**16 April 2024**

**TIF 119 (Inclusion of unused numbers from previously assigned CO Codes in pool of available thousand-blocks)**

**CSCN Conference Call**

**Participants:** K.T. Walsh – CNA

Fiona Clegg – CNA

Natalie Lessard – CNA

Stephen Walsh – CNA

Alexander Pittman – CRTC staff

Allyson Blevins – Sinch/INC Co-chair

Anamika Bharti – Cogeco

Andy Kaplan-Myrth – Teksavvy

Bill Barsley – CNAC

Connie Hartman – iconectiv/TRA

David Plaunt – Bruce Telecom

Diane Dolan – Teksavvy

Dominique Germain – Sogetel

Edward Antecol – COMsolve

Étienne Robelin – CRTC staff

Jean-Sebastien Tremblay – Videotron

Jonathan Holmes – ITPA

Karen Robinson – KROB Telecom Solutions

Kevin Yao – Bell Mobility

Kim Brown – Eastlink/Bragg

Leo Santoro – Bell Mobility

Marc Berruyer – Videotron

Marcel Champagne – Neustar/Transunion

Marie-Christine Hudon – Bell Canada

Michael Studniberg – Rogers

Olena Bilozerska – TELUS

Sarah Halko – iconectiv/TRA

Sarah Reilly – Distributel

Tal Nirwan – TELUS

Tammy Wilson – SaskTel

Tara Farquhar – NANPA

Wanda Mali – Bell Canada

**Welcome:**

Kelly Walsh, as CSCN Chair and RPC Chair, welcomed the attendees.

Fiona Clegg reviewed the list of attendees.

**Discussion:**

It was noted that a Teksavvy contribution for TIF 119 (Inclusion of unused numbers from previously assigned CO Codes in pool of available thousand-block) had been received and posted on the CNA website. CNCO233A was presented by Diane Dolan.

During a discussion of item 6 in the contribution, which addresses how the snap-back process would work with any new mechanism(s), it was noted that there is a big difference between what happens in the US and Canada when numbers are in the aging process. The question was raised about how to deal with aging numbers. Ed Antecol noted that if a block is returned to the number pool, it can potentially be reassigned as soon as the following day.

In response to this observation, Tara Farquhar stated that while this is a possibility, a thousand block cannot have an effective date less than 45 days in the future. A participant suggested putting an availability date on the returned block and noted that the standard aging period for numbers in Canada is 90 days.

It was noted that if a number is aging it cannot be ported and snap-back would only occur if a number is ported out. If a number is ported out it is not in the aging pool.

It was noted that in the US, numbers in the aging pool are not part of the contamination calculation. In response a participant indicated that if you have less than 5% contamination, aging should be part of the calculation as the numbers will be in churn.

A participant indicated that the US has a central repository database for disconnected numbers which, while not an aging pool, lets people know when a number has been disconnected. In response, it was noted that Carriers do not generally look at the Reassigned Numbers Database (RND) and do not use it to verify if a number has been disconnected. It is used mainly by people to query whether a specific number is in service to the same customer. The example cited was a pharmacy establishing whether a customer’s telephone number that is on file is still in service for that customer. If the number has been reassigned to a new user, by using the RND the pharmacy could avoid accidentally contacting individuals who have not consented to receiving calls or texts from that pharmacy. Contacting someone who has not consented to receiving calls or texts could result in *Telephone Consumer Protection Act* violation fines.

It was suggested that a 90-day Effective Date is too long for reassignment of blocks.

It was noted that contamination needs to be defined for Canada. In response, it was noted that in the US a block could be returned on 1 March and reassigned the next day. However, the block could not have an Effective Date that is less than 45 days since it was donated/returned.

Tara Farquhar provided the following information with regard to the definition of contamination in the US:

Contamination occurs when at least one Telephone Number (TN) within a Thousands-Block (NPA-NXX-X) of TNs is not Available for Assignment to end users or customers.  Thousands-Blocks contaminated up to and including 10 percent are eligible for Donation/return.  For purposes of this provision, a TN is not Available for Assignment if it is classified as Administrative, Aging, Assigned, Intermediate, or reserved as defined in Federal Communications Commission (FCC) rules (47 CFR § 52.7 (h)).

The question was raised about what to do if a Carrier has had a CO Code that has been in use for 30 years in an Exchange Area, and that Carrier is losing subscribers to the point where a block should be returned (i.e., below the contamination level). In response it was noted that the block should be returned to the pool but that the numbers that are still in service should be ported to that Carrier.

Ed Antecol noted that he has created a definition for the Canadian guidelines that will be discussed further on Friday, April 19, 2024.

It was noted that not every CO Code has a unique LRN. Unless a Carrier is returning a CO Code nothing should happen to the LRN. A participant noted that the 1K block that contains the LRN is a protected block. In response it was noted that a block containing an LRN is not exactly protected but if a Carrier wants to return the block that contains an LRN, the Carrier should put the LRN into a block that they are assigning numbers out of.

One participant stated that a Carrier must have an LRN for every Exchange Area in which it operates. Another participant clarified that, functionally, a Carrier only needs one LRN per LIR or Exchange Area. It was also noted that an LIR or Exchange Area can have multiple LRNs.

It was noted that the requirement in the US is one LRN per LATA per switch. The US definition cannot be used in Canada because all of Canada is a single LATA.

It was suggested that the balance of the CSCN’s discussion address the items raised in the Teksavvy contribution.

1. Whether inclusion of unused numbers from previously assigned codes in the pool should be implemented at the same time as the initial implementation of TBP or in a subsequent phase as soon as possible thereafter;

It was noted that when TBP is opened by the CNA, it could be opened for returns at the same time as assignment and pool replenishment requests. It was suggested that block returns should not be accepted earlier than the date TBP is implemented, and that the system should be opened for everything simultaneously.

Tara Farquhar noted that the CSCN might want to refer to section 17 of the TBCOCAG for a process that could be used to get blocks of unused numbers returned. She indicated that the ability to return blocks was opened in the US prior to the processing of requests. It was also noted that the implementation process was staggered for various areas due to various regulatory actions and when subsequent Metropolitan Statistical Areas (MSAs) were added to the top 100 MSAs.

It was noted that unused numbers from previously assigned CO Codes should be donated back to the pool, assuming the blocks meet the contamination criteria.

1. Whether there should be a general cleanup or other process, or both, and whether the process(es) should be voluntary or mandatory;

It was noted that the TBP cleanup process must be mandatory. If a forecast is not done, the excess demand cannot be established. It was also noted that the specification of an “annual requirement” is restrictive. A participant noted that he believes the process must be semi-annual. In the US, semi-annual aggregate industry forecasts mean Carriers have an option to make a pool replenishment request as opposed to taking blocks from the pool if their forecasts exceed 6-months. An annual forecast will reduce the flexibility for pool replenishment.

It was noted that in the US, forecasts can be updated at any time, so demand is forecast in real time.

A participant noted that when forecasting demand, the inventory and growth forecast must be compared. It was further suggested that if a forecast is being done in 2024 and shows that in 2026 there will be demand for the numbers currently not being assigned, perhaps those numbers should not be returned to the pool.

It was noted that criteria need to be established for the return of unused blocks. Without standards, a Carrier cannot determine when blocks should be returned or retained. In the US, an Exchange Area level forecast is performed every six months. Utilization must be 75% or anything beyond the need previously forecast for a 6-month period.

The question was raised as to whether some small rural areas should be exempt from block returns as there will be no demand from other Carriers for the numbers. In response, it was noted that an ILEC could benefit from the blocks returned by some CLECs in such a situation. It was also asked whether it is possible to turn up TBP in some areas rather than others. A participant responded that there is no sense in having a blanket exemption in any area that is LNP capable.

It was noted that the implementation plan should take into consideration where the benefits of TBP will become apparent more quickly (e.g., Montreal, Toronto, Vancouver). The CNA will have the numbers to determine if some of the smaller rural markets would benefit from implementation of TBP. It was noted that TBP will not solve the demand in smaller rural markets.

1. Whether number blocks should be returned if they are not used after a specific period of time;

It was noted by the CSCN Chair, that this item seems to contain two perspectives. First, is it referring to Codes that are currently held at the time of TBP implementation or, second, is it the ones going forward that are not put in service within a defined timeline.

The question was raised as to whether the rules should be the same as those for CO Codes. It was recognized that, at some point, block return is going to create a major amount of work. Is the CSCN going to delegate a plan with phased work? If all Carriers return everything simultaneously, the workload would be overwhelming.

It was asked when the actual return process of blocks occurs if one is requesting an entire CO Code. In response, it was noted that if all the blocks are not needed, the excess blocks should be returned as soon as it is realized how many blocks are actually required. A Carrier should know what its current inventory holds and will have a forecast of demand for additional codes. Definitions need to be established and forms need to be developed so that Carriers can calculate how many blocks they require.

In the US, there is an audit process that can be invoked. It was asked, “How will that work in Canada if a Carrier is not determining their excess inventory correctly?”

It was also asked whether the CSCN or CNA should prescribe which blocks should be returned.

1. What other criteria may be relevant, such as the population or population growth of a given exchange;

It was suggested that this topic could be discussed later, although it had been touched on during the conference call.

**Contribution Development Team:**

The CSCN discussed the formation of a contribution development team to work on TIF 119. Diane Dolan, the TIF sponsor, supported this proposal and no other CSCN participant objected. Consequently, the question was asked if anyone would volunteer to work on such a team. The following people indicated they would participate.

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| 1 - Kelly T. Walsh, CNA |
| 2 - David Comrie, CNA |
| 3 - Fiona Clegg, CNA |
| 4 - Natalie Lessard, CNA |
| 5 - Stephen Walsh, CNA |
| 6 - Joey-Lynn Abdulkader, Bell Canada |
| 7 - Marie-Christine Hudon, Bell Canada |
| 8 - Leo Santoro, Bell Mobility |
| 9 - Anamika Bharti, Cogeco |
| 10 - Alex Pittman, CRTC |
| 11 - Étienne Robelin, CRTC |
| 12 - Karen Robinson, KROB Telecom Numbering Solutions |
| 13 - Michael Studniberg, Rogers Communications Inc. |
| 14 - Diane Dolan, TekSavvy Solutions Inc |

**Adjourn**

The CSCN Chair thanked Diane Dolan for the Teksavvy contribution, and the participants for attending today’s conference call.

**Summary of Agreements Reached:**

None.

**Summary of Action Items:**

1. The TIF 119 Contribution Development Team will hold a conference call on 25 April 2024, 13:00 – 15:00 ET.
2. The CNA will send out an invitation for the above-mentioned conference call. **[completed]**
3. The CNA will post an updated version of the contribution (CNCO233B), as updated today, on the CSCN drafts page of the CNA website. **[completed]**

**Attachments:**



Teksavvy Contribution - CNCO233A



Teksavvy Contribution updated by CSCN – CNCO233B