

Canadian Steering Committee on Numbering

Date: 2 March 2026

FILED ELECTRONICALLY

To: Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
K1A 0N2

ATTN: Marc Morin

Subject: Request for extension — CSCN TIF 126 report on updates to auditing (Appendix A of the Canadian CO Code Assignment Guideline)

Dear Sir,

On 5 February 2024, [Telecom Regulatory Policy CRTC 2024-26](#) set out the Commission's determinations to implement Thousands-Block Pooling (TBP) in Canada and requested that the CRTC Interconnection Steering Committee (CISC), through the Canadian Steering Committee on Numbering (CSCN), develop recommendations to strengthen number assignment measures with a focus on preserving geographic NANP numbering resources during and after TBP implementation. In response, on 11 July 2024, the CSCN filed consensus report [CNRE144B \(CSCN Response to Telecom Regulatory Policy 2024-26, paragraph 51\)](#). In CNRE144B, the CSCN noted that the audit provisions in Appendix A – Audits of the Central Office Code (NXX) Assignment Guideline should be revisited following the Commission's determination on CNRE144B.

On 26 September 2025, the Commission issued [Telecom Decision CRTC 2025-252](#) approving the recommendations in CNRE144B. In that Decision, the Commission requested that the CSCN file, within six months, a report containing recommendations to update "Appendix A – Audits" to reflect new number-usage reporting requirements and to identify factors for the Commission's consideration, including factors for which specific recommendations may fall outside the CSCN's mandate. The filing deadline is 26 March 2026.

In considering the scope of the requested Appendix A work and the above deadline, the CSCN notes the following:

- 1) TBP implementation remains the primary near-term priority for the industry and the CSCN.** Industry participants (including the subject-matter experts who contribute to CSCN deliverables) are actively preparing, testing, and planning for TBP's phased implementation. The Commission's subsequent determinations in [Telecom Decision CRTC 2025-321](#) modifying the deadline for TBP further underscore the ongoing work required to advance TBP implementation in accordance with Commission direction. In para 37(a), the Commission requests that the CSCN develop a schedule for the phased-in implementation seeing the first Exchange Area implemented by 28 July 2026 and the final Exchange Area implemented by 28 July 2027. In para 37(b), it directed all LECs and wireless carriers to actively participate in developing the Exchange Area implementation timeline under the leadership of CSCN.

Canadian Steering Committee on Numbering

- 2) **The new number-usage reporting measures and associated processes are still in their early stages.** The audit framework contemplated in Appendix A is intended to support scrutiny, escalation, and (where appropriate) Commission consideration of number requests and utilization. The new NRUF and utilization reporting regime directive adopted in Telecom Decision CRTC 2025-252 is conducted semi-annually (January and July) and is currently in the middle of conducting the second compilation of NRUF and Utilization results. Meaningful recommendations about possible verification triggers, thresholds, and procedures would benefit from additional NRUF/utilization reporting cycles under this updated reporting regime, so that the CSCN (and the CNA) can establish baselines, identify reliable indicators of anomalies, and better assess what escalation criteria might be practical, proportionate, and effective.
- 3) **An informed update to Appendix A requires sufficient operational experience under TBP.** The CSCN considers that updates to the audit framework should be practical, proportionate and grounded in early TBP implementation experience together with the emerging evidence from the new NRUF/utilization reporting measures. This will better support the Commission's objective of enhanced number preservation and management within the TBP context.
- 4) **The urgency for updating the Appendix A framework is low.** The CSCN is unaware of an audit ever being conducted using the provisions of Appendix A.

In light of the above, the CSCN respectfully requests an extension of the filing deadline from 26 March 2026 to **26 March 2027** for the CSCN TIF 126 report on Appendix A – Audits. This extension would allow for a more operationally grounded and data-informed report that appropriately reflects both (i) the TBP implementation experience and (ii) the maturation of the updated NRUF/utilization reporting measures and related processes.

Sincerely,

Sent via email by

Kelly T. Walsh
Chair
Canadian Steering Committee on Numbering

c.c. Suneil Kanjeekal, CRTC staff
Étienne Robelin, CRTC staff
Alexander Pittman, CRTC staff