



Telecom Decision CRTC 2020-379

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CISC Canadian Steering Committee on Numbering – Consensus reports CNRE129A and CNRE130A regarding updates to the Canadian NPA Relief Planning Guideline

*The Commission **approves** consensus reports CNRE129A and CNRE130A and expects that the Canadian NPA Relief Planning Guideline will be updated in accordance with the recommendations in the reports.*

Background

1. On 27 July 2020, the Canadian Steering Committee on Numbering (CSCN) of the CRTC Interconnection Steering Committee (CISC) submitted the following Task Information Form (TIF) consensus reports for Commission approval:
 - *Revised Appendix E, Relief Implementation Plan Template, and revised Appendix I, Proposal for Relief of an Overlay NPA [Numbering Plan Area] Complex Template, to the Canadian NPA Relief Planning Guideline, 3 July 2020 (CNRE129A); and*
 - *New Appendix J, Expedited Process for Deferral of Relief, to the Canadian NPA Relief Planning Guideline, 3 July 2020 (CNRE130A).*
2. Both reports address changes to the Canadian NPA Relief Planning Guideline (the Guideline). CNRE129A is for an update to the templates for the Proposal for Relief of an Overlay NPA Complex and the Relief Implementation Plan, which are appendices in the Guideline. CNRE130A is for the development of a new process for a quick response to defer or cancel relief implementation when there is a significant delay in the projected exhaust date of an area code.
3. The reports can be found in the “Reports” section of the CSCN page, which is available in the CISC section of the Commission’s website at www.crtc.gc.ca.
4. When the projected exhaust date for an area code has entered the window to begin area code relief planning for the addition of a new area code, the Commission issues a notice of consultation announcing that an area code is in need of relief. At that time, the Commission also establishes a relief planning committee to analyze how area code relief should be provided, to develop a relief implementation plan, and to make recommendations on these matters to the Commission for its approval. These activities are guided by the Guideline.

5. In June 2019, the CSCN initiated a TIF entitled *Review of the relief planning and number forecast processes associated with Relief of an Overlay NPA Complex* (CNTF105B) to review the relief planning and number forecasting processes associated with overlay area code complex¹ relief. The TIF includes four objectives:
 - a. eliminate the requirement to conduct numbering resource utilization forecasts at the exchange area level;
 - b. shorten the timeline for relief planning and implementation;
 - c. develop a process for a quick turnaround for postponement of relief implementation when a projected exhaust date is significantly deferred; and
 - d. standardize planning and implementation documentation.
6. CNRE129A and CNRE130A include recommendations for objectives c and d in the paragraph above. The CSCN continues to work on the objectives in CNTF105B and will be submitting additional TIF reports, as appropriate, for objectives a and b.

CNRE129A

7. In CNRE129A, the CSCN addresses objective d in CNTF105B. It notes that most of the text in the area code relief planning and implementation documentation is boilerplate text. It relates to general area code relief planning processes and implementation, and each relief planning committee reviews and modifies the text every time it is submitted for new area code relief. The CSCN indicated in the TIF report that the process could be much more efficient if a relief planning committee were to focus solely on the specific area code information² that changes rather than the standardized text.
8. The Proposal for Relief of an Overlay NPA Complex is approximately 40 pages long with text taken from the Guideline as well as various maps, charts, and tables that were useful when alternative relief methods other than overlay area codes needed to be considered.
9. The Relief Implementation Plan is approximately 20 pages long and contains a significant amount of text that is the same for every area code relief. That text does not need to be reviewed or modified for each new area code relief.
10. For each of these documents, the CSCN developed templates with sections that have locked text that does not change, standard form fields to input specific area code

¹ An overlay area code complex is where there is more than one area code serving the same geographic area. An example would be 343/613 in eastern Ontario.

² This information would be the area code to be used, the date a new area code is activated, and any specific requirements unique to area code relief.

information, and an open section for rationale and information that is specific to the exhausting area code(s).

11. In CNRE129A, the CSCN recommended that the Commission

- approve the CSCN's Proposal for Relief of an Overlay NPA Complex and add it to the Guideline as an appendix in place of the current version of this appendix; and
- approve the CSCN's proposed template for the Relief Implementation Plan and add it to the Guideline as an appendix in place of the current version of this appendix.

Commission's analysis and determinations

12. Over time, area code relief has converged³ on using distributed overlay area codes, given that they are less complicated to implement, present less of an administrative burden,⁴ and have a minimal impact on customers because they can retain their current local telephone numbers.⁵

13. The use of distributed overlay area codes has significantly reduced the work of relief planning committees because only three distributed overlay options need to be considered. Once those options are considered, only a few common elements need to be decided, such as the area code to be used and the timing for implementing the new area code.

14. Therefore, the Commission considers that the use of standardized template documents would streamline the work of relief planning committees, resulting in increased efficiency in planning future area code relief.

CNRE130A

15. In CNRE130A, the CSCN addresses objective c in CNTF105B. The CSCN recommends a standardized process for a more efficient postponement of relief implementation when the projected exhaust date of an area code is significantly deferred when relief planning and implementation is underway. The CSCN submitted that a standardized approach would be an improvement compared to the current

³ To date, 29 additional area codes have been implemented from the original 16 area codes assigned to Canada.

⁴ Unlike area code splits or concentrated overlay area codes, distributed overlay area codes do not create new areas for which future area code relief would have to be considered.

⁵ When the first overlay area code is added, local telephone numbers change from 7 digits to 10 digits as the area code becomes part of the telephone number. However, the local 7-digit portion of the telephone number remains unchanged. Customers' telephone numbers are unaffected when additional overlay area codes are added.

process, in which the Canadian Numbering Administrator (CNA)⁶ and a relief planning committee spend considerable time negotiating a relief deferral or cancellation.

16. The rationale for a standardized approach is the frequent volatility in recent projected exhaust dates. There has always been some volatility in projected exhaust dates; however, in recent years, they have fluctuated significantly, with some area codes seeing fluctuations of 36 months or more. These projected exhaust date fluctuations are disruptive to the telecommunications industry. They cause significant uncertainty as to whether relief implementation tasks can be completed on time, especially if the Commission were not to amend relief implementation dates, or if it becomes premature to expend resources for relief implementation that may not be needed for a few years.
17. The Guideline does allow for projected exhaust date advances or delays if there are significant changes in a projected exhaust date (i.e. six months or more), wherein a relief planning committee can, via the CISC process,⁷ request that the Commission modify the relief implementation date. The Guideline also includes a process for the suspension of relief planning. However, it is only applicable within the relief planning timeframe of 72 months, and there is no specific process to facilitate the suspension of relief implementation once the Commission has approved a relief date by means of a Commission decision.
18. The ability to react more quickly would be beneficial, given that the current industry process and approval timeframes are not always fast enough to respond to projected exhaust date fluctuations. It is important that relief implementation dates are not years in advance of projected exhaust dates, given that implementing new area codes is a significant undertaking for some carriers and customers who must update their telecommunications equipment to accept new or multiple area codes.
19. In CNRE130A, the CSCN proposed the adoption of a standardized expedited process that would be applied when a projected exhaust date is significantly deferred for an overlay area code complex. When it is determined that relief is not immediately required, the process would provide the CNA and Commission staff with the ability to trigger a process that would lead to a recommendation for relief deferral or cancellation to be approved by the Commission.
20. In this TIF report, the CSCN recommended that
 - the Commission approve the addition of the new Appendix J – Expedited Process for Deferral of Relief to the Guideline;

⁶ The CNA is the administrator of numbering resources in Canada.

⁷ The CISC process includes the initiation of a TIF to define the work item and then the production of a TIF report with recommendations for CISC and Commission approval.

- objective c of CNTF105B remain open to allow for potential solutions to further streamline and/or accelerate the approval process for postponement of relief implementation; and
- the following paragraph be inserted into the Guideline:

4.15 If Relief Planning has been started for an Overlay NPA Complex and the PED moves out significantly, then the CNA shall initiate the Expedited Process for Deferral of Relief (see Appendix J).

Commission's analysis and determinations

21. The projected exhaust dates for area codes are driven by carriers' forecasts of their future central office (CO) code requirements, which can change due to changes in customer demand, revised marketing plans, or the introduction of new products or services. Those changes can impact the projected exhaust dates of area codes, resulting in projected exhaust date volatility. The degree of volatility will increase as area codes near exhaustion, given that (i) the pool of available CO codes is continuously shrinking, and that (ii) changes in CO code requirements will have an increasingly large impact due to the smaller pool of available CO codes. As a result, there will always be volatility in the projected exhaust dates of area codes, and it is reasonable for the CSCN and relief planning committees to take measures to quickly and efficiently respond to these changing conditions.
22. Therefore, the Commission considers that the use of a standardized expedited process would be efficient in streamlining industry deliberations on rapidly changing requirements for area code relief.

Conclusion

23. In light of all the above, the Commission **approves** consensus reports CNRE129A and CNRE130A and expects that the Guideline will be updated in accordance with the recommendations in the reports.

Policy Directions

24. In accordance with subparagraph 1(b)(i) of the 2006 Policy Direction,⁸ the Commission considers that approval of the TIF reports will advance the policy objectives set out in paragraphs 7(a) and (f) of the *Telecommunications Act*.⁹

⁸ *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives*, SOR/2006-355, 14 December 2006

⁹ The cited policy objectives are 7(a) to facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions; and 7(f) to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation, where required, is efficient and effective.

25. In accordance with the 2019 Policy Direction,¹⁰ the Commission considers that this decision can promote competition, affordability, and consumer interests by providing streamlined processes related to the administration and use of Canadian numbering resources.

Secretary General

¹⁰ *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation*, SOR/2019-227, 17 June 2019