Telecom Decision CRTC 2026-211

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Application by Ztar Mobile Canada, Inc. for access to Rogers Communications Canada Inc.'s telephone number porting system

Summary

The Canadian Radio-television and Telecommunications Commission (the Commission) is working to increase choice and affordability of cellphone services by promoting greater competition between service providers while ensuring continued investments in high-quality networks.

Ztar Mobile Canada, Inc. (Ztar) has sold cellphone services to Canadians since 2004 under several brands, including Good2Go Mobile, SpeakOut Wireless, and Ztar Mobile. Rather than operating its own network, Ztar has historically resold services by accessing Rogers Communications Canada Inc.'s (Rogers) network. Ztar obtained this access through commercial negotiations with Rogers.

In late 2024, Rogers informed Ztar that it would not be renewing their resale agreement, meaning that Ztar would no longer have access to Rogers' network following expiry of their current contract. Rogers initially provided Ztar with notice six months before termination and set a disconnection date of 4 June 2025. The day before that deadline, Ztar filed an application with the Commission seeking interim relief to temporarily extend the disconnection deadline, as well as other final relief.

Before the Commission could address Ztar's request for interim relief, Rogers and Ztar reached an agreement under which Rogers extended its disconnection deadline to 11 December 2025. This extension was intended to give Ztar more time to transition its customers to another underlying wholesale provider. Rogers ceased providing services to Ztar on that date.

Approximately a week later, on 19 December 2025, Ztar filed a subsequent application seeking access to one of Rogers' information systems that would allow Ztar to process future requests to port its disconnected customers' telephone numbers. Rogers provided this access to Ztar until 22 January 2026. Then, on 27 January 2026, Ztar filed an application with the Commission seeking an order to re-establish its access to Rogers' system until it could process all customer porting requests. This decision focuses on Ztar's request to re-establish access to Rogers' porting information system.

The Commission held a public proceeding on Ztar's application. In response, the Commission received interventions from Every-Day Computers Inc., Iristel Inc., and an individual. In order to ensure a complete record, the Commission also issued requests for information to Ztar and the Commission for Complaints for Telecom-television Services Inc. (CCTS).

Based on the record of this proceeding, the Commission denies the request on the grounds that Rogers fulfilled its contractual obligations to Ztar, provided sufficient notice to Ztar of the impending disconnection, and acted in accordance with the Commission's policies on number porting.

To minimize any impact on Canadians, the Commission directs Ztar to clearly inform its customers about alternative ways to obtain cellphone services. Ztar must also inform its customers that the CCTS is available to address individual complaints should a customer experience problems with their service.

A dissenting opinion by Commissioner Bram Abramson is attached to this decision.

Background

1. Ztar Mobile Canada, Inc. (Ztar) previously used Rogers Communications Canada Inc.'s (Rogers) cellphone network to operate as a reseller under Ztar Mobile, Good2Go Mobile, and SpeakOut Wireless brands.

2. Ztar's present application follows the termination of Ztar's reseller agreement with Rogers in December 2024. At that time, Rogers informed Ztar that it would disconnect it from its network after 4 June 2025. Rogers explained that this was because Ztar had outstanding amounts owed to Rogers, and Rogers was seeking to phase out its 3G network to eventually shut it down. Ztar's services relied on Rogers' 3G network.

3. In response to the disconnection notice, Ztar filed an initial application with the Canadian Telecommunications and Radio-television Commission (the Commission) requesting interim and final relief. Before the Commission issued a decision on that application, Ztar and Rogers reached an agreement that allowed Ztar to continue receiving services from Rogers. During this period, Ztar had the opportunity to transfer its service and clients to another provider.

4. In November 2025, Rogers issued a new disconnection notice to Ztar and ceased providing services to Ztar on 11 December 2025. On 19 December 2025, the Commission received a letter from Ztar, requesting that the Commission direct Rogers to restore Ztar's access to Rogers' wireless activation management (WAM) system. Rogers granted Ztar temporary access until 22 January 2026, which enabled Ztar to address requests from its customers to port their telephone numbers to alternative providers, until that date.

Application

5. The Commission received an application from Ztar, dated 27 January 2026, requesting an interim order to direct Rogers to restore normal unrestricted access to its WAM system. This would allow Ztar to review and assist with customer porting requests. Ztar submitted the application after Rogers' commitment to provide temporary access to its WAM system expired on 22 January 2026.

6. On 30 January 2026, Commission staff advised parties of expedited timelines to address Ztar's application. The Commission received Rogers' answer by the 16 February 2026 deadline. Under the expedited timelines, reply comments were to be submitted by 23 February 2026. Ztar filed its reply comments on 3 March 2026.

7. Ztar did not file a distinct application seeking final relief. Instead, in its reply, Ztar stated that its request for interim relief amounts to a request for final relief, because it is ultimately seeking access to Rogers' WAM system for the amount of time that it would need to process all customer porting requests, after which no further relief would be necessary.

8. On 11 March 2026, Rogers submitted a procedural request stating that Ztar's reply was submitted past the deadline, that Ztar introduced issues that were not raised in its 27 January 2026 application, and that many of the details presented in Ztar's reply were incorrect. For these reasons, Rogers submitted that Ztar's reply should not form part of the public record. Rogers requested that, alternatively, the Commission add the substantive comments from Rogers' procedural request to the record.

9. On 13 March 2026, Commission staff sent a letter to Ztar allowing it to submit a final reply to Rogers' procedural request. Ztar filed its final reply, restating that Rogers' actions in blocking customer porting requests have created a significant burden on customers and on Ztar.

10. Every-Day Computers Inc. (Every-Day Computers), Iristel Inc. (Iristel), and an individual filed interventions in support of Ztar's application.

Issues

11. The Commission has identified the following issues to be addressed in this decision:

    - Should the Commission accept Ztar's late reply and Rogers' additional comments?
    - Should the Commission grant Ztar's requested relief?

Should the Commission accept Ztar's late reply and Rogers' additional comments?

12. The Commission is of the view that accepting Ztar's late reply, Rogers' subsequent response, and Ztar's final reply allows for a more complete record while ensuring procedural fairness for all

parties. The Commission therefore accepts Ztar's 3 March 2026 reply, Rogers' substantive comments in its procedural request, and the final reply submitted by Ztar as part of the record of this proceeding.

Should the Commission grant Ztar's requested relief?

Preliminary matter

13. Ztar did not file a distinct application seeking final relief. Instead, at the reply phase of its application for interim relief, Ztar indicated that its request for interim relief amounts to a request for final relief, because it is ultimately seeking access to Rogers' WAM system for the amount of time that it would need to process all customer porting requests, after which no further relief would be necessary.

14. The Commission considers that, regardless of whether the request is framed as a request for interim or final relief, the primary issue is Ztar's request for access to Rogers' WAM system to port disconnected customer telephone numbers despite no longer receiving services from Rogers or having access to Rogers' network. Therefore, the Commission has evaluated whether granting relief in the form of continued access is appropriate based on the information available in Ztar's application and the record of the proceeding. In its evaluation, the Commission has taken the following into consideration:

    - Rogers' obligations regarding notice and porting;
    - the impact of granting relief on customers; and
    - the impact of granting relief on the Canadian telecommunications market.

Positions of parties

Rogers' obligations regarding notice and porting

15. Ztar indicated that the relief it requested would pose little inconvenience to Rogers. In order to meet wireless number portability requirements, Rogers would have to restore Ztar's access to its system to process porting requests from existing Ztar customers.

16. Ztar indicated that it began notifying its customers of the termination of the service that it offered over Rogers' 3G network in July 2025 and continued to provide notifications by multiple means of communication to provide its customers the necessary time to transfer their service and telephone numbers. It added that, ultimately, individual customers are responsible for initiating the porting process.

17. In its answer, dated 16 February 2026, Rogers stated that its 3G network was shut down on 11 December 2025. It added that the shutdown had been scheduled and communicated to customers more than a year in advance, independent of the services it provided to Ztar. Rogers

stated that it has always complied with its regulatory and contractual obligations, including its porting obligations.

18. Rogers indicated that, under the Commission's wireless number portability requirements and as per Telecom Decision 2006-28, it is required to port active or working telephone numbers. Numbers associated with a service that has been suspended or terminated are not considered active or working telephone numbers. Rogers referenced paragraph 88 of Telecom Decision 2006-28, which lists the criteria for denying a customer-initiated porting request. These were developed through consensus by the CRTC Interconnection Steering Committee Business Process Working Group. The criteria specify that wireless carriers may only deny a customer-initiated porting request when the telephone number is not working due to a customer or company-initiated termination. Given that service to Ztar and, in turn, service to Ztar's customers has been terminated, Rogers is of the view that it has fulfilled its porting obligations.

19. Rogers added that customer requirements for porting requests before termination or suspension of service are also reflected on the Commission's website. This information states that if customers wish to keep their telephone number, their new service provider must transfer it and their existing services must still be active, which is not the case here.

The impact of granting relief on customers

20. According to Ztar, the disconnection from Rogers' WAM system causes Ztar and its customers severe harm. Ztar submitted that, if it is not granted access to Rogers' WAM system to complete the porting process, up to 40,000 disconnected end-users who have not yet migrated to another network or requested porting may not be able to retain their telephone numbers. For Ztar, being removed from Rogers' WAM system would make it incapable of assisting its disconnected customers with porting and result in it having to rebuild an entirely new customer base or cease its operations entirely.

21. Ztar added that the impact on end-users is illustrated by the number of complaints regarding porting that have been submitted against it to the Commission for Complaints for Telecom-television Services Inc. (CCTS).

22. Rogers submitted that, although Ztar claimed that 30,000 to 40,000 telephone numbers have not yet been ported, there is no reason to expect that this number of porting requests will be made in the future. Rogers indicated that there was no activity on the vast majority of customer numbers in the 90 days preceding the 11 December 2025 disconnection.

23. An individual intervener stated that they support Ztar's application because they have experienced issues caused by regulatory burden when transferring their mobile telephone number, which resulted in access and security issues.

The impact of granting relief on the Canadian telecommunications market

24. According to Ztar, the potential impact on Rogers from granting its requested relief would be minimal and would be far outweighed by the need to protect number portability, customers, and competition.

25. Rogers indicated that Ztar has defaulted on millions of dollars in payments owed to Rogers under their wholesale services agreement. Rogers added that it continued to provide Ztar access to its services until 11 December 2025, and to its WAM system until 22 January 2026, despite not receiving payment from Ztar. According to Rogers, it provided Ztar with extensions and notice of contract termination and disconnection of service. Rogers also highlighted that it gave Ztar clear notice of the 22 January 2026 disconnection date and provided Ztar with ample time to migrate its services and port customers.

26. Finally, Rogers stated that granting Ztar the requested relief would not be in the public interest because it would excuse Ztar from its contractual obligations and shift additional costs to Rogers without a clear mechanism for recovery. According to Rogers, there is no evidence of non-compliant conduct on Rogers' behalf or harm caused to Ztar or its customers.

27. Every-Day Computers submitted that it supports Ztar's application and urged the Commission to intervene against behaviours that it believes hinder competition.

28. Iristel stated that it supports Ztar's application because it would contribute to maintaining consumer access to wireless number portability.

Commission's analysis

29. Based on the record of the proceeding, the Commission is of the view that Ztar was given clear notice of disconnection and provided with multiple extensions. Ztar had approximately one year to port its customers from the time Rogers issued its first notice until disconnection on 11 December 2025. As noted by Rogers, the Commission's website indicates that Canadians can keep their number only if their existing services are still active and, in accordance with Telecom Decision 2006-28, wireless carriers may only deny a customer-initiated porting request when the telephone number is not working due to a customer or company-initiated termination. The Commission notes that, upon termination of the contract between Rogers and Ztar, Rogers was no longer obligated to provide services to Ztar.

30. The Commission therefore considers that Rogers fulfilled its contractual obligations to Ztar and provided sufficient notice to Ztar of the impending disconnection. Furthermore, Rogers' actions are consistent with the Commission's policies on number porting.

31. The Commission notes that Ztar customers whose telephone numbers have not been ported had already been disconnected for over six weeks before Ztar's application was submitted. During

that period, their numbers would have been returned to Rogers' numbering inventory and therefore may already have been reassigned to other customers.

32. According to the record, 30,000 to 40,000 telephone numbers will be impacted by this decision. If the requested relief is granted, those numbers would not be available to be reassigned for an indefinite period. In the Commission's view, this would be inconsistent with proper numbering resource management as considered in previous Commission decisions.[1] The record shows that the vast majority of those numbers had not been used in the 90 days preceding their disconnection, meaning that porting may never be requested for them.

33. The Commission considers that granting the requested relief could also have unintended consequences. Requiring Rogers, which complied with its obligations, to provide a further extension to Ztar without assurance that overdue payments from Ztar will be recovered may influence how the industry approaches future disconnections. For example, service providers may have less incentive to prepare for disconnections and notify their customers of them if they believe that services can be extended indefinitely.

34. The Commission acknowledges the impact that losing a telephone number may have on customers. However, the Commission is of the view that denying relief in this case aligns with established disconnection and numbering management practices.

35. The Commission therefore denies the request for access to Rogers' WAM system to port the telephone numbers of disconnected customers.

36. Regarding the request for interim relief, the Commission notes that it is not strictly necessary to address that request given this decision addresses final relief. However, for additional clarity and to ensure all issues are addressed comprehensively, the Commission notes that it would have denied the request for interim relief because Ztar did not establish that it would suffer irreparable harm if the relief were not granted in line with the RJR-MacDonald test.[2]

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[1] See Commission statements in Telecom Notice of Consultation 2026-61; Telecom Decisions 2025-321, 2025-236, 2025-236-1, and 2025-224; and Telecom Regulatory Policy 2024-26.

[2] The Commission's general practice is to require that an applicant demonstrate that its interim relief request meets all three criteria of the RJR-MacDonald test, namely that:

- there is a serious issue to be determined;
- the applicant would suffer irreparable harm if the relief is not granted; and
- the balance of convenience favours granting the relief.

37. Ztar claimed that not being able to port numbers could result in reputational harm, causing it to lose existing customers and decreasing the likelihood of new customers subscribing to its services.

38. The Commission notes that reputational harm is, by its nature, speculative and generally not sufficient to meet the criterion of irreparable harm under the RJR-MacDonald test. Moreover, the Commission notes that Ztar was aware of the impending service termination as of December 2024 and of Rogers' intention to disconnect services in June 2025. In the Commission's view, Ztar could have taken steps to avoid the harm it now raises, including informing customers of the network shutdown and service transfer requirements sooner, assisting them with transfers in a timelier manner, and filing an application with the Commission before disconnection occurred.

Conclusion

39. In light of all of the above, the Commission denies, by majority decision, the application for relief.

40. Customers may seek to reconnect their services with Ztar or with another service provider. In doing so, they should be aware that they may not be able to retain or recover their previous telephone numbers. Given that Rogers holds the telephone numbers previously used by Ztar, Rogers may be in the best position to provide information to customers about whether their numbers may be retained or recovered.

41. The Commission directs Ztar Mobile Canada, Inc. to clearly inform its disconnected customers, including those of its associated brands, about alternative ways to obtain cellphone services. The Commission also directs Ztar Mobile Canada, Inc. to clearly communicate to all its disconnected customers, including those of its associated brands, that the CCTS is available to address individual complaints if they experience problems related to their service. The Commission expects Ztar to continue to support its disconnected customers in their service transition, and Ztar should use all available contact methods in communicating with its customers.

42. These determinations reflect the Commission's commitment to fostering a competitive and well-functioning telecommunications market for the benefit of all Canadians.

Secretary General

Dissenting opinion of Commissioner Bram Abramson

1. I join the majority in finding that Ztar Mobile Canada, Inc. (Ztar) has not established a basis to require Rogers Communications Canada Inc. (Rogers) to restore wireless activation management (WAM) access. But the majority's approach focuses too much on the bilateral dispute and not enough on the customers it leaves unmoored, or those who will be left unmoored when another provider exits. The Canadian telecommunications system is required to respond to users' economic and social requirements. That includes prudential regulation to ensure provider exit does not, by itself, extinguish a former customer's opportunity to recover an available telephone number.

2. The majority limits its efforts in this regard to observing that, as Rogers holds the telephone numbers previously used by Ztar, Rogers may be best placed to tell customers whether their numbers can be retained or recovered. But the disappearance of the ordinary porting pathway does not necessarily erase the underlying customer-number relationship. Where that relationship can still be reliably established and the number has not been reassigned, meeting users' economic and social requirements means taking reasonable steps to keep recovery possible, where this can be done reliably and proportionately.

3. I would therefore go further. In this case I would require Ztar to preserve the validation capability for the existing cohort, and Rogers to provide only the cooperation reasonably necessary where an existing recovery path remains available. To turn the lesson of this case into systemic resilience, I would ask the CRTC Interconnection Steering Committee (CISC) how and whether to generalize that function on privacy-protective rails.

4. That conclusion does not minimize what Rogers did or excuse what Ztar did not. Rogers provided what became a one-year notice of disconnection and took meaningful steps to assist the transition, including temporarily reopening its WAM system after disconnection to facilitate additional ports. Ztar did not fully use the repeated opportunities to move its customers. But to reduce this matter to a dispute between Rogers and Ztar alone would be to ignore the users for whom the system exists. Some customers emerged from the process lacking a workable means to recover numbers that, today, are deeply embedded in how Canadians organize their lives. The application is about Ztar. The problem is not.

5. The majority[1] recognizes this. It cautions former Ztar customers that they "may not be able to retain or recover their previous telephone numbers," points to Rogers as "in the best position to

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[1] Of the Telecommunications Committee, on behalf of the Commission: *Telecommunications Committee*, By-Law No. 10 (CRTC), paragraph (e) ("[a]ny act or thing done by the Telecommunications Committee shall be deemed to be an act or thing done by the members […]"), pursuant to paragraph 11(1)(b) and subsection 12(3) of the *Canadian Radio-television and Telecommunications Commission Act*, R.S.C. 1985, c. C-22 (CRTC Act) (duties delegated to standing committees by by-law, as distinguished from assigning a particular file to a panel: *Shoan v. Canada (Attorney General)*, 2016 FCA 261, para. 6, with respect to the CRTC Act, subsection 6(2))

provide information," directs Ztar to tell customers about alternative services and the Commission for Complaints for Telecom-television Services Inc. (CCTS), and expects Ztar to continue supporting its customers in their transition.[2] But it does not consider whether preserving the missing validation function could address the problem it identifies. I dissent. The record is sufficient to decide that much.

The ordinary rule remains sound

6. The majority's starting point is appropriate. Numbers are finite resources. Portability normally supports active service, disconnected numbers must eventually return to inventory, and finality matters. Indefinitely preserving numbers for former customers who might never return would impose undue costs on providers while impeding productive reuse.

7. But numbers are not pressed into service immediately upon provider exit. The controlling *Canadian Thousands-Block (NXX-X) and Central Office Code (NXX) Assignment Guideline* (Canadian TBCOCAG), itself newly retitled and revised to effectively manage limited numbering resources,[3] provides that disconnected telephone numbers are to be made temporarily unavailable, or "aged", for reassignment for 1 to 3 (residential and wireless) or 3 to 12 (business) months.[4] This aging interval is an intermediate state between active status and unrestricted assignment, during which the number cannot be reassigned to another customer, but may be returned to the customer who originally disconnected it when reconnecting with the same telecommunications service provider (TSP).[5]

8. The ability to "enable the disconnecting customer to re-connect service, using the same telephone number and TSP during the Aging Interval" is listed as one of the "four primary purposes of Aging".[6] The Canadian TBCOCAG therefore recognizes expressly that disconnection need not instantly extinguish every practical possibility of returning a number to its former user.

9. The TBCOCAG stops a step short of the circumstance here. Its reconnection rule assumes that the Disconnecting TSP remains available to reconnect its customer. But a provider exit can remove that actor from the process. That distinction supports a narrow recovery principle. A validated last user is a customer whose association with a telephone number, immediately before the ordinary porting chain broke, can be authenticated to an appropriate level of assurance. That customer should retain the opportunity to reconnect to the number so long as the number remains available. Reassignment would end that opportunity.

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[2] Majority decision (above), paragraphs 20, 40, and 41.

[3] Telecom Decision 2026-167, paragraphs 22 to 27.

[4] Canadian TBCOCAG, Appendix F ("Aging and Administration of Disconnected Telephone Numbers"), section 5.1.

[5] Canadian TBCOCAG, Appendix F, sections 4.4 and 4.6.

[6] Canadian TBCOCAG, Appendix F, section 3(d).

10. Post-aging reassignment remains the natural endpoint. Once another customer receives the number, the former customer has no further claim to it. This recovery opportunity would create no continuing property or other interest in a disconnected telephone number. For this narrow class of cases associated with provider exit, reassignment rather than disconnection would supply necessary finality.

Ample opportunity does not answer the residual case

11. The majority also has strong grounds for underlining the opportunities that Ztar's brands' customers already had. Rogers provided what became a one-year notice of disconnection. I need not take a position on the adequacy of this notice period[7] or its punctuated character to agree that Ztar bore responsibility for managing its own customers' transition. The record indicates a gap in Ztar's written communications to subscribers during part of the period before disconnection, following earlier regular notices.[8] Ztar itself refers to a "porting/execution constraint issue".[9] Rogers submitted that the vast majority of unported numbers showed no outgoing calls, texts, or data usage during the 90 days before disconnection.[10]

12. These facts do not favour a broad rescue obligation, nor provide a basis to infer that most unported numbers correspond to a customer seeking recovery. Nor, however, do they answer the narrower question raised by interveners, regarding consumer protection and stranded customers, and by the public record itself, which evidences that at least some customers continued trying to port after disconnection.[11] A customer who comes forward, has all of the necessary information to prove association with an unreassigned number, and bears the consequences of delay is different from a rule that preserves every disconnected number just in case.

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[7] Rogers' notice of disconnection to Ztar was a major change relating to phasing out Rogers' 3G network. In the past, major network-wide architecture phase-outs have attracted a two-year notice period. See Telecom Regulatory Policy 2011-703, paragraphs 152 to 153 and Telecom Decision 2013-73, paragraphs 96 to 99 (24-month period for HSA users to migrate from legacy disaggregated to aggregated points of interconnection) and Telecom Decision 2021-385, paragraphs 6 to 9, 39 to 40, and 73 to 76 (two-and-a-half years' notice, between initial notification and ultimate network incompatibility, sufficed before disconnecting legacy DOCSIS 3.0 modems).

[8] In response to a request for information concerning customer communications between Rogers' final 10 November 2025 disconnection notice and disconnection on 11 December 2025, Ztar acknowledged that it did not send written communications to subscribers during that period, while stating that written communications had been sent regularly during the preceding three months. Response to Request Ztar(CRTC)09-04-26-1.

[9] Response to Request Ztar(CRTC)09-04-26-3. Ztar further provided that "[a]ny remaining customer impact was not the result of insufficient notice, but rather external constraints affecting porting capacity and processing during the migration period": Response to Request Ztar(CRTC)09-04-26-1. The record does not disclose whether a bulk port was attempted.

[10] Rogers, Answer, 16 February 2026, paragraph 28.

[11] Ztar, Application, 27 January 2026, paragraph 4 ("[…] numerous complaints regarding consumers who are unable to complete their port requests.").

13. Telephone numbers now sit at the centre of personal relationships as well as authentication and ongoing relationships. Not only do employers, public services, family, and friends rely on them: banks also send security codes to them; medical offices use them to reach patients. Reliance on Short Messaging Service text-based authentication may not be best security practice,[12] but it has become the general practice. Replacing wireless service is relatively easy; reconstructing everything attached to a number may not be. Given this reliance, and given the consumer protection mandate assigned to us by both statute and executive direction,[13] it is hard to explain why, when (a) the systems capable of processing a valid recovery request remain operational, (b) the customer remains, and (c) the number has not been reassigned, the pieces cannot be coordinated so that the customer can be reconnected with their telephone number.

14. Consider, by analogy, the traveller who can see, through a personal tracker, exactly where an airline has placed a checked bag, while the airline's own system reports that it cannot be found. The bag has not vanished: the traveller's proof and airline's recovery process have been disconnected. A provider exit can produce a similar break between a customer's ability to establish an association with a number and the system's ability to act on that association. The safeguard proposed here is self-limiting in the same way. It serves only customers who come forward and satisfy the required authentication standards before reassignment.

A backstop need not weaken the ordinary rule

15. A backstop can create moral hazard if it shifts the consequences of failed transition entirely away from the actor responsible for preventing it. That is why any recovery mechanism must preserve primary responsibility for timely porting, adequate notice, and orderly exit. Customers should still port promptly. Exiting providers should still conduct orderly wind-downs. Underlying carriers should not become guarantors of failed resellers.

16. Ordinary portability should remain the rule. A provider-exit portability backstop within the aging window addresses circumstances in which provider exit has broken the ordinary path to recovery. Even then, the exiting provider has reputational and liability skin in the game, while the unported customer still bears uncertainty.

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[12] *Digital identity guidelines: authentication and lifecycle management,* U.S. National Institute of Science and Technology (NIST) Special Publication 800-63B, June 2017. Updated by *Digital identity guidelines,* NIST Special Publication 800-63-4, July 2025.

[13] *Telecommunications Act,* paragraph 7(h): to respond to the economic and social requirements of users of telecommunications services; and *Order Issuing a Direction to the CRTC on a Renewed Approach to Telecommunications Policy*, SOR/2023-23, sub-paragraph 17(b)(iv): The Commission must enhance and protect the rights of consumers in the telecommunications market by strengthening the position of consumers in their relationships with service providers, including by taking measures to ensure that consumers can promptly, affordably, and easily cancel, downgrade, transfer, and otherwise change their services.

17. Rogers’ voluntary transition assistance deserves recognition, but illustrates why a predictable framework matters. Another underlying carrier faced with another unchoreographed exit may reasonably do less. Residual consumer protection should not depend on voluntary accommodation after the commercial relationship has ended.

18. The record identifies a narrower function than WAM that should be preserved: the ability to establish whether a person seeking to port was the customer associated with an affected number, so that recovery could proceed where Rogers’ existing processes otherwise allow. Customer verification and account validation are necessary parts of the porting process: Rogers itself says Ztar should maintain the relevant information in its own systems;[14] Ztar, for its part, itself says WAM is not the relief it needs.[15] This would only require Rogers to cooperate with a validated request where existing processes permit recovery, avoiding dressing Rogers up as any sort of guarantor of Ztar’s exit.

19. I would therefore require Ztar, for a limited period, either to preserve the information and capability needed to validate whether a claimant was the last user associated with an affected number immediately before the ordinary porting path broke, or to designate a privacy-bound intermediary to play this role for it, provided the arrangement satisfied the same privacy and security safeguards:

    - Ztar should use no more customer information than is reasonably necessary to validate a claim and support any ensuing recovery process. Likewise, any arrangement with an intermediary in the event Ztar is unable to fulfil this function should not involve wholesale transfer of Ztar’s customer database. Confidentiality, purpose limitation, security, auditability, and appropriate retention should govern the validation method.[16] Rogers should not assume responsibility for maintaining or reconstructing Ztar’s customer records.

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[14] Rogers submitted that WAM completes ports within the applicable timeline when customer-verification and account-validation information is provided on time; that delays in supplying that information are Ztar’s responsibility; and, specifically, that Ztar “should not rely on the wholesale portal for port out validation” because it “should have this information in its own billing systems”: Rogers, Answer, 16 February 2026, paragraphs 60 and 61.

[15] Ztar, Reply, 2 March 2026, paragraph 3 (“Ztar is not asking for WAM system access; it is asking for port-out access for its customers”).

[16] The Commission’s long-standing Confidential Customer Information (CCI) provisions include, as one of seven permitted disclosures, the disclosure to “another telephone company, provided the information is required for the efficient and cost-effective provision of telephone service and disclosure is made on a confidential basis with the information to be used only for that purpose”: Appendix to Telecom Decision 2022-238. Notwithstanding this provision, the Commission has a responsibility, in my view, to try to design processes so that the same purposes can be achieved without such disclosures: generally, *Telecommunications Act,* paragraph 7(i) (contribute to the protection of the privacy of persons).

- If Ztar cannot perform the validation function, or if Rogers considers that no recovery path is available for a validated number through processes readily available to it, the party relying on that constraint should identify it to the Commission.

- The period would be limited by the applicable aging interval, or until reassignment or other technical unavailability makes recovery impossible, whichever occurs first.

- Where a claim is validated, Rogers should provide the cooperation that is reasonably necessary for recovery where an existing process is available to do so.

20. This recovery mechanism is narrower than the relief Ztar seeks, and places the primary continuity obligation on the provider that held the customer relationship.[17] The record squarely addresses the underlying functional question of who must preserve and supply the information needed to validate a port-out request once ordinary access has ended. The obligation would not remedy any misconduct by Rogers. It would preserve a function the existing framework assumes but does not secure when the customer-facing provider exits.

From this case to a durable approach

21. The remedy above also answers the majority's concern about inactive numbers. Under the proposed recovery mechanism, to recover a number, the former customer of a Ztar brand would have to come forward and pass validation before reassignment or some other technical constraint foreclosed recovery. The mechanism would have operated based on actual demand rather than inferring demand from the size of Ztar's former customer base.

22. This arrangement would preserve a critical function for the customers whose interests were before us in this proceeding. It would also generate evidence that would assist the industry in returning to determine how to make this function durable. In 2002, the Business Process Working Group (BPWG), a working group of the CRTC Interconnection Steering Committee (CISC), developed[18] the *Local Service Provider (LSP) Business Termination Guidelines* (Termination Guidelines) to address situations, like Ztar's, "where there is no arrangement for an LSP to acquire all of the customers of another LSP exiting the marketplace". "The goal of these guidelines is to migrate customers from an LSP that is exiting the market to other LSPs with

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[17] *Telecommunications Act*, sections 23 (port-out validation and the processing necessary to preserve a customer's opportunity to recover a number are incidental to the provision and transfer of telecommunications service), 24, and 24.1 (conditions on telecommunications services offered or provided by Canadian carriers and by other persons, respectively). Commission practice does not suggest that section 24 is confined to industry-wide rulemaking; in any event, the conditions here would attach directly to the porting and validation functions at issue in this proceeding.

[18] *LSP Business Termination Guidelines*, BPWG Report BPRE031b (consensus), 30 September 2002. See also proposed revisions in *Mergers, Acquisitions and IXC Disconnections,* BPWG Report BPRE031c (consensus), 11 December 2002, approved in Telecom Decision 2003-35.

minimal interruption of service to each customer".[19] The salience of that goal was clear then and is clear now.

23. Among the Termination Guidelines' requirements was that every LSP, including local exchange carriers (LECs) and resellers of LEC services, ought to maintain an up-to-date list of the customers it serves as an ongoing activity of providing local telephone service, to be stored in either a printed or electronic format.[20] In 2026, the question is whether that older failure-state architecture can be adapted to create a privacy-protective authorization tool in a situation where the customer-facing provider can no longer perform its role.

24. Three functions have to work together: (i) authenticate the last number claimant to the required level of assurance; (ii) establish that the number's status that still permits recovery; and (iii) enable a valid recovery request to be acted upon. I would direct the BPWG to review whether the Termination Guidelines can be modernized to connect those functions reliably and proportionately.

25. Modernization that seeks to connect these functions might expose hard limits. Aging status may not be visible or actionable across providers. Whole-provider termination may not generate ordinary per-number aging records. Authentication could become unreliable once a provider disappears. One possibility is to examine how the 2002 customer-list requirement could be translated into a post-2026 authentication tool. Such a tool might direct LSPs to maintain records in structured, privacy-enhancing formats, so that a last number claimant could be authenticated without exposing any underlying personal information.[21]

26. A negative answer is a permissible result. If no generalized approach can connect those functions at proportionate cost and risk, none should be adopted. Regardless, the role of the Termination Guidelines should likely be clarified and, if they remain relevant, their content updated. In either case, that does not alter what I would do on the facts at hand here: require Ztar to preserve the customer-validation capability it says is necessary, and require from Rogers only such cooperation as its existing recovery processes can reasonably support.

27. The majority treats disconnection as necessarily final. I would treat reassignment as necessarily final.

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[19] *LSP Business Termination Guidelines version 1.0* (Termination Guidelines), 30 September 2002, sections 1.2 and 2.0.

[20] Termination Guidelines, sections 5.1 and 5.2.

[21] Privacy-enhancing techniques akin to zero-knowledge proofs, which allow for verification and authentication without revealing underlying personal information, ought to be considered for reliable validation that will minimize disclosure of underlying customer information. Likewise, open specifications could support interoperability, independent implementation, and auditability. See, for instance, the California Privacy Protection Agency's implementation of a Delete Request and Opt-out Platform (DROP), which illustrates a regulator-specified common process for privacy-protective matching across independent businesses. More generally, see footnote 16 of this dissent (above).

Related document

- *CISC Canadian Steering Committee on Numbering – Consensus reports CNRE145A, CNRE157A, and CNRE158A – Non-geographic code assignment guidelines and implementation of thousand-block pooling*, Telecom Decision 2026-167, 10 July 2026
- *Call for comments – Strengthening numbering usage management practices*, Telecom Notice of Consultation CRTC 2026-61, 2 April 2026
- *Modification of deadline for thousand-block pooling*, Telecom Decision CRTC 2025-321, 28 November 2025
- *Canadian Numbering Administration Consortium, Inc. (CNAC) – Application requesting approval for a change to the funding model used by CNAC for numbering administration purposes*, Telecom Decision CRTC 2025-236, 10 September 2025, as amended by Telecom Decision CRTC 2025-236-1, 10 November 2025
- *CISC Canadian Steering Committee on Numbering – Consensus report CNRE138B – Methods to address the high assignment rate of non-geographic (6YY) CO codes*, Telecom Decision CRTC 2025-224, 2 September 2025
- *Implementing thousand-block pooling*, Telecom Regulatory Policy CRTC 2024-26, 5 February 2024
- *Public Interest Advocacy Centre – Request to define the privacy requirements for telecommunications service providers in the context of any digital contact tracing technologies app*, Telecom Decision CRTC 2022-238, 6 September 2022
- *Competitive Network Operators of Canada – Application requesting relief from Rogers Communications Canada Inc. concerning Data Over Cable Service Interface Specification (DOCSIS) 3.0 modems*, Telecom Decision 2021-385, 19 November 2021
- *Iristel Inc. – Application for interim relief regarding Bell Canada's rate increases for certain circuits*, Telecom Decision CRTC 2019-86, 21 March 2019
- *Canadian Network Operators Consortium Inc. – Application to review and vary Telecom Regulatory Policies 2011-703 and 2011-704*, Telecom Decision CRTC 2013-73, 21 February 2013
- *The customer transfer process and related competitive issues*, Broadcasting and Telecom Regulatory Policy CRTC 2011-191, 18 March 2011
- *Billing practices for wholesale residential high-speed access services*, Telecom Regulatory Policy CRTC 2011-703, 15 November 2011

- *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

- *CRTC Interconnection Steering Committee – Consensus items*, Telecom Decision CRTC 2003-35, 4 June 2003