**CONTRIBUTION: NPA 709 Relief Planning Dates**

**Working Group: NPA 709 Relief Planning Committee (RPC)**

**Title**: **Rogers’ Comments on Proposed Changes to NPA 709 Relief Planning Dates**

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**RELATED TIF:** **NPA 709 Relief Implementation Plan**

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**Distribution NPA 709 Relief Planning Committee**

**NOTICE:**

This contribution has been prepared by Rogers Communications Canada Inc. (“Rogers”) for the purposes of discussion within the NPA 709 Relief Planning Committee members, and it is not to be considered a binding proposal upon Rogers. Rogers reserves the right to amend or withdraw any statements made in this contribution.

**Background**

Telecom Decision CRTC 2017-35 (2 February 2017) rendered determinations regarding NPA 709 relief planning, including approval of the Relief Implementation Plan (RIP) proposed by the NPA 709 RPC.

The Decision states:

1. *With respect to the transition to 10-digit dialing, the Commission determines that*
	* *the* ***permissive dialing period is to take place between 17 August and 9 November 2018****, with network announcements and automatic call completion for calls dialed using 7 digits being phased in during the period of 17 to 24 August 2018;*
	* ***mandatory 10-digit local dialing is to be implemented beginning on 10 November 2018****, with network announcements for calls dialed using 7 digits, stating that the caller must hang up and dial the area code with the 7-digit number, being phased in between 10 and 17 November 2018; and*
	* *standard network announcements stating that calls made using 7 digits cannot be completed as dialed are to be phased in between 2 February and 2 March 2019.*
2. *The* ***relief implementation plan includes a detailed implementation activity schedule, as well as the network and consumer communications activities that would need to be completed as part of the relief implementation process.*** *The Commission considers that the relief implementation plan includes steps that are consistent with the steps identified in the Canadian NPA Relief Planning Guideline and sets out implementation timelines that a telecommunications service provider can follow to meet the relief date.*
3. *In light of all the above, the Commission* ***approves*** *the relief implementation plan.*

[Emphasis Added]

The Jeopardy Condition in NPA 709 was suspended by the CNA effective 5 September 2017 due to the July 2017 NPA 709 R-NRUF results released by the CNA on 20 September 2017.[[1]](#footnote-1)

**Rogers’ Views on Postponement of NPA 709 Relief Dates**

For the following reasons, Rogers does not agree with Bell’s proposal to delay the NPA 709 relief dates listed in the CRTC-approved NPA 709 Relief Implementation Plan (RIP). The Bell proposal was presented to the NPA 709 RPC on 25 October 2017[[2]](#footnote-2).

1. The public awareness campaign[[3]](#footnote-3) has already started. Carriers have incurred costs for that campaign. Postponing the dates that include the CRTC-ordered 10-digit dialling date will likely create confusion for the public.
2. Carriers have also already started to notify their own customers (e.g. bill messages for landline and text messages for wireless customers). This activity is listed in the NPA 709 RIP as occurring between 24 February 2017 and 24 May 2017. Postponing NPA relief activities at this point in the process will likely create confusion for our customers.
3. Rogers has already incurred costs towards website updates, creation of customer-facing documents, back office system IT development, etc., to comply with Telecom Decision 2017-35. The same likely applies to other carriers that operate within NPA 709.
4. In reaction to the already-launched public awareness campaign, it is very likely that some end-users have already started to modify and update their telecom systems (e.g. PBX or alarm systems). They are also likely to have undertaken updates to business and personal documentation (e.g. their web sites, letterheads, business cards, etc.).
5. Rogers’ network implementation resources and budget for the anticipated NPA 709 2018 10-digit dialling and NPA 879 overlay dates are already in-place to comply with Telecom Decision 2017-35.
6. If the NPA 709 relief dates are modified as Bell proposes, Rogers and the industry at large will need to spend additional effort and money to notify our customers again, stating that dates including the mandatory 10-digit dialling date have been modified. This will likely generate call centre volume from customers posing questions. This will increase our call centre costs. And all affected carriers will have to re-do the consumer awareness work again in a few years.
7. 10-digit dialing is not a bad thing. Nomadic VoIP customers and wireless roamers would benefit from a consistent 10-digit dialing plan across most or all provinces. Canadians are travelling more and more so they would benefit by having the same dialing experience when dialing a local phone number, no matter where they are.
8. The CRTC-approved NPA 709 relief implementation plan has begun! Requesting the Commission to review its 2 February 2017 Telecom Decision, then render a new decision might take too much time. As identified above, changing the dates “mid-stream” will be disruptive and confusing to carriers and end-users. Further, the existing NPA 709 Relief Implementation Plan cannot afford to wait a few months while waiting for a determination from the Commission.
9. The change in the NPA 709 Projected Exhaust Date (PED) from the R-NRUF was unexpected. Explaining to the public that the industry was wrong by 4 years might increase their frustration and skepticism facing the telecom industry and the Commission as a whole. And of course, future R-RUFs for NPA 709 could bring the PED to a date closer than that predicted in the July 2017 R-NRUF. This would trigger the need for yet another change in the NPA 709 RIP if the Bell proposal is adopted.
10. Rogers believes that it is too late in the NPA 709 Relief Implementation to change dates for the above reasons and that the existing CRTC-approved RIP should be retained. Rogers appreciates the NPA 709 Relief Planning Committee’s time in considering the issues identified in this contribution.

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1. <http://cnac.ca/npa_codes/relief/709/relief_709.htm> [↑](#footnote-ref-1)
2. <http://cnac.ca/npa_codes/relief/709/relief_709.htm> [↑](#footnote-ref-2)
3. <http://cnac.ca/npa_codes/relief/709/documents/709_TA_CRTC_progress_report_1.pdf> [↑](#footnote-ref-3)