

**NPA 204 Relief Planning Committee
Conference Call
April 28, 2011**

Participants: Laurie Bowie – Bell Canada
Mark Cuccia – Interested Party
Dulari Harrichand – MTS Allstream
Lucie Pugliese – Telecommunications Alliance
Allen Trafford – MTS Allstream
Ron Fleming – MTS Allstream
Azhar Laldin – MTS Allstream
Peter Lang – Rogers Communications
Stephen Lau – MTS Allstream
Chris Holigroski – MTS Allstream
Olena Bilozerska – TELUS
Don Ruchkall - Province of Manitoba
Fiona Clegg – SAIC Canada (CNA)
Suresh Khare – SAIC Canada (CNA)
Glenn Pilley – SAIC Canada (CNA)

Welcome and Introductions:

Glenn Pilley, Chair of the NPA 204 Relief Planning Committee (RPC), welcomed the attendees and each of the participants introduced themselves. It was asked whether there were any administrative items that needed to be discussed before getting to the substance of the meeting.

Agenda:

It was noted that, while no agenda has been set for today's conference call, the objective of the call will be to review a contribution from the CNA which comprises a draft Planning Letter. In addition the Relief Planning Committee needs to discuss the options for dealing with the NPA 204 Jeopardy Condition.

February 17 Minutes & Action Items:

The minutes from the NPA 204 Relief Planning Committee conference call held on February 17, 2011 were distributed on March 3, 2011.

It was noted that no comments have been received concerning the February 17, 2011 minutes and it was asked whether the minutes could be finalized during today's conference call.

Agreement was reached to finalize the minutes from the February 17, 2011 NPA 204 Relief Planning Committee conference call.

Action Items:

- 1) Carriers should continue investigating the capabilities of the various equipment and software in networks and systems that will be impacted by NPA 204 Relief. **(Ongoing)**
- 2) It is the responsibility of individual Carriers to contact any alarm companies that are their customers in sufficient time to ensure that the transition from 7- to 10-digit local dialling is accomplished prior to 30 April 2012. **(Ongoing)**
- 3) MTS Allstream will immediately begin changing their network translations to accommodate 10-digit permissive dialling throughout Manitoba (with the possible exception of the six Exchange Areas which may have technological limitations: Shamattawa, Pukatawagan, Poplar River, Brochet, Tadoule Lake, and Lac Brochet). This activity will be completed by 1 December 2011. **(Ongoing)**

Points Noted:

Rogers Communications questioned MTS Allstream's position with respect to the 6 DMS-10 sites which may have technological limitations regarding the new area code. It was noted that MTS Allstream has discussed the situation with Commission staff and has sent a letter to Commission staff indicating that they can support 10-digit local dialling. It was also noted that if there is a legitimate request for porting of telephone numbers, then there may have to be equipment and network changes since these switches cannot support porting.

It was asked whether there was an affirmative or negative response from Commission staff concerning the 6 DMS-10 sites. In response, MTS Allstream stated that they had been informed there would not be a response from the Commission. At this time, MTS Allstream cannot implement porting in the six Exchange Areas (Shamattawa, Pukatawagan, Poplar River, Brochet, Tadoule Lake, and Lac Brochet) and will ask that two CO Codes in NPA 204 be set aside for use in these areas by other Carriers. It was also noted that there are only 1,500 subscribers across these 6 Exchange Areas.

A copy of the MTS Allstream letter to Commission staff has been attached to these minutes.

- 4) MTS Allstream will periodically inform the alarm companies, Consumer Awareness Task Force, the Network Implementation Task Force and the CNA of their progress as their switches are converted from 7- to 10-digit dialling capability. **(Ongoing)**

Points Noted:

In response to Action Item #4, it was noted that Brandon will be one of the test switches, and all changes are anticipated to be finished this month. This information will be passed on to the Consumer Awareness Task Force (Telecommunications Alliance), Network Implementation Task Force, CNA and alarm companies.

Post Meeting Note: A list of the Brandon LIR Exchange Areas that have been converted to 10-digit local dialling has been provided to the CNA, Network

Implementation Task Force and Consumer Awareness Task Force (Telecommunications Alliance). The Consumer Awareness Task Force (Telecommunications Alliance) will distribute this information to the affected alarm companies.

It was noted that a request from Stephen Lau will be sent out to Network Implementation Task Force members requesting their Progress Reports prior to the Network Implementation Task Force conference call scheduled for Thursday, May 12, 2011.

Post Meeting Note: *The Network Implementation Task Force conference call has been rescheduled to Monday, May 16, 2011 since there were changes to the call-in number and few participants were aware that the Progress Reports were to be submitted to Stephen Lau instead of Doug Birdwise, who has recently retired.*

April 7, 2011 Joint NPA 204, 250/604/778, 289/905, 416/647 & 819 Relief Planning Committee Conference Call:

It was noted that the minutes from the Joint NPA 204, 250/604/778, 289/905, 416/647 & 819 Relief Planning Committee conference call held on April 7, 2011 were distributed on April 19, 2011.

Action Item:

- 1) All Carriers must consider the options that were raised during the April 7, 2011 conference call (i.e., advance the Relief Date, change the JCP, request CRTC staff intervention) and come to today's conference call prepared to identify what action(s) should be taken to alleviate the Jeopardy Condition in NPA 204.

It was noted that regardless of the action taken by the NPA 204 Relief Planning Committee, other than leaving things status quo, Commission approval will be required.

Options for Alleviating the Jeopardy Condition in NPA 204:

Glenn Pilley detailed the results of the January 2011 NPA 204 J-NRUF and noted that there may be some discrepancies in the way data had been reported to the CNA. It was noted that in Version 1 of the J-NRUF all current and prospective CO Code Holders should have been abiding by the forecast that was submitted for the April 2009 J-NRUF. There has been some deviation from this Commission directive.

It was noted that three options had been mentioned during the April 7, 2011 Joint NPA 204, 250/604/778, 289/905, 416/647 & 819 Relief Planning Committee Conference Call, as a way of relieving the Jeopardy Condition in NPA 204 (i.e., advance the Relief Date, change the JCP, request CRTC staff intervention).

The following is a direct statement made by Ron Fleming, MTS Allstream, during the conference call:

MTS ALLSTREAM:

While we have been investigating opportunities around restructuring the MTS Allstream project, it is important to point out that any advance in the relief date would result in confusion among the people of Manitoba and to the Manitoba industry. We believe the right thing to do for all of Manitoba is to keep with the original relief date of Nov 3, 2012.

The Telecom Alliance media campaign is already well down the path of execution with clear print and radio messaging informing the people of Manitoba that on July 29, 2012, 10-digit dialing will apply to all local communications in Manitoba, paving the way for the introduction of the new 431 area code starting November 2012.

We have been meeting with customers and government officials and they are very concerned about an already short period of time to ready themselves for 10-digit dialing and the new 431 area code. Advancing the relief date creates additional challenges with increased pressure on their remediation programs.

Restructuring the MTS Allstream project would introduce additional risk to the project timeline and likely would not result in any significant advance of our completion date. We are making progress however re-planning puts our implementation plans at risk. We have just completed the Brandon Geographic Area and it is now 10-Digit Dialing compliant. We will be informing the CAFT, NITF, Telecom Alliance, and the Alarm Companies of the specific NXXs in this region which are now ready.

Again, for the reasons related to the people of Manitoba and to the Manitoba industry at large, the MTS Allstream position is we need to keep to the original relief date of Nov 3, 2012.

Impacts with advancing the relief date:

- Communications
 - Public confusion caused by changing the July 29, 2012 10-D permissive dialing date and the November 3, 2012 new 431 area code date
- Manitoba Industry and Customers (Business and Consumers)
 - Shortening the readiness period increases the challenges already being faced

Mitigation:

In keeping with the original NPA 204 Relief Date; Nov 3, 2012, MTS Allstream recommends to the Relief Planning Committee to consider the following options that were discussed on the April 7th conference call as a means of mitigating the impacts of the Sep 2012 Projected Exhaust Date:

- Release of Additional CO Codes
- 2009 Manitoba Industry CO Code Forecast and associated Jeopardy Plan
- Code Restrictions

It was noted as a result of these conclusions that MTS Allstream would like to discuss the release of additional CO Codes in NPA 204, CO Code restrictions and changes to the Jeopardy Contingency Plan as alternatives to advancing the Relief Date.

It was noted that government officials are already experiencing the pressure of the existing Relief Date and there would be an additional impact on them by advancing the timeframes. Don Ruckall, Government of Manitoba, stated that to-date relief planning has focused on the original Relief Date and any advance would create additional difficulties within the province.

It was asked whether the Winnipeg LIR has also completed its conversion to permissive 10-digit local dialling. In response it was noted that this activity would be completed in the second half of June 2011.

Peter Lang, Rogers Communications, expressed concern about the perceived hardships that MTS Allstream and consumers in Manitoba would experience if the Relief Date were advanced. He noted that the Relief Date has already been changed once to accommodate MTS Allstream. In addition, while expressing sympathy for the position of MTS Allstream, he noted that Relief Dates have been advanced in other NPAs that were in a Jeopardy Condition. In response, it was reiterated that advancing the Relief Date puts MTS Allstream and the consumers in Manitoba, including the government, at risk.

It was noted that Glenn Pilley, Director of the CNA, had spoken with Bill Mason, CRTC staff about the Jeopardy Condition in NPA 204. He noted that if current and potential Code Holders were following the provisions of Telecom Notice of Consultation 2009-309, then the Jeopardy Condition could be managed.

Glenn Pilley reminded participants that paragraphs 9 and 10 of the Notice of Consultation state:

9. The Commission considers that the PED of January 2011 does not provide sufficient time for carriers, other service providers, and some customers to implement area code relief activities such as network and customer equipment upgrades, the potential introduction of 10-digit dialing, and customer education and awareness programs. Accordingly, the Commission considers it necessary to extend the projected exhaust to a date that provides enough time to examine relief options and for all parties to make the requisite changes to their systems and equipment. The Commission considers that the projected exhaust can be extended through the use of central office (CO) code rationing measures, as outlined below.
10. The CO code rationing measures will be in place until 66 days² before the code relief is implemented. These measures will permit CO code holders in area code 204 to obtain the number of CO codes identified in their 30 April 2009 Jeopardy-Numbering Resource Utilization Forecasts (J-NRUFs) or in future J-NRUFs, the applicable J-NRUF to be determined in consultation with Commission staff, up to a maximum of 10 CO codes per year. New entrants who do not have any CO codes in area code 204 will be permitted, within the first year of entering the Manitoba market, to obtain up to 20 CO codes as identified in their J-NRUFs. Thereafter, these new entrants will be subject to the above-noted code rationing measures. The Commission believes that these measures will extend the projected exhaust to at least 1 January 2013.

Glenn Pilley summarized the results of a comparison the CNA had made between the April 2009 J-NRUF forecasts and those that were submitted in February 2011. He noted that with only a few exceptions few current or prospective CO Code Holders have exceeded the allowable number of CO Codes forecast in the April 2009 J-NRUF. It was noted that, in April 2009, the assignment of 722 CO Codes had been forecast for use by January 2011.

It was also noted that in the April 2009 J-NRUF 756 CO Codes had been forecast for use by January 2013 (using CO Code rationing).

It was noted that, based on the actual January 2011 J-NRUF forecasts (i.e., with CO Code rationing and 15 over assigned CO Codes) and by adhering to the April 2009 J-NRUF forecasts from here forward, there would actually be 29 CO Codes left over as of January 01, 2013, which is 1.5 months past the Relief Date for NPA 204.

It was noted by Glenn Pilley that, unless there is a very compelling reason, assignment of CO Codes in NPA 204 will remain at the levels forecast in April 2009. It was also noted that CO Code assignments would not be made to those companies that have been over assigned CO Codes and have therefore exceeded their April 2009 forecast quantity prior to the Relief Date. It was noted that CRTC staff will be reviewing each CO Code request for NPA 204 extremely diligently.

It was reiterated that there will be 29 CO Codes available for assignment at Commission staff's discretion prior to January 1, 2013 and it was concluded that the quantity of CO Codes remaining for assignment in NPA 204 should be sufficient to reach the Relief Date.

When asked how the CNA had reached this conclusion, it was noted that 15 NXXs had been over assigned when measured against the April 2009 J-NRUF forecast. This translates to 756 assigned/forecast CO Codes plus 15 over assigned which equal 771, leaving 29 CO Codes remaining.

It was noted that if version 2 of the January 2011 J-NRUF were used (i.e., no CO Code rationing), the current forecast would be for assignment of 897 CO Codes which includes the forecasts of the new entrants into NPA 204.

It was noted that companies are not comparing their April 2009 J-NRUF forecast to current forecasts. In response, it was noted that the CNA has a responsibility to monitor the differences between the April 2009 J-NRUF forecast and both new CO Code applications and all subsequent J-NRUF results until the Relief Date. It was also noted that all new CO Code applications will be compared to the April 2009 J-NRUF forecast.

For clarification, it was asked by a participant whether if current and prospective CO Code Holders in Manitoba followed their April 2009 J-NRUF forecasts and the 15 CO Code over assignments were taken into consideration, it would be possible not to change the Relief Date. In response, it was reiterated that there should be 29 CO Codes in excess at the time of relief, and assignment of these CO Codes prior to the Relief Date would require a very compelling reason which would need Commission staff approval.

It was noted that the Commission had not required that two versions of the J-NRUF should be completed (i.e., one with and one without CO Code restrictions). In response, it was noted that on a previous conference call the NPA 204 Relief Planning Committee had agreed that there should be two versions of the J-NRUF so that true demand would be reflected.

In response to a question it was noted that most current and prospective CO Code Holders had submitted both versions of the NPA 204 January 2011 J-NRUF. It was also noted that some companies did reduce their forecasts fractionally.

It was noted that Version 2 of the NPA 204 J-NRUF, excluding new entrants was for 867 CO Codes. Including the new entrants, the total quantity is 897 CO Codes.

It was noted that the constrained numbers for the April 2009 J-NRUF are not shown for those that did not submit them and that the data shown in the aggregate results are a

hybrid of Versions 1 and 2 of the January 2011 J-NRUF except for the brand new Carriers.

Peter Lang, Rogers Communications, submitted that the results should have shown the constrained list (i.e., April 2009 J-NRUF results with restrictions) plus the 15 over assigned CO Codes plus CO Codes that could be assigned to new entrants based on the Notice of Consultation, which would equal 771 CO Codes.

It was noted that if two new Carriers enter NPA 204, then all 29 spare CO Codes would be depleted.

It was noted that there appears to be some confusion as to how Version 1 and Version 2 of the NPA 204 J-NRUFs should be completed. In conclusion, it was noted that Version 2 could show less demand than Version 1, if current and prospective CO Code Holders were maintaining the April 2009 J-NRUF forecast in Version 1 but had seen a drop in demand and therefore did not require as many CO Codes in Version 2. It was also noted that if Version 2 contains a lower number than Version 1 of the J-NRUF then the lower number should be incorporated into Version 1, even if future forecasts take Version 1 back up to the April 2009 J-NRUF level.

It was asked if a CO Code Holder had exceeded their quota between April 2009 and now, and had no more forecast CO Codes available for assignment prior to 2013, would that mean that no more CO Code assignments would be made until the Relief Date. In response, it was noted that if a CO Code Holder has exceeded their assignment number, they would have to make a compelling argument to Commission staff to get additional CO Codes assigned to them.

In response to a question it was noted that if a CO Code Holder had forecast 10 CO Codes in 2009, and had actually been assigned 12 CO Codes with Commission sanction, then 12 CO Codes should be included in Version 1 of the J-NRUF. However, if the same CO Code Holder wanted an additional 2 CO Codes prior to relief, these should be included in Version 2 of the J-NRUF.

It was noted that the J-NRUF results are analyzed using the aggregate number of CO Code assignments, and if some companies are now forecasting below their April 2009 J-NRUF quantities, then this may offset the over assignments that were made to certain companies.

It was noted that the foreshortened Projected Exhaust Date appears to be the result of a misunderstanding concerning how the January 2011 J-NRUF forecast should have been conducted.

Questions were raised about the restrictions contained in Telecom Notice of Consultation CRTC 2009-309. It was asked whether the restrictions could be adhered to or whether the Relief Date should be moved in. MTS Allstream advocated not advancing the Relief Date.

In response to a question, it was noted that even when the Jeopardy Condition in NPA 204 was lifted, the Commission made no changes to the restrictions on CO Code assignments in that NPA.

Agreement was reached to retain the Relief Date at 3 November 2012 and adhere to the provisions of Telecom Notice of Consultation CRTC 2009-309, without adding any additional constraints to the Jeopardy Contingency Plan at this time.

NPA 431 Planning Letter:

It was noted that the CNA had created a draft Planning Letter for NPA 204/431 which is accessible from the CNA website.

It was noted that the NPA 431 Planning Letter is due to NANPA on May 5, 2011.

It was noted that MTS Allstream had submitted a request for a test CO Code in NPA 431 that was withdrawn because no Planning Letter had yet been submitted to the NANPA.

The NPA 204 Relief Planning Committee reviewed the draft Planning Letter. During this review, detailed minute taking was suspended.

Agreement was reached to accept the Planning Letter as final with the proviso that Rogers Wireless may request a revision if it is decided that they also would like to have test codes assigned.

The CNA will forward a copy of the NPA 204/431 Planning Letter to NANPA for posting to their website.

Post Meeting Note: *On May 5, 2011 the NPA 204/431 Planning Letter was sent to NANPA for posting on their website. It was posted late on May 6, 2011.*

Next Steps:

It was noted that the April 2011 J-NRUF results will be released on June 3, 2011.

It was noted that a teleconference should be held to discuss the results of the April 2011 NPA 204 J-NRUF results.

A conference call has been scheduled as follows:

Date: Tuesday, June 28, 2011
Time: 14:00 – 15:00 Eastern (13:00 – 14:00 Central)
Call In#: 1-800-366-7242
Access#: 7091039

Post Meeting Note: *The NPA 204 CATF and NITF Progress Reports are due to the Chair/Secretary of the Relief Planning Committee no later than June 2, 2011. A conference call to discuss the Progress Reports has been scheduled as follows:*

Date: Friday, June 10, 2011
Time: 14:00 – 15:00 Eastern Time
Call In#: 1-800-366-7242
Access#: 7091039

The NPA 204 RPC Chair thanked the participants for attending today's NPA 204 Relief Planning Committee conference call.

Summary of Agreements Reached:

- 1) Agreement was reached to retain the Relief Date at 3 November 2012 and adhere to the provisions of Telecom Notice of Consultation CRTC 2009-309, without adding any additional constraints to the Jeopardy Contingency Plan at this time.

Summary of Action Items:

- 1) Carriers should continue investigating the capabilities of the various equipment and software in networks and systems that will be impacted by NPA 204 Relief. **(Ongoing)**
- 2) It is the responsibility of individual Carriers to contact any alarm companies that are their customers in sufficient time to ensure that the transition from 7- to 10-digit local dialling is accomplished prior to 30 April 2012. **(Ongoing)**
- 3) MTS Allstream will immediately begin changing their network translations to accommodate 10-digit permissive dialling throughout Manitoba (with the possible exception of the six Exchange Areas which may have technological limitations: Shamattawa, Pukatawagan, Poplar River, Brochet, Tadoule Lake, and Lac Brochet). This activity will be completed by 1 December 2011. **(Ongoing)**
- 4) MTS Allstream will periodically inform the alarm companies, Consumer Awareness Task Force, the Network Implementation Task Force and the CNA of their progress as their switches are converted from 7- to 10-digit dialling capability. **(Ongoing)**
- 5) The CNA will forward a copy of the NPA 204/431 Planning Letter to NANPA for posting to their website.

Post Meeting Note: *On May 5, 2011 the NPA 204/431 Planning Letter was sent to NANPA for posting on their website. It was posted late on May 6, 2011.*



Donna Malliff
Director, Regulatory Affairs
Directeur des Affaires réglementaires
MTS Allstream Inc.

14 December 2010

Mr. Mario Bertrand
Director, Competition, Implementation and Technology
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON K1A 0N2

Dear Mr. Bertrand:

Subject: Implementation details for area code relief in Manitoba

1. Pursuant to the NPA 204 Relief Implementation Plan (RIP), as most recently approved by the Commission on 24 September 2010 in Telecom Decision 2010-711, MTS Allstream would like to provide you with additional information on two items.
2. The first item concerns the relief approach for six remote exchanges, as noted in the RIP on the bottom of page 5, and again on page A2-8:

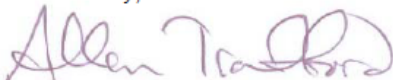
“During the development of this RIP, MTS Allstream indicated that there may be issues implementing 10-digit local dialing in six Exchange Areas in northern Manitoba that are served by DMS-10s because of technological limitations. The affected Exchange Areas are Shamattawa, Pukatawagan, Poplar River, Brochet, Tadoule Lake, Lac Brochet. MTS Allstream indicated that it will consult with Commission staff, if necessary.”
3. MTS Allstream notes that there are fewer than 1,500 NAS in total in these six exchanges. In five of these exchanges, MTS Allstream is the only service provider, and in the sixth, Shamattawa, one Wireless Service Provider (WSP) operates, however that WSP has not requested inter-modal number portability with MTS Allstream.
4. MTS Allstream has completed its assessment of relief options for these areas, and has determined that it is practical to implement 10-digit local dialing on the same schedule as for the rest of Manitoba. Further, to facilitate possible wireless service, MTS Allstream

Mr. Mario Bertrand
14 December 2010
Page 2 of 2

proposes that two NXX codes within NPA 204 be set aside for potential use for WSP entry without portability.

5. In the extremely unlikely event of a *bona fide* request by a WSP or CLEC for number portability in one of these exchanges, MTS Allstream requests that such a request be held until after implementation of NPA 431, and that MTS Allstream then be given a period of at least twelve months to assess, plan and carry out the necessary equipment upgrades and replacements. This period is necessary in light of the fact that there is no year-round road access to any of these locations (for example, the most southerly of these exchanges, Poplar River, is generally accessible by road only from January through March). MTS Allstream estimates upgrade and replacement costs of \$300K for each of these exchanges.
6. The second item concerns the text of recorded announcements to other carriers during testing, and to customers advising of, and then requiring, 10-digit dialing. MTS Allstream notes that the RIP shows the announcements with wording in both English and French as an inadvertent result of the RIP for NPA 204 being adapted from a previous RIP. Approved RIPs for NPAs 250 / 403 / 780 and 289 / 905 contained no French wording or requirement to provide bilingual announcements¹. Further, MTS Allstream has never provided standard bilingual recorded messages either for customers or for other carriers. Therefore MTS Allstream confirms that it will only use the English wording provided in the RIP for these announcements.

Yours truly,



for Donna Malliff
Director, Regulatory Affairs

c.c: Allen Trafford, MTS Allstream, 613-688-8794
Bill Mason, CRTC
Glenn Pilley, Canadian Numbering Administration

*** End of Document ***

¹ These RIPs were approved in Telecom Decisions CRTC 2007-83 and 2010-481.