**CRTC INTERCONNECTION STEERING COMMITTEE**

**Appendix 5 - Attachment – Dispute Position Form**

**CRTC INTERCONNECTION STEERING COMMITTEE**

**DISPUTE POSITION FORM**

**Working Group:                                                      Date of Submission:** 28 November 2017

**Dispute Position #: CNDI001**

**Dispute Title:** NPA Relief Planning (709 NL) Relief Date Change – Bell Canada Position.

**Originator(s):** Bell Canada

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**Position:** Modify the Implementation Date of NPA 879 in relief of NPA 709 (NL) as the Projected Exhaust Date (PED) has been pushed out until 2024.

**Background:**

**In Decision 2010-784**[[1]](#footnote-1)**, the Commission set aside area code 879 for future NPA relief in area code 709. On** 21 March 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 window for NPA relief with a 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 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). In other words, no relief is necessary at this time.

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 10D 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. TSPs 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.”

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 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.

Since Bell Canada’s proposed RIP was submitted, Rogers has filed comments opposing Bell Canada’s proposal for which we have provided our response. Specifically, Rogers argued that the public awareness campaign had already started and postponing the dates will cause customer confusion. Rogers is also concerned that costs have already been incurred to update their telecom systems.

In the following paragraphs we further address these arguments and reaffirm our position that deferring the relief implementation date remains appropriate.

**Bell Canada’s Position**

**Website and system IT development**

Rogers states 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, relief 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, and costs will have to be incurred eventually; however, incurring further costs at this time are 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 few other changes to implement. To put this into perspective, Bell Canada will
have to invest upwards of # in network costs in order to prepare for 10-digit dialing. Telus,
while they are remaining neutral in their position, noted during the 17 November 2017 RPC meeting that Bell Canada being the largest TSP would have the most work to complete in its networks.

“that TELUS position is to continue with the current schedule but is not opposed to delaying relief implementation and recognizes the fact that Bell is impacted the most by not delaying the relief implementation date as it is the largest TSP in the planning area and has the most work to do to complete the required network changes.”

As the Commission noted in its Decision delaying the RIP for area codes 226 and 519: “delaying the relief implementation date would be consistent with the latest numbering resource utilization forecast, and would be appropriate because it would allow telecommunication service providers (TSPs) to devote time and resources to more immediate projects.”[[7]](#footnote-7)

Given that area code 709 does not actually require relief at this time and the PED is now slated for 2024, Bell Canada is proposing the relief date be postponed in order to save on the investment and dedicate its resources to more immediate projects. It is wasteful to move ahead when no relief is actually necessary at this time.

**Public awareness campaign and customer communications**

Rogers argues that the public awareness campaign has 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 centre volumes. As a result, Rogers opposes delaying the relief implementation.

The NPA relief communications campaign, led by Telecom Alliance, 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 and start programming their equipment for 10-digit dialing. Bell Canada contributed 75% of the campaign cost.[[8]](#footnote-8)

In our view, while the public awareness campaign is underway, a further communication informing users they have more time for a transition is unlikely to be ill received or confusing. With the PED being pushed out so significantly it only makes sense to postpone any further relief efforts at this time. As noted above, while phase 1 of the campaign has been launched, this piece of the campaign was simply to bring awareness to the public that a new area code and 10-digit dialing would be coming to 709. The call to action, which is phase 2 of the campaign, is not scheduled to start until March 2018. Accordingly, Bell Canada has not met with secondary agencies such as Police, Fire and Ambulance agencies, to inform them that modifications to their PBX or call taking systems could be required. Therefore, consumers and Special users (9‑1‑1 secondary public safety answering points, alarm companies, ISPs, paging companies, etc.) who have not already begun implementing changes to their equipment and systems (which is likely the case in most instances), 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.

Further, the Government of Newfoundland and Labrador has sent a letter to the Commission dated 28 November 2017, advising they have no objections with Bell's revised area code implementation plan as they have not incurred any expenses towards earlier implementation of the new 879 code.

**Conclusion**

For the reasons explained above, Bell Canada maintains its position that deferring the relief implementation plan remains the most appropriate.

We respectfully request the Commission render a Decision by mid-February 2018 as we will need time to prepare a communication that either (a) notifies the public that the relief date has been delayed or; (b) move forward with phase 2 of the campaign, which is the call to action, currently scheduled to begin in March 2018.

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)
7. Telecom Decision 2014-338, paragraph 3. [↑](#footnote-ref-7)
8. Telecom Alliance cost is for both NPA 709 (public awareness campaign and 10 digit dialing) and 418 (public awareness campaign). [↑](#footnote-ref-8)