**CRTC INTERCONNECTION STEERING COMMITTEE**

**TIF REPORT**

**Date Submitted:                xx September 2020**

**WORKING GROUP: NPA 709 RPC**

**REPORT #:     NPA 709 TIF Report #4                                    File ID: 709RE04A**

**REPORT TITLE**: Deferral of relief date for NPA 709

**OUTCOME: CONSENSUS**

**RELATED TASK(s) #: 709RE03**

**BACKGROUND:**

On 2 February 2017 the CRTC released Telecom Decision CRTC 2017-35, *Area code relief for area code 709 in Newfoundland and Labrador*. In that Decision, the Commission approved the Relief Implementation Plan developed by the CISC NPA 709 ad hoc Relief Planning Committee (RPC), and submitted to the CRTC on 11 October 2016. The Commission also determined that NPA relief would be provided by implementing a Distributed Overlay of new area code 879, effective 24 November 2018.

Subsequently, on 5 September 2017, the Canadian Numbering Administrator informed CRTC staff and the NPA 709 RPC that, based on the results of the most recent Jeopardy Numbering Resource Utilization Forecast, the Projected Exhaust Date had moved out to the first quarter of 2024. Based on this announcement, Bell Canada submitted a contribution to the RPC, dated 6 October 2017, in which the company requested deferral of the relief implementation date from 24 November 2018 to 20 May 2022.

The contribution precipitated non-consensus in the NPA 709 RPC concerning the Relief Date, and the CISC dispute resolution process was invoked.

In Telecom Decision CRTC 2018-59, *CRTC Interconnection Steering Committee – Dispute regarding deferral of the relief implementation date for area code 709 in Newfoundland and Labrador*, dated 14 February 2018, the Commission found that the relief implementation date for area code 709 should be deferred and requested that “the RPC recommend an appropriate relief implementation date, taking into consideration the results of upcoming semi-annual area code 709 relief numbering resource utilization reports.”

On 16 May 2018, the RPC submitted to the Commission a revised Relief Implementation Plan, including a revised relief implementation schedule. In its plan, the RPC noted that, based on the January 2018 area code 709 relief NRUF results, area code 709 was projected to exhaust in April 2023. The RPC therefore proposed that the revised Relief Date should be 20 May 2022.

In Telecom Decision CRTC 2018-333, *Revised relief implementation plan for area code 709 in Newfoundland and Labrador*, the Commission approved the revised RIP for area code 709 in Newfoundland and Labrador, with a Relief Date of 20 May 2022.

On 24 March 2020, the CNA released the results of the January 2020 R-NRUF, which indicated that the PED for NPA 709 had been further delayed to March 2024.

On 26 June 2020, the RPC submitted to the Commission TIF Report 709RE03A, proposing a deferral of the Relief Date until 27 May 2023 based upon the January 2020 R-NRUF results which forecast a March 2024 Projected Exhaust Date. The TIF Report included a revised Relief Implementation Plan, and revised relief implementation schedule. A Telecom Decision is pending on these recommendations.

On 18 August 2020, the CNA released the results of the July 2020 R-NRUF, which indicated that the Projected Exhaust Date for NPA 709 had been delayed by 51 months to June 2028. This is currently outside of the Relief Planning Window.

Due to the delayed Projected Exhaust Date, Bell Canada submitted a contribution on 18 August 2020 which proposed deferring the Relief Date indefinitely.

**FACTORS:**

**Excerpt from the CNA Update on NPA Relief Planning Activities**

Summary of NPA 709 Projected Exhaust Dates

| **Type of C-NRUF** | **Projected Exhaust Date** |
| --- | --- |
| G-NRUF January 2015 | August 2024 |
| G-NRUF January 2016 | May 2019 |
| J-NRUF April 2016 – based on revised TSP input and iaw Telecom Notice of Consultation CRTC 2016‑205 | March 2019 |
| J-NRUF July 2016 | March 2019 |
| J-NRUF October 2016 | March 2019 |
| J-NRUF January 2017 | August 2019 |
| J-NRUF April 2017 | August 2019 |
| J-NRUF July 2017 | March 2024 |
| R-NRUF January 2018 | April 2023 |
| R-NRUF July 2018 | March 2023 |
| R-NRUF January 2019 | August 2023 |
| R-NRUF July 2019 | Oct 2023 |
| January 2020 R-NRUF | March 2024 |
| January 2020 R-NRUF (modified with new carrier forecasts) | February 2024 |
| July 2020 R-NRUF | June 2028 |

**ALTERNATIVES:**

**N/A**

**ANALYSIS:**

The approved Relief Date of 20 May 2022 is 6 years in advance of the Projected Exhaust Date, while the recommended Relief Date of 27 May 2023 is 5 years in advance of the Projected Exhaust Date. The RPC proposes to defer the relief implementation date and halt NPA Relief activity in the NPA.

This deferral is a significant change over the previous forecast and, as a result, there is some question as to the validity of both the current and previous forecast. The RPC therefore proposes that Relief Planning and R-NRUFs be suspended indefinitely. The RPC further proposes that, Relief Planning and R-NRUFs should resume once the NPA re-enters the Planning Window.

As TIF Report 709RE03A requesting a deferral of this NPA to 2023 is currently before the CRTC, The RPC proposes that the recommendations be moved as quickly as possible through the CISC process.

**CONCLUSIONS:**

**The Relief Implementation Plan needs to be revised based on the preceding analysis.**

**RECOMMENDATIONS:**

**The RPC recommends that:**

1. the Relief Date for NPA 709 be deferred indefinitely at this time;
2. the RPC reconvene once the NPA re-enters the Planning Window; and
3. any recommendations be moved through the CISC process in an expedited manner as the CRTC is already considering TIF Report 709RE03A which recommends Relief be postponed until 2023.

**ATTACHMENTS:**

N/A