



## Telecom Decision CRTC 2023-88

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Reference: Part 1 application posted on 25 November 2022

Ottawa, 22 March 2023

*Public record: 8698-T8-202209618*

### **TBayTel – Application for a modified implementation timeline for ten-digit local dialing**

#### **Summary**

The Commission **approves** TBayTel's Part 1 application in which the company requested that it be allowed to implement permissive seven- and ten-digit local dialing for its wireline customers on 15 November 2023 and to fully transition to restrictive ten-digit local dialing on 15 January 2024.

#### **Background**

1. In *Introduction of 9-8-8 as the three-digit abbreviated dialing code for mental health crisis and suicide prevention services and Northwestel Inc.'s application for modified implementation of ten-digit local dialing*, Telecom Regulatory Policy CRTC 2022-234, 31 August 2022 (the Regulatory Policy), the Commission issued its determinations regarding the introduction of a three-digit abbreviated dialing code for mental health crisis and suicide prevention services (the three-digit code). In the Regulatory Policy, the Commission determined, among other things, that 9-8-8 is to be introduced as the three-digit code.
2. However, because 9-8-8 has been used as a central office code (i.e., the first three digits of a seven-digit telephone number) in certain areas in Canada, its use as a three-digit code requires the implementation of ten-digit local dialing in these areas. Generally, in areas where seven-digit local dialing is in place, once a central office code is dialed, switches are programmed to receive an additional four digits. Calls dialed with fewer than seven digits will therefore not complete. Seven-digit local dialing is still the norm in certain numbering plan areas (NPAs) in Canada (i.e., Yukon, Northwest Territories and Nunavut [NPA 867], Northern Ontario [NPA 807], New Brunswick [NPA 506], and Newfoundland and Labrador [NPA 709]). For this reason, in the Regulatory Policy, the Commission directed telecommunications service providers (TSPs) to transition to ten-digit local dialing by 31 May 2023, with

two exceptions. These exceptions apply to Northwestel Inc. (Northwestel)<sup>1</sup> outside the Yellowknife local interconnection region and to TSPs providing services in NPA 506 in New Brunswick, which is already in the process of transitioning to ten-digit local dialing. A new NPA code will be introduced in New Brunswick by 23 April 2023.

## Application

3. On 25 November 2022, the Commission received a Part 1 application from TBayTel, in which the company requested that the Commission approve a modified implementation timeline for ten-digit local dialing for the company. TBayTel requested to be permitted to implement permissive seven- and ten-digit local dialing<sup>2</sup> for its wireline customers on 15 November 2023 and to fully transition to restrictive ten-digit local dialing on 15 January 2024. TBayTel indicated that its request would not jeopardize its ability to launch 9-8-8 for both its wireline and wireless customers at the time required by the Commission, since 9-8-8 is not used as a central office code in NPA 807, where the company provides its services.
4. TBayTel submitted that certain factors are impacting its ability to meet the timelines established by the Commission for the transition to ten-digit local dialing.
5. TBayTel indicated that it is currently modernizing its communication network, and that it has to rely on its outside vendor for the overall completion of its transition to ten-digit local dialing. It added that key internal personnel and subject matter experts are also assigned to this task and to its network modernization. Its resources are therefore limited.
6. TBayTel also submitted that the transition from seven- to ten-digit local dialing is impacting some of its customers. These customers need time to make changes to their premise equipment, such as private branch exchange systems, monitoring equipment, and telephone number databases. In addition to equipment that customers must reprogram on their own, TBayTel submitted that there is a large segment of customers whose equipment must be reprogrammed by the company, either remotely or by an on-site technician, and that the scope of effort required to complete this reprogramming exceeds what is feasible by the company within the timeframe provided by the Commission. TBayTel added that it is fully prepared to undertake the

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<sup>1</sup> As part of the Regulatory Policy, the Commission also approved a Part 1 application from Northwestel, in which the company requested that the Commission approve the implementation of mandatory ten-digit local dialing in the Yellowknife local interconnection region (LIR) only, while the remainder of the 867 NPA would allow for calls to be dialed using both seven and ten digits. Northwestel argued that the implementation of ten-digit dialing in the Yellowknife LIR was necessary because 9-8-8 is in use as a central office code in that LIR.

<sup>2</sup> The transition to ten-digit local dialing includes a phase in which both seven- and ten-digit local dialing is provided on a permissive basis (i.e., customers can dial a local number using either seven or ten digits) to educate telecommunications users about dialing local calls using ten digits. Education is provided, for example, through network announcements provided to callers dialing a seven-digit number to inform them about the transition. In the final phase, ten-digit local dialing becomes mandatory.

necessary communications activities to ensure that customers are notified and educated about the transition, and to modify its communications plan accordingly.

7. In addition, TBayTel submitted that its proposed modified timeline for ten-digit local dialing would not impact other TSPs, since it is prioritizing intercarrier-related activities in its implementation plan. These activities were expected to be completed by 3 March 2023, well in advance of the introduction of the permissive seven- and ten-digit dialing period scheduled for 31 May 2023.
8. The Commission did not receive any interventions in response to TBayTel's Part 1 application. The record of this proceeding closed on 16 December 2022.

### **Commission's analysis**

9. The Commission notes that the transition to ten-digit local dialing was mandated to enable the introduction of 9-8-8. However, approval of TBayTel's revised implementation timeline for the transition to ten-digit local dialing will not have any impact on the company's ability to launch 9-8-8 on 30 November 2023, as is required by the Commission. TBayTel's revised implementation timeline would also provide more time to customers and TBayTel, a small incumbent local exchange carrier, to reprogram their equipment and perform any necessary work on that equipment in preparation for the transition to ten-digit local dialing.
10. TBayTel's proposed modified timelines for the transition to ten-digit local dialing would not impact other TSPs, since the company would have completed any necessary work that could impact other TSPs before the deadline provided for them to transition to ten-digit local dialing. Furthermore, TBayTel is prepared to inform its subscribers about the transition and to modify its communications plan accordingly.
11. In addition, given that the transition to ten-digit local dialing will have no impact on TBayTel's ability to launch 9-8-8 by the deadline set by the Commission, and in light of the important modernization work that the company is currently undertaking, the Commission considers that it would be appropriate to provide TBayTel with additional administrative flexibility to address any other unforeseen delays in the transition to ten-digit local dialing that could occur in the future. Accordingly, TBayTel can file a letter, instead of a Part 1 application, informing the Commission of any other modification to its ten-digit local dialing implementation timelines, with appropriate rationale, if the company needs to further modify these timelines.

### **Conclusion**

12. In light of all of the above, and given that TBayTel's request would allow the company to implement 9-8-8 in the same timeframe as it will be implemented in other areas of Canada with little impact on customers, the Commission **approves** TBayTel's Part 1 application in which the company requested that it be allowed to implement permissive seven- and ten-digit local dialing for its wireline customers on 15 November 2023, and to fully transition to restrictive ten-digit local dialing on 15 January 2024.

Secretary General