



Telecom Decision CRTC 2024-239

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Reference: Part 1 application posted on 23 May 2024

Ottawa, 10 October 2024

Public record: 8698-B2-202402874

Application to review and vary Telecom Regulatory Policy 2024-26 regarding thousand-block pooling

Summary

Telephone numbers are a finite resource and a key building block at the heart of our modern communications system. Due to the emergence of many new services in recent years (such as Voice over Internet Protocol [VoIP] and Internet of Things applications), and the continued increase in cellphone use, more numbers are needed to serve Canadians.

In Telecom Regulatory Policy 2024-26 (the Policy), the Commission directed local exchange carriers and wireless service providers to implement thousand-block pooling by 6 October 2025 as a way to conserve telephone numbers and to help delay the possibility that telephone numbers could exhaust before 2030. The Commission also requested that the CRTC Interconnection Steering Committee examine how it could reallocate unused telephone numbers.

Bell Canada; Cogeco Communications inc., on behalf of Cogeco Connexion Inc.; the Independent Telecommunications Providers Association; Quebecor Media Inc.; Saskatchewan Telecommunications; TELUS Communications Inc.; and Westman Media Cooperative Ltd. (collectively, the Applicants) filed an application requesting that the Commission review and vary several elements of the Policy. They claimed that the Commission failed to consider the complexity of the technical and operational changes needed to meet the implementation deadline.

The Commission finds that the Applicants did not establish substantial doubt that the Commission had committed an error in fact and that it had failed to consider a basic

principle in the proceeding that led to the Policy. Accordingly, the Commission denies the review and vary application.

Through this decision, the Commission continues to ensure that Canada's remaining inventory of telephone numbers is managed responsibly to the benefit of all Canadians who rely on telecommunications as an essential aspect of their everyday lives.

Background

1. On 5 February 2024, the Commission issued Telecom Regulatory Policy 2024-26 (the Policy), which was the result of a proceeding initiated by Telecom Notice of Consultation 2023-92 (the Notice). In the Policy, the Commission directed local exchange carriers (LECs) and wireless service providers (WSPs) to implement thousand-block pooling (TBP) by 6 October 2025. The Policy included several other measures aimed at shifting the industry's focus towards telephone number preservation.
2. Once implemented, TBP will allow for the assignment of telephone numbers to telecommunications service providers (TSPs) in blocks of 1,000 numbers. Currently, when extending service to a new area, TSPs are automatically assigned blocks of 10,000 numbers, regardless of the population in the area. This can lead to many assigned numbers remaining unused.
3. In the Policy, the Commission also requested that the CRTC Interconnection Steering Committee (CISC) examine how unused numbers from previously assigned central office (CO) codes¹ could be included in the number inventory and that it file a report by 6 August 2024.

Application

4. The Commission received an application from Bell Canada; Cogeco Communications inc., on behalf of Cogeco Connexion Inc.; the Independent Telecommunications Providers Association; Quebecor Media Inc.; Saskatchewan Telecommunications; TELUS Communications Inc.; and Westman Media Cooperative Ltd. (collectively, the Applicants), dated 6 May 2024, requesting that the Commission review and vary several elements of the Policy. They alleged that the Commission committed an error in fact and failed to consider a basic principle in the proceeding that led to the Policy.
5. Specifically, the Applicants submitted that the Commission failed to consider the standards and processes that the industry must put in place for the implementation of TBP, as well as the time required to develop them and then to implement TBP. Based on this alleged error, the Applicants requested that the Commission take the following actions:

¹ CO (or NXX) code refers to the second group of three digits of a ten-digit telephone number.

- amend the deadline by which CISC was requested to file its report from 6 August 2024 to 30 September 2024;
 - request that CISC file, by 30 September 2024, an additional report with the Commission providing a plan for implementation of TBP; and
 - suspend the implementation date of TBP.
6. The Commission received interventions regarding the application from the Competitive Network Operators of Canada (CNOOC) and TekSavvy Solutions Inc. (TekSavvy).

Review and vary criteria

7. In Telecom Information Bulletin 2011-214, the Commission outlined the criteria it would use to assess review and vary applications filed pursuant to section 62 of the *Telecommunications Act*. Specifically, the Commission stated that applicants must demonstrate that there is substantial doubt as to the correctness of the original decision, for example due to (i) an error in law or in fact, (ii) a fundamental change in circumstances or facts since the decision, (iii) a failure to consider a basic principle which had been raised in the original proceeding, or (iv) a new principle which has arisen as a result of the decision.

Issue

8. The Commission has identified the following issue to be addressed in this decision:
- Did the Commission commit an error in fact and fail to consider a basic principle in the Policy, and if so, should it grant the Applicants' requested relief?

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Position of Applicants

9. The Applicants were in favour of better management of numbers and acknowledged they would benefit the most from the requested relief. However, they argued that the Commission made an error in fact by assuming that industry stakeholders would already possess the knowledge and resources necessary to implement TBP. The Applicants also argued that the Commission failed to consider a basic principle that had been raised in the original proceeding that led to the Policy. Specifically, they argued that standards and processes must be developed by the industry for the implementation of TBP, and an appropriate period is required to implement TBP effectively because these standards and processes have not yet been developed.
10. The Applicants indicated that in response to the Notice, most stakeholders submitted that a minimum of 24 months was necessary to implement TBP. They also indicated that the Policy did not expressly require CISC to establish the criteria that stakeholders, namely the Canadian Numbering Administrator (CNA), the Number

Portability Administration Center, and TSPs must adhere to for the implementation of TBP in Canada. The Applicants also remarked that TBP guidelines and processes in the United States could not simply be copied for the Canadian landscape.

11. The Applicants argued that there are technical and operational challenges and that there must be a clear understanding across the industry to guide stakeholders' development of plans to update their information technology systems, networks, and processes.
12. The Applicants noted that the exact role and responsibilities of the TBP administrator remain undefined in Canada. They suggested that the Canadian Numbering Administration Consortium Inc. (CNAC), in collaboration with other stakeholders through CISC, create a set of requirements to define how numbers will be administered. The Applicants argued that under normal circumstances, CISC would be tasked with submitting a report to the Commission for review and approval of the standards and processes before the CNA starts implementing any new system.
13. The Applicants put forth that, in addition to the report on returning unused numbers, CISC should also file a report containing a plan with standards and processes for TBP implementation, since both matters are interdependent. The Applicants submitted that the deadline for both reports should be 30 September 2024.

Positions of Parties

14. CNOC supported the application and agreed that standards and processes must first be agreed upon in order to implement TBP. CNOC also supported the idea that the industry needs to develop guidelines and should establish a roll-out schedule instead of rushing TBP implementation.
15. TekSavvy recognized that the implementation of TBP is a complex task that requires considerable work; however, it disagreed with the Applicants that the TBP reporting and implementation timelines should be extended or suspended. TekSavvy was concerned that granting the delay requested in the application would push back the implementation of TBP to 2027 at the earliest. TekSavvy asked the Commission to quickly reaffirm its findings so that the CISC Canadian Steering Committee on Numbering (CSCN) could focus on the work that is required to implement TBP.

Commission's analysis

16. In paragraph 14 of the Policy, the Commission acknowledged submissions from interveners in which they stated that significant changes to the industry's systems and processes would be required to implement TBP. The Policy directed LECs to make the required changes in their equipment and systems and to work together, and with their vendors and relevant entities involved in numbering administration, to implement TBP in accordance with the Policy. The Commission also recognized the urgency of the situation and noted that the industry could draw on processes in place in the United States.

17. The Commission considers that the Policy did take into account the issues raised by the Applicants. In paragraph 21 of the Policy, the Commission acknowledged the need to develop standards and processes when it stated that TBP implementation would be a complex project. As such, the Commission directed Canadian carriers, CISC, the CNA, and Neustar (as the number portability administrator) to work together to ensure the required system, infrastructure, and process changes are in place for TBP.
18. Furthermore, the Commission noted that CNAC was to make the required changes to its service agreement with the CNA to include the additional TBP administration duties. Therefore, the Commission considers that if the industry or CISC determines that additional administration duties are to be assumed by the CNA, CNAC would have already been directed to make the required changes in its service agreement with the CNA.
19. Accordingly, the Commission determines that there was no error in fact. The Commission made its determinations appropriately considering all interventions and the relevant principles and factors. The urgency of the matter justified the approach it took. When directing CISC to facilitate the implementation of TBP, the Commission made it clear that it expected the industry to lead and work together with CISC towards establishing the standards (including interoperability), processes, and any guidelines required to implement TBP.
20. The Commission notes that the two initiatives described in the application – the implementation of TBP and the development of a process for returning unused numbers – while interconnected, were purposely separated into two projects to avoid delaying the implementation of TBP.
21. The Commission also notes that the Policy does not prohibit CISC from submitting thousand-block and CO code assignment guidelines to the Commission for approval. However, the Commission considers that any new guidelines or changes to existing guidelines relevant to TBP must be submitted for approval prior to the TBP implementation deadline.
22. With respect to the report on the inclusion of unused numbers from previous assignments, it is always open to the CSCN to request an extension for filing a specific report if needed. If that is the case, it is not necessary to review and vary the Policy.

Conclusion

23. In light of the above, the Commission considers that the Applicants did not establish substantial doubt that it had committed an error in fact or that it had failed to consider a basic principle in the proceeding that led to the Policy. Therefore, the Commission finds that extending the TBP implementation deadline is not warranted. Accordingly, the Commission denies the application to review and vary the Policy.

Secretary General

Related documents

- *Implementing thousand-block pooling*, Telecom Regulatory Policy CRTC 2024-26, 5 February 2024
- *Call for comments – Implementing thousand-block pooling*, Telecom Notice of Consultation CRTC 2023-92, 23 March 2023; as amended by Telecom Notices of Consultation CRTC 2023-92-1, 23 March 2023; and 2023-92-2, 18 April 2023
- *Revised guidelines for review and vary applications*, Telecom Information Bulletin CRTC 2011-214, 25 March 2011