



Ottawa, 11 June 2021

**Our reference: 8621-C12-01/08**

**BY EMAIL**

Mr. Kelly T. Walsh  
CNA Program Manager  
Canadian Numbering Administrator  
150 Isabella Street, Suite 605  
Ottawa, Ontario K1S 5H3  
[kelly.walsh@cnac.ca](mailto:kelly.walsh@cnac.ca)

**RE: Future Relief –Numbering Resource Utilization Forecasts**

Dear Mr. Walsh:

In a letter to Commission staff, dated 10 May 2021, the Canadian Numbering Administrator (CNA) noted that there are presently a number of area code complexes across Canada that are undergoing relief planning and implementation activities. The CNA noted that the Canadian Numbering Resource Utilization Forecast Guideline requires that forecasts be performed every six months at the exchange level for these area code complexes.

However, the CNA noted that the Canadian NPA Relief Planning Guidelines state that the only relief method that should be considered for area code complexes is the distributed overlay relief method. With relief options limited to distributed overlay area codes, the CNA indicated that the Proposal for Relief of an Area Code Complex (PROC) can be drafted without forecast data at the exchange level of detail.

Thus, the CNA requested that it be instructed to perform future R-NRUFs at the NPA level of detail for those geographical areas that are served by multiple existing overlay area codes.

Commission staff considers that where area code relief is to be provided by an overlay area code there is no additional benefit to the CNA in having data at the exchange level as no analysis will be performed on an exchange by exchange basis in assessing alternative relief methods.

Staff notes that in the C-NRUF Attributes Table, on page 7 of the Canadian Numbering Resource Utilization Forecast (C-NRUF) guideline, there is a provision for CRTC staff to approve alternative reporting requirements for R-NRUFs.

Therefore, staff agrees that future R-NRUFs should be performed at the area code level of detail where multiple area codes serve the same geographic area.

Sincerely,

*Original signed by*

Michel Murray  
Director, Dispute Resolution & Regulatory Implementation  
Telecommunications Sector

c.c.: Bill Mason, CRTC, [bill.mason@crtc.gc.ca](mailto:bill.mason@crtc.gc.ca)  
Suresh Khare, CNA, [suresh.khare@cnac.ca](mailto:suresh.khare@cnac.ca)