



Telecom Decision CRTC 2026-55

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Reference: Part 1 application posted on 28 February 2025

Gatineau, 1 April 2026

Public record: 8698-J64-202500975

Iristel Inc. – Application regarding delays by Bell Canada when routing new central office codes obtained by Iristel

Summary

On 10 February 2025, Iristel Inc. (Iristel) filed an application with the Commission alleging that Bell Canada engaged in anti-competitive behaviour. Specifically, Iristel alleged that Bell Canada repeatedly did not route calls made over Bell Canada voice networks to new Iristel central office (CO) codes within the industry-standard time frame for doing so. In its application, Iristel requested that the Commission find Bell Canada in violation of subsection 27(2) of the *Telecommunications Act* (the Act), impose administrative monetary penalties (AMPs), and impose additional orders on Bell Canada. In response to Iristel's application, Bell Canada identified that some of the delays experienced by Iristel should be attributed to TELUS Communications Inc. (TELUS).

Commission staff issued requests for information (RFIs) to Bell Canada, Iristel, and TELUS on 9 May 2025, 19 June 2025, 26 September 2025, and 3 November 2025 to clarify the timing and nature of delays.

Based on the record of this proceeding, including the information gathered through RFIs, the Commission cannot establish that Bell Canada engaged in anti-competitive behaviour in its approach to routing new Iristel CO codes. Accordingly, the Commission is of the view that any disadvantage resulting from the delays Iristel experienced is not unjust or undue for the purpose of subsection 27(2) of the Act. Since the Commission has not determined that a violation of the Act occurred, imposing AMPs on Bell Canada is not appropriate in this case.

While the Commission continues to be mindful of regulatory burden on telecommunications service providers, it will continue to monitor CO code routing to help ensure that competitors are not unnecessarily impacted by delays. The Commission therefore directs Bell Canada to file a report by **1 October 2026** outlining measures to improve its trouble ticket resolution process over the next six months, which will be placed on the public record. The Commission will review this report and is prepared to take further action, if Bell Canada does not make meaningful improvements.

Background

1. To offer new telephone numbers, telecommunications service providers (TSPs)¹ must obtain central office (CO) codes from the Canadian Numbering Administrator (CNA). The CNA administers CO codes in accordance with the Canadian Central Office Code Assignment Guideline (the CO Code Guideline).
2. The CO Code Guideline requires that after acquiring a CO code from the CNA, the TSP must enter its details into a routing database² so that other TSPs can update their systems. This ensures that CO codes are activated on time and that calls to active telephone numbers within those CO codes can be completed.
3. In addition to the CO Code Guideline, TSPs acquiring new CO codes usually follow the Global Title Translation (GTT) Point Code Industry Notification Process³ (the GTT Notification Process). While the GTT Notification Process supports interoperability, it is separate from the CO code activation process and is not required to route CO codes by their effective date.

Application

4. On 10 February 2025, Iristel Inc. (Iristel) filed an application alleging that Bell Canada engaged in anti-competitive behaviour by repeatedly not routing calls made over Bell Canada, Bell Mobility Inc. (Bell Mobility), and other Bell Canada subsidiary voice networks to new Iristel CO codes within the industry-standard time frame for doing so (i.e., by the effective date of the CO codes).
5. In its application, Iristel requested that the Commission:
 - issue an order directing Bell Canada to route CO codes from competitors on or before the effective date shown on the GTT notifications, if the effective date is at least 30 days after the day on which the GTT notification is sent;

¹ For the purpose of this decision, “TSP” refers to Canadian providers who obtain numbering resources directly from the CNA. This excludes providers who obtain numbering resources through resale.

² The Business Integrated Routing and Rating Database System is the centralized system used to share the information needed to route and rate calls properly.

³ The CNA plays no role in the management of GTT. However, to support Canadian TSPs, the Canadian Steering Committee on Numbering developed the GTT Notification Process.

- issue an order directing Bell Canada to appoint a technical resource from its translations team to handle telephone routing complaints from other carriers and to adopt a process whereby routing issues can be corrected consistently and without delays;
 - find that by delaying routing of Iristel’s newly acquired CO codes, Bell Canada unjustly discriminated against Iristel, Iristel’s wholesale customers, and the retail customers that subscribe to Iristel’s wholesale customers, in violation of subsection 27(2) of the *Telecommunications Act* (the Act); and
 - impose administrative monetary penalties (AMPs) on Bell Canada to discourage further anti-competitive behaviour.
6. The Commission received an answer from Bell Canada regarding the application. In its answer, Bell Canada identified TELUS Communications Inc. (TELUS) as a relevant third party given that many of the CO codes for which Iristel’s reachability testing failed were located in TELUS’s territory.
7. Commission staff issued requests for information (RFIs) to Bell Canada, Iristel, and TELUS on [9 May 2025](#), [19 June 2025](#), [26 September 2025](#), and [3 November 2025](#) to clarify the timing and nature of delays.

Issues

8. The Commission has identified the following issues to be addressed in this decision:
- Should the Commission issue an order directing Bell Canada to route CO codes from competitors on or before the effective date shown on the GTT notifications if the effective date is at least 30 days after the day on which the GTT notification is sent?
 - Should the Commission order Bell Canada to appoint a technical resource from its translations team to handle telephone routing complaints from other carriers and to adopt a process whereby routing issues can be corrected consistently and without delay?
 - Did Bell Canada unjustly discriminate against Iristel? If so, should the Commission impose AMPs on Bell Canada?

Should the Commission issue an order directing Bell Canada to route CO codes from competitors on or before the effective date shown on the GTT notifications if the effective date is at least 30 days after the day on which the GTT notification is sent?

Positions of parties

9. In support of its application, Iristel provided a list of 42 CO codes that, between March 2024 and January 2025, failed reachability tests 30 days after Iristel's GTT notifications. Iristel conducted these reachability tests using devices subscribed to mobile networks, including Bell Mobility's.
10. Bell Canada noted that Iristel requested 286 CO codes in 2024, the majority of which were routed by the effective date.
11. Bell Canada added that the GTT Notification Process has no bearing on CO code activation and that it was inappropriate for Iristel to expect calls to new CO codes to be processed correctly based on the 30-day GTT notifications timeline.

Commission's analysis

12. Through RFIs, the Commission determined that Iristel submitted its GTT notifications less than 30 days in advance for 29 of the 42 CO codes Iristel stated as having failed reachability testing on their effective date. These cases should be excluded from the assessment of Iristel's request because it is not reasonable to expect Bell Canada to route these CO codes by their effective date with fewer than 30 days notice.
13. Of the 13 remaining CO codes for which Iristel submitted its GTT notifications at least 30 days before the effective date, TELUS confirmed that seven failures occurred over its network and not Bell Canada's. These seven cases fall outside of Bell Canada's control and should also be excluded from the assessment of Iristel's request.
14. This leaves a total of six CO codes for which Iristel submitted its GTT notifications at least 30 days before the effective date and for which Bell Canada is responsible for delays in proper routing. The Commission notes that this represents approximately 2.1% of all CO codes activated Canada-wide by Iristel.
15. In light of the above, the Commission is of the view that the scope of routing issues occurring over Bell Canada's network does not provide a sufficient basis for the Commission to issue an order to Bell Canada directing it to route CO codes from competitors on or before the effective date shown on the GTT notifications where 30 days notice has been provided.
16. The Commission also notes that Bell Canada is already subject to the Commission-approved CO Code Guideline, which regulates CO code activation. Issuing a specific order governing Bell Canada's routing to new CO codes would be duplicative. The Commission therefore denies Iristel's request to issue an order regarding CO code activation.

Should the Commission order Bell Canada to appoint a technical resource from its translations team to handle telephone routing complaints from other carriers and to adopt a process whereby routing issues can be corrected consistently and without delay?

Positions of parties

17. In its application, Iristel submitted that it had repeatedly tried to escalate the matter of repeated delays to Bell Canada's carrier relations team, but that the overall issue has still not been corrected. According to Iristel, Bell Canada's trouble ticket process for reporting routing issues is burdensome and unreliable since Iristel must submit a separate ticket for each failed CO code activation. Iristel explained that responses from Bell Canada are inconsistent, with some trouble tickets being closed before the problems are fixed. Iristel submitted that having an appointed technical resource would ensure that the person assigned to a trouble ticket would be familiar with the CO code activation process.
18. Bell Canada indicated that it has already identified and resolved the issues that were within its responsibility in accordance with the Network Management Guidelines. Bell Canada also reviewed and improved its internal processes after Iristel escalated the matter, resulting in a reduction in reported issues. Bell Canada committed to providing a report on its progress to improve its trouble ticket resolution process within six months.
19. TELUS indicated that after Iristel escalated the issue with Bell Canada, it implemented safeguards to address Iristel's CO code activation delays. These safeguards include regular audits of automated processes and a manual verification step. Since these measures have been introduced, Iristel has reported no activation delays in the past six months for CO codes located in TELUS's territory.

Commission's analysis

20. The Commission notes that Bell Canada opened trouble tickets for all 42 CO codes listed by Iristel as having experienced routing issues, despite some delays being attributable to TELUS. For the CO codes that experienced routing issues attributable to Bell Canada, reachability tests were successful within an average resolution time of 5.4 days. The Commission considers that these timelines fall within a reasonable range for issue resolution given the complexity of the CO code activation process.
21. The Commission considers that, given the limited scope of the delays in resolving the issues raised by Iristel, and that Iristel is the only party having presented evidence of multiple CO code routing issues involving Bell Canada, the appointment of a technical resource from Bell Canada's translations team for CO code routing complaints is not warranted.
22. The Commission recognizes that these timelines may still impact Iristel's service to customers, particularly in light of Iristel's evidence that some trouble tickets were closed by Bell Canada before the underlying issues were fully resolved. As such, the Commission considers that there is room for Bell Canada to improve its trouble ticket resolution process. The Commission

acknowledges that Bell Canada's efforts to review and improve its internal processes have led to a reduction in issues, and that Bell Canada has committed to providing a progress report on improvements made to its internal processes.

23. In light of the above, the Commission denies Iristel's request to issue an order directing Bell Canada to appoint a technical resource from its translations team for CO code routing complaints. However, while the Commission continues to be mindful of regulatory burden on telecommunications service providers, it will continue to monitor CO code routing to help ensure that competitors are not unnecessarily impacted by delays. To monitor the progress of improvements Bell Canada makes to its trouble ticket resolution process, the Commission directs Bell Canada to file, by **1 October 2026**, a public report detailing all the measures it implements to reduce resolution times for CO code routing trouble tickets, both for CO codes within its own incumbent operating territory and those involving third-party providers. The report should include: process changes, system updates, and details of communications with third-party providers, including the nature and outcome of these exchanges; metrics on resolution times, trouble ticket outcomes, and impacts on CO code activations and routing; ongoing challenges and actions taken to address them; supporting data; lessons learned; and planned next steps to further improve the process.
24. In addition to filing the report with the Commission for the public record, Bell Canada is to serve the report on Iristel and TELUS. The Commission will review this report and is prepared to take further action, if meaningful improvements are not made to Bell Canada's trouble ticket resolution process.

Did Bell Canada unjustly discriminate against Iristel? If so, should the Commission impose AMPs on Bell Canada?

Positions of parties

25. As noted above, Iristel alleged that for years, Bell Canada repeatedly failed to route calls made over Bell Canada, Bell Mobility, and other Bell Canada subsidiary voice networks to new Iristel CO codes within the industry-standard time frame. Iristel indicated that it tried to escalate the matter with Bell Canada's carrier relations team, but the overall issue has still not been corrected.
26. Iristel noted that it makes telephone numbers available to its customers only after reachability tests have been successful and stated that Bell Canada's repeated issues in routing calls to new CO codes resulted in delayed and lost revenue, as well as customer dissatisfaction. Iristel further submitted that these routing delays reflect a broader pattern of anti-competitive behaviour by Bell Canada, citing complaints related to other matters from AFX Communications Inc., Bravo Telecom, Fibernetics Corporation, and Quebecor Media Inc.
27. In support of its request for a finding under subsection 27(2) of the Act, Iristel submitted that Bell Canada's repeated delays in activating routing to Iristel's CO codes, combined with what it characterizes as inadequate operational support, unjustly discriminated against Iristel and

imposed an undue disadvantage that negatively affected Iristel's business and competitive position.

28. Bell Canada submitted that Iristel overstated its routing delays given that in 2024, Iristel submitted 286 CO code requests (approximately 46% of industry requests), over 85% of which were correctly routed by the effective date.
29. Further, Bell Canada indicated that only 14 of the 42 CO codes listed by Iristel were located in its territory. The other 28 were located in TELUS's territory of British Columbia and Alberta. In particular, Bell Canada and TELUS noted that one of the CO codes located in TELUS's territory was a false positive, and that Iristel had reported that the CO code was functioning correctly.
30. Bell Canada and TELUS also indicated that of the remaining 27 CO codes that failed reachability tests in TELUS's territory, 20 were due to a TELUS error or delays in updating its area code and CO code automation logic. The other seven were due to Bell Canada routing traffic to a TELUS network entry point not configured for Iristel traffic. TELUS noted that this is not unusual and happens to carriers on occasion.
31. In total, 21 CO codes that failed reachability tests could be attributed to Bell Canada: 14 in its own territory, and seven in TELUS's territory for which it mistakenly routed traffic to the wrong network entry point.
32. Bell Canada submitted that these routing issues impact Bell Canada and its customers as well. Bell Canada indicated that there is no advantage to it not activating CO codes and that any errors were not deliberate. As such, Bell Canada did not share Iristel's views and stated that the request for AMPs is unwarranted and unjustified.

Commission's analysis

33. Subsection 27(2) of the Act provides that no Canadian carrier shall, in relation to the provision of a telecommunications service or the charging of a rate for it, unjustly discriminate or give an undue or unreasonable preference toward any person, including itself, or subject any person to an undue or unreasonable disadvantage. In applying this statutory test, the Commission must assess whether the record demonstrates conduct that conferred a preference on Bell Canada or disadvantaged Iristel and whether any such preference or disadvantage was undue or unreasonable.
34. The Commission notes that although Iristel asserted that Bell Canada has been delaying CO code routing for several years, the Commission's assessment is limited to the 42 CO codes that Iristel claimed were delayed in 2024. As stated above, 21 CO codes that failed reachability tests could be attributed to Bell Canada. Since subsection 27(2) of the Act applies only to a carrier's own conduct, this significantly narrows the scope of Bell Canada's responsibility for the purpose of this proceeding.

35. The 21 routing issues that occurred over Bell Canada's network represent just over 7% of all CO codes activated by Iristel Canada-wide in 2024. Therefore, the Commission notes that more than 92% of Iristel's CO codes were successfully routed over Bell Canada's network. The Commission further considers the impact of these delays on customers to be minimal, since none of the numbers within the 21 affected CO codes had been assigned to Canadians.
36. The Commission acknowledges Iristel's submission regarding the deferred revenue caused by delays in placing telephone numbers into service and costs related to supplementary testing. As such, the Commission considers that Iristel did suffer a disadvantage because of these delays. However, given that the number of delayed CO code issues attributable to Bell Canada is half of what Iristel initially asserted, the Commission considers that these estimates overstate the portion of costs reasonably associated with the delays for which Bell Canada was responsible.
37. As stated above, the Commission established that the resolution time for routing issues for which Bell Canada was responsible averaged 5.4 days. The Commission considers that this timeline does not indicate intentional or sustained conduct aimed at disadvantaging Iristel. In addition, while the Commission acknowledges that Bell Canada closed some trouble tickets before the underlying issues were fully resolved, it considers that this should be weighed against the fact that Bell Canada opened trouble tickets for all Iristel complaints, even in cases where Bell Canada was not ultimately responsible for the issue.
38. The Commission does not consider that the scope of the issues and impacts identified on the record and attributable to Bell Canada demonstrates that Bell Canada granted itself an undue preference or imposed unjust disadvantages on Iristel.
39. In light of the above, the Commission is of the view that any disadvantage resulting from these limited and moderate delays is not unjust or undue for the purpose of subsection 27(2) of the Act.
40. The Commission is of the view that since no violation of the Act has been established, AMPs against Bell Canada are not appropriate in this case.

Conclusion

41. In light of all of the above, the Commission:
 - denies the request to issue an order directing Bell Canada to route CO codes from competitors on or before the effective date shown in GTT notifications where 30 days notice has been provided;
 - denies the request to issue an order directing Bell Canada to appoint a technical resource from its translations team for CO code routing complaints;
 - denies the request to find Bell Canada in violation of subsection 27(2) of the Act and denies the request to impose AMPs on Bell Canada; and

- directs Bell Canada to file, by **1 October 2026**, a public report detailing all the measures it implements to reduce resolution times for CO code routing trouble tickets, both for CO codes within its own incumbent operating territory and those involving third-party providers. The report should include: process changes, system updates, and details of coordination with third-party providers, including the nature and outcome of these exchanges; metrics on resolution times, trouble ticket outcomes, and impacts on CO code activations and routing; ongoing challenges and actions taken to address them; supporting data; lessons learned; and planned next steps to further improve the process. In addition to filing the report with the Commission for the public record, Bell Canada is to serve the report on Iristel and TELUS.

Secretary General