

**NPA 204 Relief Planning Committee  
Conference Call  
May 3, 2010**

**Participants:** Doug Birdwise – Bell Canada  
Bill Mason – CRTC  
Bill Barsley – TELUS  
Leslie Bester – Les.Net  
Teresa Goraluk – MTS Allstream  
Bob Lantz – MTS Allstream  
Kevin Broadfoot – MTS Allstream  
Esther Snow – Shaw Cable  
Peter Lang – Rogers Communications Inc.  
Russell Ochocki – Provincial Tel  
Allen Trafford – MTS Allstream  
Rob Bazilewich - Westman Communications Group  
David McKeown – Westman Communications Group  
Dave Sheedy – MTS Allstream  
Olena Bilozerska - TELUS  
Fiona Clegg – SAIC Canada (CNA)  
Suresh Khare – SAIC Canada (CNA)  
Glenn Pilley – SAIC Canada (CNA)

**Welcome and Introductions:**

Glenn Pilley 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.

**April 13, 2010 Minutes & Action Items:**

The minutes from the NPA 204 Relief Planning Committee conference call held on April 13, 2010 were distributed on April 21, 2010.

It was asked whether the minutes could be finalized during today's conference call.

Agreement was reached to accept the NPA 204 Relief Planning Committee April 13, 2010 conference call minutes as written.

**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) MTS Allstream did go to their executive and let the CNA know that the results were not conclusive regarding an alternative proposed relief date.

- 3) The CNA asked CRTC staff to attend today's NPA 204 Relief Planning Committee conference call.
- 4) Esther Snow will provide the CNA or the co-chairs of the Consumer Awareness and Network Implementation Task Forces with contact information for the representatives from Shaw Cable.

It was noted that Esther had contacted Stephen Lau with the NITF representative, but not with the CATF representative.

- 5) On April 20, 2010 the CNA sent out an e-mail message to all Relief Planning Committee and CSCN members requesting other Carriers to join the Task Forces. The contact information for Chris Holigroski (Consumer Awareness Task Force) and Stephen Lau (Network Implementation Task Force) is [chris.holigroski@mtsallstream.com](mailto:chris.holigroski@mtsallstream.com) and [stephen.lau@mtsallstream.com](mailto:stephen.lau@mtsallstream.com).
- 6) Volunteers for additional co-chairs for the Consumer Awareness and Network Implementation Task Forces are requested. **(Ongoing)**

#### **Agenda:**

It was noted that, while no agenda has been set for today's conference call, the objectives of the call will be:

- MTS Allstream should establish a potential Relief Date. The date should ideally be no less than 6 months prior to the Projected Exhaust Date
- Review contribution from Westman Communications Group
- Finalize the Planning Document & TIF Report
- Review the Bell Canada Proposed Relief Implementation Plan contribution

#### **Establishment of Potential Relief Date:**

It was asked whether MTS Allstream has been able to establish a potential Relief Date. In response, it was noted that MTS Allstream is taking the situation very seriously and would like to propose a Relief Date of November 2012.

A statement concerning MTS Allstream's position was read out by Dave Sheedy of MTS Allstream. A copy of the statement will be attached to these minutes.

It was noted that Bell Canada (CLEC) will support the suggested November 2012 Relief Date.

It was noted that, due to the Christmas brown-out period, the Relief Date should be late October or early November 2012 to avoid any disruption to the network. It was suggested that the Relief Date be November 3, since November 10 is one day prior to Remembrance Day and there could be some difficulties if certain participants were to take that day off.

It was asked how Commission staff would react to moving the proposed Relief Date to November 3, 2012. In response, Commission staff noted that, under the circumstances,

compressing the period between the Relief Date and the Projected Exhaust Date is acceptable.

It was noted that there have been some discussions about possible rate center consolidation in northern Manitoba as there are so few customers in that area. It was noted that this was an informal discussion and no contributions on this topic have been received.

It was asked whether any existing bilateral number sharing schemes that are in place would remain in place during the six month period extension to the Relief Date. In response, it was noted that none of the bilateral number sharing schemes have been implemented as yet. However, if the implementation of number sharing schemes were to push the Projected Exhaust Date out by a considerable amount of time, then it might be possible to submit a new Relief Implementation Plan to accommodate the new Projected Exhaust Date.

**Contribution from Westman Communications Group:**

It was noted that a contribution dated April 30, 2010 had been distributed to NPA 204 Relief Planning Committee participants on the morning of May 3, 2010. It was also noted that a copy of the contribution has been posted to the CNA website at: [http://www.cnac.ca/npa\\_codes/relief/204/relief\\_204.htm](http://www.cnac.ca/npa_codes/relief/204/relief_204.htm).

Rob Bazilewicz of Westman Communications Group presented the contribution. The purpose of this contribution is to identify additional options for NPA 204 relief in Manitoba. To push out the Relief Date, Westman recommends considering the implementation of number pooling for Manitoba or, alternatively, MTS Allstream could relinquish 100-blocks of numbers to a neutral third party; specifically, the CNA. These blocks would no longer remain under the control of MTS Allstream but would be available from the neutral third party to LECs that do not require a full NXX to serve an Exchange Area.

It was suggested that a trial mechanism might be put into place with respect to a type of number pooling. It was also noted that Westman Communications Group believes all of the Carriers owe it to their customers to consider all options for deferring implementation of 10-digit local dialling and the introduction of a new NPA as number utilization is not being optimized.

In response, it was noted that implementation of some form of number pooling would be very expensive for the Canadian telecommunications industry. It was also noted that some form of number pooling would need Commission input, and probably would have to be put to Public Notice by the Commission. It was noted that a majority of the decisions that would have to be made if a number pooling scheme were adopted would also involve significant changes to the "Canadian" NPAC.

Rogers Communications Inc. and Bell Canada both expressed concern about the costs of implementing some form of number pooling in Canada. In addition, both companies believe that number pooling is beyond the scope of providing relief for NPA 204 and would require a totally different Commission proceeding to implement.

It was noted that there is also a proposal from Westman Communications Group that 100-blocks of numbers could be administered by a neutral third party. It was suggested that this could be looked at as a model and would provide some relief for NPA 204. It was noted that there is a significant difference between number pooling and CO Code sharing.

MTS Allstream noted that they are not prepared to address number pooling at this time, but are amenable to some kind of CO Code sharing arrangement.

It was suggested that the CNA could administer the 100-blocks even under a CO Code sharing arrangement. In response, it was noted that there would be some cost attached if the CNA were to administer number blocks. MTS Allstream also noted that they are prepared to and are capable of administering 100-blocks under a Code Sharing arrangement. In actuality, MTS Allstream administering 100-blocks would incur very little cost to other Carriers.

It was asked whether merely implementing 10-digit local dialling in NPA 204 would provide some leeway for the Relief Date. In response, it was noted that there are not that many Protected CO Codes in Manitoba and making them available for assignment would have no significant impact on the Relief Date.

It was noted that MTS Allstream has already negotiated CO Code sharing with one company, but is not sure whether they should aggressively go after other CLECs and WSPs to implement CO Code sharing. MTS Allstream indicated that they might be able to provide 100-blocks or thousands blocks to other Carriers.

In response to a question about the CNA's ability to administer 100-blocks, the CNA noted that another database, and possibly significant changes to existing databases, would have to be set up for 100-block administration. These additional activities would have to be funded by the CNAC. It was noted that the CNAC funding mechanism may have to be reviewed if 100-block administration for Manitoba was undertaken by the CNA. Furthermore a bidding process may have to be initiated for a neutral third-party administrator. Any one of these factors could prove to be time consuming.

It was noted that the cost of establishing a neutral third-party administrator has to be offset against the costs that would be incurred by customers if 10-digit local dialling were implemented (e.g., changing business cards, lettering on panel trucks, letterhead, etc.).

It was noted that the Exchange Area distribution in Manitoba is very diverse in terms of the number of customers in certain areas. There are about 17 Exchange Areas where the NAS is high. Many of the other Exchange Areas have less than 1000 customers in an Exchange Area and the assignment of number blocks would extend the Relief Date out beyond May 2013. It was noted that there are some social advantages to over 90 percent of the communities in Manitoba if 7-digit dialling were retained.

It was noted that not using at least 40 NXXs out of the current NRUF would move the Relief Date out by one year and would make it worthwhile to submit another Relief Implementation Plan to the Commission.

In response to a question, it was noted that CO Code sharing would gain a couple of extra years with respect to the Relief Date. It was reiterated that MTS Allstream's preference is for bilateral arrangements with other Carriers.

It was noted that it is critical to establish a readiness date, even if a year from now, the Relief Planning Committee is in a position to request deferral of the Relief Date.

It was noted that if the Projected Exhaust Date moves out significantly, then the Relief Planning Committee could agree to submit an updated Relief Implementation Plan. It was also noted that this has been done in the past in other relief planning initiatives.

It was noted that Westman is recommending alternatives and when the NRUFs are next completed it was suggested that the alternatives be taken into consideration which may move the Projected Exhaust Date out.

It was noted that it is important to establish the Relief Method and the new NPA, by sending a Planning Document and Relief Implementation Plan in to the Commission. Even if the Relief Date moves back, it was reiterated that the Relief Planning Committee could submit another Relief Implementation Plan to the Commission.

It was noted that the second alternative provided by Westman appears to be feasible and should be discussed further in the NPA 204 Relief Planning Committee meetings.

Bell Canada noted that the CNA is capable of administering pooling arrangements, but there are many other factors that need to be taken into consideration by the industry.

It was noted that any arrangement with a third party administrator would be considered number pooling. If MTS Allstream were to manage the 100-blocks, then it would be considered CO Code sharing.

It was noted that some costing on 100-block administration would be required if the Relief Planning Committee is even going to consider this as an option for extending the life of NPA 204.

It was noted that Bell Canada has been waiting since last summer for a recommendation with respect to a Relief Method and the new NPA and supports submitting a Planning Document and Relief Implementation Plan at this time.

It was noted that the Relief Planning Committee has already agreed to recommend that 431 be the new NPA. In response, Bell Canada noted that the agreement is not the same as a Commission decision.

It was noted that the Commission cannot make any decisions without having the Planning Document and Relief Implementation Plan submitted to them. It was also noted that some companies are anxious to get a decision from the Commission as soon as possible.

In response to a question, the CNA noted that NPA 204 will be declared in a Jeopardy Condition on May 5, 2010.

A representative from MTS Allstream noted that there is some comfort in knowing the Relief Date could be moved out if circumstances change significantly over the next few NRUF periods.

It was noted that the other processes could be undertaken in parallel with the other activities of the Relief Planning Committee; however, getting a decision from the Commission is becoming imperative.

It was noted that CLECs or WSPs have as much right to have NXXs assigned to them as the ILEC and, if a number of new CLECs or WSPs enter the market, there are no guarantees that a plan for number pooling or CO Code sharing will have any material effect on the forecast. MTS Allstream is prepared to continue trying to conduct bilateral negotiations to institute CO Code sharing.

It was noted by Shaw Cable and TELUS that they cannot support 100-block number pooling, as they would need larger blocks of numbers assigned to them. It was noted that number pooling would not materially affect their forecasts. In response, it was noted that accommodation could be made for different sized blocks.

It was asked whether the Westman contribution is recommending that the Commission mandate some form of number pooling. In response, it was noted that the contribution is a high level proposal to get some other options for NPA 204 relief on the table.

It was suggested that there should be future discussions about how an option could be introduced that would give customers time to get used to 10-digit local dialling and the introduction of a new area code.

It was asked whether the Commission would mandate that CLECs have to accept numbers in hundreds or thousands blocks. The staff opinion was that if there is a bilateral CO Code sharing agreement, there would be no problem but disadvantaging newer competitors from the established ones by limiting the quantity of numbers available to them is a decision that CRTC staff cannot make without a public process.

It was noted that at this time bilateral agreements are the recommended route, as opposed to having a third party administrator. It was noted that the process that has been outlined by Westman perhaps should not be addressed by the RPC, but could be addressed by another CISC working group.

It was noted that if anything could be done to preserve 40 extra CO Codes thereby moving the Relief Date out by one year, then it would be beneficial. It was also noted that a direction has to be established and discussions concerning how to defer the Relief Date can wait until after submission of the Planning Document and Relief Implementation Plan to the Commission. If these documents are not submitted to the Commission, then no one will be able to move forward with implementing 10-digit local dialling and introduction of the new NPA.

Bell Canada noted that section 11 of the draft Planning Document states:

In the event that the Projected Exhaust Date is advanced or delayed by greater than six months, the RPC recommends that the CNA advise the RPC of the change and immediately convene a conference call of the

RPC to discuss and address the matter. The RPC shall conduct an assessment of whether any changes should be made to the Relief Implementation Plan and Schedule (e.g., changes in tasks, events, and dates including the Relief Date) and, if agreed, submit recommendations to the CRTC for consideration and approval.

It was noted that the Westman contribution had not be submitted early enough for anyone to make any decisions today on the proposals contained in the contribution.

It was noted by several participants that the suggestions made in the Westman contribution are beyond the scope of the Relief Planning Committee's mandate.

It was noted by Rogers Communications Inc. that number pooling is beyond the scope of the CISC. It was noted that policy issues are beyond the scope of the CISC and CRTC staff confirmed that number pooling is a policy issue. It was suggested that Westman talk to Commission staff off-line and find out how to approach this issue.

It was noted that rate center consolidation issues would have to be looked at by the ILEC and it would take some time to implement because of re-writing tariffs. It was asked what desire there is on the part of existing CLECs/WSPs in Manitoba to implement CO Code sharing as it would likely be a faster method of delaying relief than rate center consolidation.

Agreement was reached to accept November 3, 2012 as the Relief Date to be recommended in the NPA 204 Planning Document and Relief Implementation Plan to be sent to the Commission.

Some discussion took place as to whether the 7- to 10-digit dialling transition period should be two or three months. It was noted that in some cases the conversion has taken place in two months and in other cases three. It was noted that when 10-digit local dialling was first introduced in other NPAs, the Commission appeared to favour a three month transition period. It was suggested that, since this is the first time customers in NPA 204 will be exposed to 10-digit local dialling, the 7- to 10-digit transition period should probably be three months.

It was noted that now an agreement has been reached on the Relief Date, the Proposed Relief Implementation Schedule needs to be updated. Doug Birdwise volunteered to submit a Proposed Relief Implementation Schedule as a contribution.

**Next Steps:**

Conference calls have been scheduled as follows:

- Thursday, May 13, 2010 14:00 – 17:00 Eastern Time (13:00 – 16:00 Central Time)
- Tuesday, May 25, 2010 14:00 – 16:00 Eastern Time (13:00 – 15:00 Central Time)

The call in number for these conference calls will be 1-800-366-7242 and the access number will be 7091039#.

The objectives of these Relief Planning Committee conference calls will be to:

- Finalize the Planning Document & TIF Report
- Review the Bell Canada Proposed Relief Implementation Plan contribution

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 accept the NPA 204 Relief Planning Committee April 13, 2010 conference call minutes as written.
- 2) Agreement was reached to accept November 3, 2012 as the Relief Date to be recommended in the NPA 204 Planning Document and Relief Implementation Plan to be sent to the Commission.

**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) Will contact the CNA and Chris Holigroski with contact information for the CATF representative from Shaw Cable.
- 3) Volunteers for additional co-chairs for the Consumer Awareness and Network Implementation Task Forces are requested. **(Ongoing)**
- 4) Dave Sheedy will send a copy of the statement concerning MTS Allstream's position concerning the proposed Relief Date. A copy of the statement will be attached to these minutes.
- 5) Doug Birdwise will submit an updated NPA 204 Proposed Relief Implementation Schedule which accommodates the November 3, 2012 Relief Date.

Attachment – MTS Allstream Statement

**MTS understands and acknowledges the current CNA forecast that an NPA 431 overlay solution is required to address the NPA exhaust in May 2013. As the normal planning cycle for NPA exhaust has been compressed from six to three years, MTS is respectfully requesting approval from NPA Relief Planning Committee to extend the ready date to November 2012. MTS is finalizing our internal plans to meet the forecasted deadline while the RPC should continue activities per the proposed schedule as amended.**