**CRTC INTERCONNECTION STEERING COMMITTEE**

**CANADIAN STEERING COMMITTEE ON NUMBERING (CSCN)**

**DISPUTE INFORMATION FORM**

**Date of Submission: 10 November 2017 Dispute ID #:** CNDI001.docx

**Referenced Task #:**

**Originator(s): Bell Canada**

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**Dispute Title: NPA Relief Planning (709 NL) Relief Date Change – Bell Canada Reply to Rogers' Comments dated 30 October 2017.**

**Dispute Description: Modify Implementation Date of NPA 879 in relief of NPA 709 (NL)**

**Priority:**

**Tasks with Cross-impacts:**

**Background:**

**In Decision 2010-784**[[1]](#footnote-1)**, the Commission set aside area code 879 for future NPA relief in area code 709. On** 22 April 2016, the Canadian Numbering Administrator (CNA) informed the Commission that based on the 2016 G-NRUF results, NPA 709 in Newfoundland and Labrador (NL) was within the six-year window for NPA relief with a Projected Exhaust Date (PED) of May 2019.

The Commission issued TNC 2016-205[[2]](#footnote-2) on 31 May 2016, in which it established a Relief Planning Committee (RPC) to examine options for providing relief to NPA 709. The RPC developed a Relief Implementation Plan (RIP), based on the PED of May 2019 for NPA 709, and submitted it to the Commission on 11 October 2016. The Commission approved the RIP in
Decision 2017-35[[3]](#footnote-3).

The CNA, on 5 September 2017, suspended the Jeopardy condition in NPA 709 as the results of the July 2017 J-NRUF report showed that there was no longer a Jeopardy Condition for NPA 709 and the PED is now forecasted to be 1Q 2024, almost five years beyond the date it was initially expected (May 2019).

With the PED for NPA 709 not expected until Q1 2024, Bell Canada, on 6 October 2017, submitted a revised RIP proposing to defer the implementation date to 20 May 2022 for the following reasons:

"A delay to the relief implementation date would defer the need for any immediate dial plan changes in accordance with the Distributed Overlay. This would result in less customer confusion and allow more time for consumers and businesses to prepare for the inevitable 7D to 10 D local dial plan change. Consumers would also benefit from the delay as they would be able to defer costs associated with equipment changes that could be required as a result of the Distributed Overlay. TSP’s would also benefit from a delay in the relief date as they would be able to defer network and communication costs associated with this relief effort by nearly 4 years."

Since Bell Canada's proposed RIP was submitted, Rogers has filed comments dated 30 October 2017 opposing Bell Canada's proposal. Specifically, Rogers argues that the public awareness campaign has already started and postponing the dates will cause customer confusion and Rogers is concerned that costs have already been incurred to update their telecom systems.

In the following paragraphs, we will address Rogers' comments and provide our rationale why requesting a delay in the implementation date for NPA 709 is appropriate.

**Website and system IT development**

Rogers states that it has already incurred costs to update its websites and other documents and back office system IT development has occurred in preparation for 10-digit dialing. Further, some end-users may have already started to modify their systems (PBX or alarm systems). Rogers is of the view that since the costs have already started to be incurred, the relief implementation should not be delayed.

In our view, there is still a significant amount of work to be done. By delaying the implementation date, nothing is lost, costs will still have to be incurred eventually; however, incurring further costs at this time is not necessary. As an ILEC, we have hundreds of systems and network elements such as switches in 211 exchanges that need to be updated, while CLECs typically only have a single switch with little other changes to implement. The network costs are much more significant for the ILECs than other carrier's costs which pale in comparison. Given that area code 709 does not actually require relief at this time and the PED is now slated for 2024, Bell is proposing that the relief date be postponed in order to save on the investment. The relief implementation guidelines are available for a reason; relief projects typically start six years in advance – here we are seven years in advance. It is wasteful to move ahead because there are a few steps completed in the relief implementation plan when no relief is actually necessary at this time.

Our request is not unprecedented. The following is an example where the Commission pushed out a date even though it had already rendered its Decision. The Commission, in
Decision 2014-88[[4]](#footnote-4), approved the RIP for NPA 519 with a relief date of 4 June 2015. The CNA on 25 April 2014 released its R-NRUF report which indicated the PED had been moved out to  May 2018, which was almost three years beyond the relief date of 4 June 2015. Therefore, the RPC recommended that the relief date be deferred by one year in accordance with Section 4.6 g) of the NPA Relief Planning Guidelines[[5]](#footnote-5) The Commission, in Decision 2014-338[[6]](#footnote-6), approved the RPC recommendation and deferred the relief date by one year to 4 June 2016. This shows that even after the Commission has rendered a decision it can, and has in the past, adapted to changes in the industry with respect to usage of numbering resources.

**Public awareness campaign and customer communications**

Rogers argues that the public awareness campaign as already begun, various customer communications have been sent (i.e., bill messages, and text messages) and postponing the dates will likely cause customer confusion and could increase call center volumes. As result, Rogers opposes delaying the relief implementation.

The NPA relief communications campaign ran from February to May 2017. This was the first phase of the campaign which focused on creating awareness about the new area code and 10-digit dialing amongst consumers and businesses.

The second phase of the campaign is scheduled to start in March 2018 to encourage customers to get ready for 10-digit dialing and start programming their equipment for 10-digit dialing.

In our view, while the public awareness campaign is underway, a further communication informing users that they have more time for a transition is unlikely to be ill received or confusing. With the PED being pushed out by five years it only makes sense to postpone any further relief efforts at this time. Implementation from a user perspective is still over a year away. Further, consumers and Special users (9-1-1 public safety answering points (PSAPs), alarm companies, ISPs, paging companies, etc.) who have not already begun implementing changes to their telecom equipment and systems, will be able to save on capital expenses required to facilitate this change. Instead, they will be able to re-allocate funds that would have been earmarked for legacy equipment upgrades associated with the industry mandated dial plan change.

**Conclusion**

For the reasons explained above, we do not believe that Rogers’ supporting arguments not to defer the relief implementation are sufficient to justify moving forward with the relief plan as it is. The July 2017 J-NRUF report showed that there was no longer a Jeopardy Condition for NPA 709 and the PED is now forecasted to be 1Q 2024, almost five years beyond the date it was initially expected (May 2019). The costs incurred to date are small compared to the costs that still need to be incurred if we are to move forward with a relief plan that is not necessary at this time. Further, while the communication piece for the first phase of the public awareness campaign has been sent it is a small portion of the process. With clear messaging a further communication informing users that they have more time for a transition is unlikely to be ill received or confusing.

The Commission has, in the past, suspended a RIP due to a change in PED within tighter deadlines. Given the PED for area code 709 has been pushed back by five years, relief is no longer necessary at this time and should be postponed to 2022. Proceeding now with a relief plan that is not necessary is wasteful, the deferral is appropriate and consistent with the relief guidelines. Therefore, Bell maintains its position that deferring the relief implementation plan remains the most appropriate.

1. Telecom Decision CRTC 2010-784, *CRTC Interconnection Steering Committee consensus item – Reservation of area codes for future area code relief*. [↑](#footnote-ref-1)
2. Telecom Notice of Consultation CRTC 2016-205*, Establishment of a CISC ad hoc committee for relief planning for area code 709 in Newfoundland and Labrador.* [↑](#footnote-ref-2)
3. Telecom Decision CRTC 2017-35, *Area code relief for area code 709 in Newfoundland and Labrador*. [↑](#footnote-ref-3)
4. Telecom Decision CRTC 2014-88, *Updated relief implementation plan for area codes 226 and 519 in southwestern Ontario*  [↑](#footnote-ref-4)
5. The Canadian NPA Relief Planning Guidelines Section 4.6g states: If the Projected Exhaust Date has been approved by the CRTC, or if other reasons suggest that a change in the Relief Date is desirable, then the RPC may recommend that the CRTC change the Relief Date. [↑](#footnote-ref-5)
6. Telecom Decision CRTC 2014-338, *Area code relief for area codes 226 and 519 in southwestern Ontario*. [↑](#footnote-ref-6)