**21 February 2024**

**Minutes from CSCN 128**

**In-person/Conference Call**

**Hosted by CRTC**

**In-Person:** David Comrie - COMsolve Inc. (CNA)

Fiona Clegg - COMsolve Inc. (CNA)

Kelly T. Walsh - COMsolve Inc. (CNA)

Natalie Ann Lessard - COMsolve Inc. (CNA)

Alexander Pittman - CRTC staff

Diane Dolan - Teksavvy

Étienne Robelin - CRTC staff

Jean-Michel Dupuis - Rogers

Joey-Lynn Abdulkader - Bell Canada

Karen Robinson - Interested Party

Marcel Champagne - Neustar

Martin Laroche - TELUS

Michel Murray - CRTC staff

**Conference Bridge:** Connie Hartman - iconectiv

Ed Antecol - COMsolve Inc.

Gerry Thompson - Interested Party

James Sewell - Westman Communications

Jeanne Bell - Allstream/Zayo

Jennifer Mack - Rogers

Jesslyn Mullaney - CRTC staff

John MacKenzie - TELUS

Justen Davis - Somos

Marc Berruyer - Videotron

Marie-Christine Hudon - Bell Canada

Michael Studniberg - Rogers

Olena Bilozerska - TELUS

Sarah Halko - iconectiv

Sarah Reilly - Distributel

Suresh Khare - Interested Party

Tammy Wilson - SaskTel

**General Introductions**

Kelly Walsh, as Chair of the committee, welcomed the attendees.

David Comrie reviewed the list of attendees on the bridge and the in-person attendees announced themselves.

**Agenda Review**

Kelly Walsh reviewed the agenda.



CNAG0224B – CSCN 128 agenda (incl. in-meeting changes)

Agreement was reached to accept the agenda as modified.

**Action Items Review**

David Comrie reviewed the action items from CSCN 127.

1. Joey-Lynn Abdulkader will initiate the process of sunsetting the MBI assignment guideline. **(Completed)**
2. Joey-Lynn Abdulkader will submit a contribution to sunset the *Canadian Adjunct to the INC Personal Communications Services (PCS) 5YY NXX Code Assignment Guidelines* **(Ongoing)**
3. The CNA will table for consideration a proposal to sunset the SIDs guideline for the next CSCN plenary meeting. **(Ongoing)**
4. Participants will consult internally whether or not they still use SIDs in their system for the next CSCN plenary meeting. **(Completed)**
5. David Comrie will follow-up on whether the task sponsors for TIF 112 need to be updated. **(Completed)**
6. David Comrie will inquire about Quebecor hosting CSCN 129. **(Completed)**
7. Fiona Clegg will include an update on if/when any Railway or Electricity Operators (REOs) begin requesting MNCs. **(Ongoing)**
8. CSCN chair will draft a letter to CRTC staff to request additional geographic and non-geographic NPAs after the CSCN has submitted the report for TIF 112 to the CISC for consideration. **(Completed)**
9. The CNA will put the 2-letter Canada Post province abbreviation in a column following Exchange Area on the CO Code Status data. **(Completed)**
10. The CNA will propose a TIF to update the NPA Relief Planning Guideline to define TSPs with improved granularity. **(Ongoing)**
11. Bell Canada will submit a draft TIF report for TIF 114 to create a Reference Document to sunset the MBI Assignment Guideline. **(Completed)**
12. Participants are asked to confirm to the CNA that they are no longer using AMPS, TDMA or CDMA within their networks. **(Completed)**
13. Fiona Clegg will draft a contribution to sunset the Canadian System Identifier (SID) Assignment Guideline contingent on the feedback received. **(Ongoing)**
14. CSCN Secretary will post CNTF116A and CNRE137A on the CNA website for comment. If there are no substantive comments within 10 business days, they will be considered final and sent to the CISC for consideration. **(Completed)**

**Review of Active TIFs**

David Comrie reviewed the active TIFs.

|  |  |  |  |
| --- | --- | --- | --- |
| **ACTIVE CSCN TIF SUMMARY** | | | |
| **#** | **TIF TITLE** | **SPONSORS** | **STATUS** |
| 105 | Review of the relief planning and number forecast processes associated with Relief of an Overlay NPA Complex | Marie-Christine Hudon | Ongoing  Accepted by CISC on 8 August 2019  TIF Report CNRE126A accepted by CISC on 22 April 2020  TIF Report CNRE129A accepted by CISC on 17 July 2020  TIF Report CNRE130A accepted by CISC on 17 July 2020  Telecom Decision CRTC 2020-379 issued on 25 November 2020 re: CNRE129A and CNRE130A  Telecom Decision CRTC 2021-217 was issued 8 July 2021 re: CNRE126A |
| 112 | Address assignment rate of Non-Geographic (6YY) CO Codes | Gerry Thompson & Karen Robinson | Ongoing  CNTF112A sent to CISC on 13 September 2022  Revised TIF sent to CISC on 30 January 2023  Revised TIF sent to CISC on 8 August 2023 |
| 113 | Updating the *Canadian Central Office Code (NXX) Assignment Guideline* | Jennifer Mack | Ongoing  CNTF113A sent to CISC on 19 July 2023  CNTF113A approved by CISC on 8 August 2023 |
| 114 | Sunset the *Canadian MIN Block Identifier (MBI) Assignment guideline* | Joey-Lynn Abdulkader | Ongoing  CNTF114A sent to CISC on 19 July 2023  CNTF114A approved by CISC on 8 August 2023 |
| 115 | Sunset the *Canadian Adjunct to the INC Personal Communications Services (PCS) 5YY NXX Code Assignment Guidelines* | Joey-Lynn Abdulkader | Ongoing  CNTF115A sent to CISC on 19 July 2023  CNTF115A approved by CISC on 8 August 2023 |
| 116 | Setting aside of the 3 remaining reserved Canadian Geographic NPA Codes for relief of exhausting NPA complexes | Marie-Christine Hudon | Ongoing  CNTF116A sent to CISC on 30 October 2023  CNRE137B sent to CISC on 30 October 2023 |

**Future Meeting Schedule and Hosts**

Kelly Walsh reviewed the current schedule for future meetings.

| **CSCN REGULAR FACE-TO-FACE MEETING SCHEDULE** | | | | |
| --- | --- | --- | --- | --- |
| **Meeting** | **Dates** | **Host** | **Location** | **Agenda Setting Conference Call** |
| CSCN 129 | Tue, 11-12 June 2024 | Quebecor | Montreal, QC | 28 May 2024, 13:00 – 14:00 ET |
| CSCN 130 | Tue, 8-9 October 2024 | Rogers | Brampton, ON | 24 September 2024, 13:00 – 14:00 ET (tentative) |
| CSCN 131 | 19-20 February 2024 | CRTC | Gatineau, QC | 5 February 2024, 13:00 – 14:00 ET (tentative) |

Kelly Walsh noted that recent CSCN meetings have been 1 day but with the increase in tasks for the CSCN, he is proposing that future meetings be scheduled for 2 days.

Action Item: David Comrie will contact Melanie Cardin about the possibility of hosting CSCN 129 over 2 days (11-12 June 2024) instead of 1. **(Completed)**

Jean-Michel Dupuis confirmed that Rogers can host CSCN 130 for 8-9 October 2024.

***Post meeting note*:** Melanie Cardin has confirmed that Quebecor will host CSCN 129 in Montreal on 11-12 June 2024.

**CRTC Staff Update**

Étienne Robelin reviewed CRTC actions including the CRTC letter to CNA restricting the assignment of CO Codes to the forecast amounts submitted by TSPs no later than the July 2023 NRUF.

Étienne Robelin discussed the Regulatory Policy to implement thousands-block pooling.

Suresh Khare asked about the status of the CSCN’s letter to CRTC about requesting additional NPAs for Canada from NANPA. Étienne Robelin noted that it has been received by the CRTC and is currently being considered.

**CSCN Chairmanship**

Kelly Walsh noted that a number of years ago the CNA was requested by the CISC to serve as Chair of the CSCN as no industry participants volunteered to take over the position when it was vacated.

Kelly Walsh asked if anyone would like to step forward to take over as Chair of the CSCN. There were no volunteers. Accordingly, the CNA will continue to act as Chair of the CSCN.

**CNA Discussion item – Implementation of Thousands-block pooling**

Kelly Walsh asked if anyone has any questions that they would like to ask CRTC staff regarding thousands-block pooling.

Kelly Walsh noted that later in the meeting there will be discussion about the CO Code Part 1 directive to the CNA in Telecom Regulatory Policy CRTC 2024-26 (the Policy).

John MacKenzie asked about discussing the requirement of a CLEC to have an NXX in each Exchange. Michel Murray asked if it was essential. John MacKenzie noted that the CLEC needs to have something to route to.

Ed Antecol noted that he does not believe that assignments should be blocks smaller than 1,000 because many of the systems in place are based on blocks of 1,000.

John MacKenzie noted that currently the minimum is 1,000.

Ed Antecol noted that the language in the Decision is somewhat problematic as Code/Block assignees need to execute 6-digit routing and will need at least 1 block assignment to identify their LRN.

Étienne Robelin noted that some concerns have been raised about certain statements in the policy and CRTC staff has circulated questions internally about issuing errata on their own or if changes need to come from the CRTC.

Karen Robinson asked about returning numbers from a contaminated thousand-block, if you have someone who just wants to establish an LRN number for porting and return the other 999 numbers. Marcel Champagne noted that you can just port away the other 999 numbers.

Connie Hartman noted that in the US, if you are the Code holder and now that code is moving to be a pooled code and you only need to retain one block, they would mark the original code as a pooled code, you would retain the original thousand block and the remaining 9 blocks would be put in the pool.

Suresh Khare noted that when a company goes into service, if 5 new entrants come into an exchange, each requiring a single thousand block, they will each be assigned a full NXX and then the remaining 9 thousand blocks from each NXX will be donated to the pool meaning there are 45 blocks available for assignment.

Karen Robinson noted that she has received questions about requiring LECs to get an NXX in an Exchange. The current requirement is for LECs to have an NXX in each Exchange Area in which they operate. Wireless service providers must have a POI in the ILEC Local Calling Area, but do not require an NXX in each Exchange Area.

Gerry Thompson asked about Exchange Area consolidation as raised in the Policy. Michel Murray noted everyone is going to be busy implementing thousand-block pooling over the next while so starting Exchange consolidation at the same time might be extra challenging but asked participants to consider if there is any low-hanging fruit regarding Exchange Area consolidation that could provide some benefits.

Jesslyn Mullaney noted that, in a 1K block regime, LECs would require at least a thousand block in each Exchange Area..

Michel Murray asked if, as of the date of TBP and a carrier does not need to get an entire code, is there a benefit to giving the option of requesting a thousand block earlier than the TBP implementation date? Would it be practical to not require someone to get a full CO Code in a new Exchange prior to TBP. Ed Antecol noted that it likely wouldn’t be supported technically prior to the implementation.

John MacKenzie noted that, apart from code sharing, the only option currently is to get a full NXX. If they have arranged a smaller block, then that way they wouldn’t need 10,000 phone numbers. That way they could either get a CO Code or just code share to go into an area.

Diane Dolan asked if, when Teksavvy does their CLEC expansions, they get a full CO code in each exchange but now, with this decision, do they need to just get a thousand block in each exchange so long as they have an LRN in the LIR? Ed Antecol noted that you need numbering resources in each exchange. But a fixed line carrier that wants to offer service in another exchange, you will need a block of numbers in that other exchange as well.

Michel Murray noted that we need to focus on number preservation and we need to put everything we can in place to reduce the waste. If you enter an LIR and you wish to have numbers in that pool, you need to have at least a thousand block in each Exchange.

Suresh Khare noted that unless there is an Exchange Area consolidation, he does not believe there is going to be much conservation as a result of TBP as far as exhaust is concerned.

Kelly Walsh presented CNCO224B.



CNCO224B – Proposed changes to CO Code Part 1 form

John MacKenzie noted that he has issues with each of the attestation bullets in paragraph 86 of the Policy. He proposes that the CNA and CSCN comply with the direction in the policy by using the exact attestation language so that the Part 1 form can be ready by the March 6 deadline and then any subsequent changes can go through the CISC process.

Kelly Walsh noted that he does not want to ask for an extension on the 6 March deadline. His plan is, as of March 6, the CNA will reject all Part 1s that do not have the attestation completed.

John MacKenzie noted that his issue with the attestations is in the language around “required” because, for example, some people in the industry might say it’s “required” because they did not feel like buying some software. He just doesn’t see the CSCN managing to amend it by March 6.

Fiona Clegg noted that the third bullet was the most contentious and the group will have to work on the document after.

Suresh Khare asked if this Commission direction supercedes all previous Decisions like approved Guidelines. Étienne Robelin noted that the most recent Decision would logically supercede any previous Decisions. He recommends that the CSCN use the language directly from the Decision.

Karen Robinson noted that section 4.6 of the Guideline says when you can request a new Code which conflicts with the Policy.

Kelly Walsh noted that the CNA will amend the Part 1 form as directed based on the language of the policy with no language changes.

Action Item: The CNA will post the updated CO Code Part 1 form with language verbatim from the Policy. **(Completed)**

***Post meeting note:*** The updated CO Code Part 1 form has been posted on the CRTC website and is also being sent to CO Code applicants as practical prior to March 6.

Kelly Walsh asked Ed Antecol to present an update on the TBP Questions Team.

Ed Antecol presented a list of top-level questions that need to be answered to get ready for TBP.



Ed Antecol – TBP Questions for Canadian Implementation

Karen Robinson asked about the Form 1b that is used for 1K block assignments in the US. Kelly Walsh noted that the Form 1b is actually not a Canadian form but is an appendix of the TBCOCAG.

Kelly Walsh presented his interpretation of a TBP Task breakdown based on the Regulatory Policy.



Kelly Walsh – TBP Task Breakdown for CSCN (w/ task sponsors listed)

Action Item: David Comrie will post a link to the TBCOCAG repository page on the CNA website and notify the CSCN. **(Completed)**

Ed Antecol noted that the Form 1B is used to get information into the NPAC.

Marie-Christine Hudon asked if it’s worth continuing outstanding work on the NRUF guideline as part of TIF 105 as it will need to be updated with regards TBP as well. Ed Antecol noted that he believes that updates related to TBP-related updates to the NRUF guideline should not happen until the CSCN decides what the NRUF process will be and TBP is implemented.

Kelly Walsh noted that his position is that the group carry on with the outstanding changes that would finish up the existing TIFs.

Suresh Khare noted that the proposed NRUF changes are less urgent since the CRTC issued a letter freezing all the forecasts for the next 5 years. TBP will be implemented before the CRTC restrictions are expected to lift.

Natalie Lessard asked about integrating the proposed changes related to the Part 1 attestation section. Kelly Walsh noted that they should be incorporated into the current contribution/TIF.

Action Item: David Comrie will post an updated version of CNCO216B that incorporates the attestations described in the Policy. **(Completed)**

**INC Report(s)**

Fiona Clegg presented INC 184 Issue Status Report to CSCN 128.



INC 184 Issue Status Report to CSCN 128

Fiona Clegg asked if she needs to start following INC issues related to TBP in the US. Gerry Thompson and Kelly Walsh noted that it would be recommended.

Action Item: Fiona Clegg will report on INC items related to Thousands-block pooling going forward.

Ed Antecol noted that the CNA currently participates in INC but recommended that others participate as well as he feels it would be valuable.

Ed Antecol noted that BIRRDS does some enforcement on effective dates and so when BIRRDS changes their effective date restrictions, he believes the Canadian guideline should be adjusted to follow suit.

Fiona Clegg noted that Canada currently can do expedited applications but they have to be done with CRTC approval. **(Ongoing)**

Kelly Walsh noted that in the US they are implementing shortened timeframes because the US has implemented new efficiencies that have made it possible, particularly with the NAS and PAS becoming combined NAS.

Kelly Walsh noted that even with current implementation window of 66 days in Canada, the CNA still sees delays and changes that are needed.

**CNA Update on Exhaust of Canadian MNCs**

Fiona Clegg presented the CNA Update on Exhaust of Canadian MNCs.

As of 2024-02-20

There are 99 MNCs available under Canada's MCCs of: 302

MNCs 000 and 99X are unusable for international purposes

98 usable unique two-digit codes

46 two-digit MNCs are still available for assignment

52 two-digit MNCs assigned

13 three-digit MNCs assigned

**CNA NPA Status Report**

David Comrie presented the CNA NPA Status Report.



NPA Status Report to CSCN 128

**CNA Discussion item – Non-Geographic 633 implementation**

Kelly Walsh noted that about 1 year ago NPA 633 was going to be implemented based on forecasting information available. NPA 633 was assigned to the CNA from NANPA and a Planning Letter was published. The CNA plans on implementing it in time to process any applications that require additional non-geographic codes beyond 622 exhaust.

Fiona Clegg noted that requests for non-geographic codes can come in chunks with some carriers requesting 50 codes at a time and there are currently 37 non-geographic codes still available.

**Introduction of the FCC NANC IoT Working Group**

Justen Davis as a representative of Somos made an oral presentation on behalf of Somos.

Justen Davis noted he is part of the IoT working group looking at utilization and looking to deliver a report to NANC by June 28, 2024.

Paraphrase:

The next in-person NANC session is planned around June 11 or 12 which unfortunately is just before the IoT report is expected to go public.

Within the US, a report was conducted that concluded that 42% of all TNs associated with cellular utilization are tied to IoT devices and since that report, non-telephony cellular devices have now surpassed telephony cellular devices.

The consumption of a telephony asset for the purpose of non-telephony utilization is increasing at a drastic rate. Is there something we can do different? Can we look at IP address schemes? Alphanumeric schemes? INC is really focused and targeted on what needs to happen from a NANP standpoint with regards to this increase.

If you think back to the NANP expansion report from 2002, roughly $50B would be needed to expand the NANP and add digits to that. What needs to happen from a NANP perspective? Look at changing NANP by increasing numbers.

Not limited to just looking at the NANP. Certainly the same sort of things happening from a global standpoint. One of the things being considered is looking at it from a country code perspective. This is currently being looked at from an ITU-T study group 2 perspective.

If we were to look at adding country codes does it add/augment the current convention within the NANP. Maybe traditional telephony falls under the current country code and non-telephony falls under the new country code.

Next week NARUC will be discussing where have all the numbers gone. It is looking at things at a more granular level as it relates to the States.

In looking at which IoT devices are really the contributors to this, within his household, he has 15 telephone numbers. Only 5 of those are true telephony. The rest are data only (tablets, smartwatches, smart meters, etc.) Automotive and utilities are two of the largest consumers. They are transitioning to be able to leverage carriers 5G systems which will require telephone numbers. In the automotive industry, they are transitioning from 4G to 5G which will require a telephone number.

As of the implementation of 5G, OnStar has discontinued their voice services and any calls that are placed from vehicles are based on tethering to the customer’s device.

Some of the stuff we are looking at in the IoT working group, the ability for us to create a separation between telephony and non-telephony resources and create a classification for them so we can say which devices need true connectivity vs those that just need data connectivity.

Taking into account the discovery work that has taken place regarding adding new numbers to the NANP, other methods to consider are separate telephony from non-telephony? Static vs nomadic (domestic vs internationally) vs hybrid?

Ed Antecol noted that in the TIF 112 working group we are looking at expanding to 12 or 14 digits and we were debating using a D-digit 0 to indicate it’s an expanded digit format. What implementations has the INC IoT working group been looking at in that area?

Justen Davis noted that if you look at it from a subordinate perspective, from his telephone number, you can add numbers to the tail end and make them subordinate to his telephone number. From a non-telephony standpoint, devices with that type of numbering would be then provided with the data they need.

Justen Davis noted that from a Ford Pro perspective, when a Ford comes off the line, they get assigned a number but it is subordinate to a Ford number. This allows it to maximize the E.164 namespace.

Ed Antecol asked how this would work in a consumer perspective. Justen Davis noted that from a consumer perspective, it could be tied to the customer’s phone number but if you go that route, then you have 10,000 locked to a single customer. It could all be managed by a provider. Just because a subordinate number is assigned doesn’t mean the parent number is not usable.

Gerry Thompson noted that CSCN has been working on TIF 112 for a while now. We have been hitting on a lot of the same things. Is there a website or something that Justen can share? Justen Davis noted that it is currently members-only but he will bring that up during the next IoT working group because it would be good to have the information shared.

Gerry Thompson asked for clarification on the term “data only”. Is it IoT or does it include a device like a tablet which is IoT but with human interaction. Justen Davis noted that he groups the two things together so a tablet and a fridge fall into the same category. When he was setting up his Apple watch, he had the choice to use the number associated with his watch from the factory or to use the number associated with his iPhone. He chose to use his iPhone number. So when he places a call, it places a call independent from his phone but masks it with the number from his iPhone.

Gerry Thompson noted that all the TIF 112 contributions and draft reports are available on the CSCN website.

**Other Business**

None

**Summary of Agreements Reached**

1. Agreement was reached to accept the agenda as modified.

**Summary of Action Items**

1. Joey-Lynn Abdulkader will submit a contribution to sunset the *Canadian Adjunct to the INC Personal Communications Services (PCS) 5YY NXX Code Assignment Guidelines* **(Ongoing)**
2. The CNA will table for consideration a proposal to sunset the SIDs guideline for the next CSCN plenary meeting. **(Ongoing)**
3. Fiona Clegg will include an update on if/when any Railway or Electricity Operators (REOs) begin requesting MNCs. **(Ongoing)**
4. The CNA will propose a TIF to update the NPA Relief Planning Guideline to define TSPs with improved granularity. **(Ongoing)**
5. David Comrie will contact Melanie Cardin about the possibility of hosting CSCN 129 over 2 days (11-12 June 2024) instead of 1. **(Completed)**
6. The CNA will post the updated CO Code Part 1 form with language verbatim from the Policy. **(Completed)**
7. David Comrie will post a link to the TBCOCAG repository page on the CNA website and notify the CSCN. **(Completed)**
8. David Comrie will post an updated version of CNCO216B that incorporates the attestations described in the Policy. **(Completed)**
9. Fiona Clegg will report on INC items related to Thousands-block pooling going forward. **(Ongoing)**

**Attachments**

*(Attachments have been inserted in the related sections of the minutes)*

CNAG0224B – CSCN 128 agenda (incl. in-meeting changes)

CNCO224B – Proposed changes to CO Code Part 1 form

Ed Antecol – TBP Questions for Canadian Implementation

Kelly Walsh – TBP Task Breakdown for CSCN (w/ task sponsors listed)

INC 184 Issue Status Report to CSCN 128

NPA Status Report to CSCN 128