbia of the change to 10-digit local dialing. Accordingly, the Commission directs those small TSPs in British Columbia that cannot complete calls after a recorded announcement to take the following measures during the permissive dialing period for area code 250:

- a) monthly bill inserts are to be sent to all affected customers during July 2008 and August 2008;
- b) two notices are to be placed in local newspapers, one during August 2008 and the other during September 2008, before the beginning of mandatory 10-digit local dialing;
- c) each affected customer is to be sent a personal letter, to be received 10 days prior to the beginning of mandatory 10-digit local dialing;
- d) information is to be placed on the TSP's website in a prominent, highly visible location for the minimum period of July 2008 to the end of September 2008 inclusive; and
- e) the text to be included in the bill inserts and personal letters is to be filed with the Commission at least 30 days prior to the inserts or letters being sent.

F. The reservation of area code 236 for future relief in British Columbia

49. The Commission notes the RPC's request that area code 236 be reserved for future assignment in British Columbia.
50. The Commission further notes that, as noted by the RPC, area code 236 is the only area code in the list of projected future Canadian Geographic Numbering Plan Areas that has not already been assigned as a CO code in area codes 250, 604, and 778.
51. The Commission considers it good assignment practice to use an area code that has not been used as a CO code within the area served or in adjacent areas, as this reduces customer dialing confusion. The Commission therefore considers it appropriate to reserve area code 236 for future area code relief in British Columbia.
52. The Commission directs the CNA to reserve area code 236 for future area code relief in British Columbia. The Commission also directs that area code 236 not be assigned as a CO code in area code 250, 604, or 778.

Secretary General

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