



**CANADIAN NUMBERING ADMINISTRATION CONSORTIUM INC.**

**c/o Welch LLP, Billing and Collection Agent  
350 Albert Street, Suite 700,  
Ottawa, ON K1R 1A4**

January 31, 2025

«FirstName» «LastName»  
«JobTitle»  
«Company»  
«Address1»  
«Address2»  
«City», «Province» «Postal\_Code»

Dear Sir or Madam:

**Re: Request for Reporting Worksheet - 2025 Telecommunications Services Revenue Funding – Administration of Canadian Numbering Resources**

Welch LLP is the billing and collection agent (“**B&C Agent**”) for Canadian Numbering Administration Consortium Inc. (“**CNAC**”). As mandated by the Canadian Radio-television and Telecommunications Commission (“**CRTC**”), CNAC is responsible for supervising the administration of numbering resources in Canada. The CRTC has generally directed that all entities that are entitled to obtain and have been issued numbering resources directly from the Canadian Numbering Administrator are Eligible Persons<sup>1</sup> that are required to fund the costs of numbering administration.

Your organization (“**company**” or “**entity**”) has been determined to be an Eligible Person.<sup>2</sup> **As a result, your company is required to submit a Reporting Worksheet and the other documents described herein, setting out your company’s telecommunications service revenue for year ended December 31, 2024, to Welch LLP no later than April 1, 2025. If your company did not earn Canadian telecommunications**

---

<sup>1</sup> An Eligible Person is generally an entity that is entitled to obtain numbering resources directly from the Canadian Numbering Administrator and includes a telecommunications service provider that falls within the definition of Canadian Carrier under the *Telecommunications Act* and also includes entities that are a CIO/REO (electrical, railway, etc.) and/or a Public Safety Network Operator (police, fire, etc.). Subject to a minimum annual fee, each Eligible Person is required to pay to CNAC its pro-rata share of the annual numbering administration costs based on the Eligible Person’s share of total Canadian telecommunications services revenue. A detailed definition of Eligible Person is found in Schedule A attached to this letter.

<sup>2</sup> CNAC and Welch LLP (CNAC’s Billing and Collection Agent) annually obtains a list of the entities that are assigned numbering resources from the Canadian Numbering Administrator in order to compile the Eligible Person list.



**revenue in 2024, you are still required to complete and file the reporting worksheet information indicating zero revenues.** The information being requested will assist CNAC in setting the annual fee that is payable by your company to fund the administration of numbering resources in Canada.<sup>3</sup> Welch LLP has been appointed by CNAC to act as its Billing and Collection Agent (“**B&C Agent**”) for the purpose of determining the applicable annual fee to be collected from each Eligible Person and will be the entity that will process the information that you provide in response to this letter.

### *Confidentiality of Information*

The information provided in response to this letter is confidential information and will be safeguarded by CNAC and the B&C Agent and will be used solely for the implementation of the CNAC funding mechanism for numbering administration in Canada.

### *Exemption Request*

If you believe that your company is not an Eligible Person, you are required to complete and submit an exemption request form to the B&C Agent **no later than April 1, 2025**. The exemption requirements and filing process and requirements and applicable form are set out in Attachment 4.

**Please note that if you have been assigned any numbering resources (except for a Carrier Identification Code), you will likely not be entitled to an exemption.**

An exemption form must be filed by each company requesting an exemption, even if (i) the companies are affiliated to each other and/or (ii) your company was granted an exemption in a prior year. Failure to submit an exemption request form to the B&C Agent by April 1, 2025 will result in your company being deemed to be an Eligible Person for that year and your company will be required to pay an annual fee and applicable late filing fees including interest. In this event, the B&C Agent will use an estimate of your company’s revenues to determine the fee to be paid by your company.<sup>4</sup>

## **I. Reporting Worksheet Revenue Data**

The revenue data<sup>5</sup> to be set out in the Reporting Worksheet to be submitted will be used to calculate the applicable annual fee to be paid by your company to fund the administration of numbering resources in Canada for the period between July 1, 2025 and ending on June 30, 2026. Following such calculation, the B&C Agent will invoice your company for the applicable fee on the relevant payment dates based on the method of payment that your company selects on the filing of the Reporting Worksheet and related documents.

---

<sup>3</sup> CNAC develops a budget and estimates the cost to administer numbering for the annual period between July 1 to June 30 of each year and Eligible Persons fund this amount based on the funding mechanism mandated by the CRTC. Eligible Persons that require numbering resources are not required to pay any other fee to obtain numbering resources from the Canadian Numbering Administrator (“**CNA**”). Additional background information is set out in Schedule B attached to this letter. See CRTC website for additional information: <http://www.crtc.gc.ca/cisc/eng/cisf3f1.htm>

<sup>4</sup> The estimate is determined using the past revenue information filed by your company.

<sup>5</sup> Past year’s revenue data is used as an estimate of your company’s use of numbering resources in the current year.



Please note that as an Eligible Person, your company is required to report on the Reporting Worksheet all Canadian telecommunications services revenue that it and any Acquired TSPs (as defined below) earned during the reporting period from services that directly or indirectly make use of Canadian numbering resources regardless of whether (i) the Acquired TSPs have been assigned numbering resources or not; (ii) the services make use of numbering resources obtained and/or (iii) the numbering resources are used by a third party. It is your company's responsibility to ensure that the revenue information provided on the Reporting Worksheet is complete and accurate. This includes seeking professional advice where necessary. Please note that neither CNAC nor the B&C Agent are authorized to provide any professional advice or detailed information as to what service and revenue is to be included on the Reporting Worksheet other than what is included on the CNAC website and in this letter. CNAC reserves the right to review and/or verify the information provided on the Reporting Worksheet and request clarification and/or additional information from your company as it deems necessary, including certification from an independent third-party accountant (at your company's cost). If this review results in a different revenue number for your company, this may result in a change to your company's fee and your company will be responsible to pay to CNAC any additional fee that results.

### ***Mobile Revenue Clarification***

In response to inquiries received from several TSPs regarding the extent and type of mobile service revenue is required to be reported on the Reporting Worksheet, CNAC contacted Commission staff to seek their clarification on this issue. Following their review, Commission staff have confirmed their opinion that revenue from all wireless services falls within the scope of the "wireless telephony services" as referenced in the Canadian telecommunications services revenue definition used for CNAC reporting purposes:

*Wireless service providers need to allocate and activate specific numbering resources to provide data services over a mobile wireless network. CRTC staff are therefore of the view that wireless data services, which use numbering resources, fall within the scope of "wireless telephony services" and are therefore "telecommunications services."*

*As such, data services provided over a mobile wireless network should be factored into total telecommunications services revenue for the purpose of calculating contributions to Canadian Numbering Administration.<sup>6</sup>*

**As a result, companies are required to include all mobile revenues (including from voice, data and bundled voice/data services) in the revenue information provided with their reporting worksheet to be filed with CNAC.** A copy of the letter setting out CRTC staff's guidance on the mobile services revenue scope is available upon request.

In January 2024, a Part 1 application was filed by a TSP with the Commission seeking official clarification of the mobile service definition. As of the date of this letter, the Commission has not yet issued its decision on this application. Based on the CRTC decision once it is issued, Eligible Persons may be required to refile

---

<sup>6</sup> Letter dated 11 July 2023 from Michel Murray, Director, Dispute Resolution & Regulatory Implementation, Telecommunications Sector, CRTC to Bill Barsley and Glenn Pilley of CNAC, Page 2.



their 2025 reporting worksheet along with one or more prior years which may result in a change to the CNAC fees to be paid or paid. CNAC will issue an advisory notice following the Commission’s decision to advise Eligible Persons of the next steps.

### ***Acquisition of TSPs***

If your company has completed an acquisition, amalgamation, asset purchase or merger of or with another TSP (referred to as an “**Acquired TSP**”) anytime either in 2024 or the first quarter of 2025, and you are not filing a separate reporting worksheet for the Acquired TSP, you will be required to report revenue information for all Acquired TSPs for all of 2024.<sup>7</sup>

**Please note that if you are submitting a separate Reporting Worksheet for the Acquired TSPs, such worksheet will be required to include the revenue for the Acquired TSPs for all of 2024.**

### ***Consolidated Filing for Affiliated TSPs***

If you operate affiliated TSPs under common control, you have the option to file one Reporting Worksheet on behalf of your company and the affiliated TSPs (“**Consolidated TSP Report**”). If you opt to provide a Consolidated TSP Report, you will be required to:

- (a) clearly list on the Reporting Worksheet the names of all the TSPs that you are reporting on;
- (b) provide aggregate telecommunications revenue for all the TSPs that you are reporting on; and
- (c) select one of the TSPs as the entity to be responsible to pay the annual fee.

Please note, if the fee is not paid when due, all the TSPs that are included in the Consolidated TSP Report may be subject to administrative action including, but not limited to, suspension and the loss of access to additional Canadian numbering resources, reclamation of currently assigned numbering resources, late fees, reinstatement fees and interest.

### ***Revenue Comparison – Prior Year***

In order to allow us to better identify possible reporting and related issues, you are required to include in the Reporting Worksheet a detailed narrative description, including but not limited to auditable financial data, of the reasons for any significant change in the revenue (increase or decrease 10% or greater) from revenue reported in your company’s last Reporting Worksheet filed (including in relation to an Acquired TSP). In order to assist your company with this information a copy of your company’s last reported

---

<sup>7</sup> For example, if your company: (a) acquired a TSP in July 2024, you would be required to include revenue information for the Acquired TSP for all of 2024 in your company’s reporting worksheet; or (b) acquired a TSP in February 2025, you would be required to include revenue information for the Acquired TSP for all of 2024 in your company’s reporting worksheet.



Reporting Worksheet is provided as an attachment to this letter. CNAC and/or the B&C Agent reserve the right to request additional information from you following their review of your explanation provided. **Please note that your Reporting Worksheet package will not be considered complete until CNAC is satisfied with the information provided.**

The type of information that is required to be provided to explain significant changes in revenue includes the following:

- (a) year by year breakdown of revenue difference, listed by different revenue sources (ie. data, voice, LD, etc.
- (b) percentage decrease or increase
- (c) meaningful explanation as to reasons for the decrease or increase in revenue including both written explanation and supporting financial data (ie. loss of major customer, material decline in customer demand, discontinuation of a service offering, etc.)

The explanation provided should be at a level to allow for the information to be independently verified or audited if CNAC requires. A general description just stating the percentage increase or decrease will not satisfy the requirement. **Until CNAC is satisfied with the explanation provided, the reporting worksheet will be considered to be incomplete and this may lead to suspension and the loss of access to additional Canadian numbering resources and late and reinstatement charges being incurred.**

### ***Reporting Worksheet Errors***

CNAC will permit the refiling of Reporting Worksheets for the current reporting year (2024) and for the immediately previous year only (2023) in case an error is discovered by you in the information filed. A refiling due to factors other than an error is not permitted. Reporting Worksheets for reporting periods prior to 2023 are deemed to be final and no changes initiated by your company will be permitted.

If an applicable Reporting Worksheet contains incorrect information and you wish to refile, you are required to provide CNAC through the B&C Agent the following:

- (a) the corrected Reporting Worksheet along with affidavits to support the revised revenue numbers;
- (b) a letter setting out: (i) a detailed explanation of the revised numbers; and (ii) a description as to how and why the error occurred; and
- (c) if you are filing on behalf of an Acquired TSP, a legal opinion letter showing your company's legal right to make such filing and entitlement to any refund in fees paid as a result.

CNAC reserves the right to request clarification and/or additional information from your company as it deems necessary, including certification from an independent third-party accountant (at your company's cost). Once satisfied with the information provided, CNAC will either issue a refund if there was an



overpayment of fees or issue an invoice for any fee that was underpaid, in each case based on the revised revenue numbers filed.

### **OCN Information**

Due to ongoing changes to the make-up of Canadian TSPs, Operating Company Numbers (“OCNs”) that were originally assigned to a TSP may not accurately reflect the current holders of the numbering resources assigned to such OCN. In order to update this information and provide for an accurate accounting of the holders of OCN (and related numbering resources), you will now be required to include a list of all OCNs held by your company (and affiliated TSPs if filing a consolidated report) as part of the Reporting Worksheet.

## **II. Required Action**

Each Eligible Person is required to submit to the B&C Agent the following documents as applicable **by no later than April 1, 2025** (please see Schedule A for definitions for the terms set out below):

### **A. Entities Required to Submit Reporting Worksheet (note: skip to B. below if you are filing an exemption application):**

1. **Reporting Worksheet** showing your company’s 2024 revenues from Telecommunications Services for the period from January 1, 2024 to December 31, 2024 (including the list of OCNs held), duly executed by an officer of the company (including revenue and OCN list from affiliated TSPs including any TSPs acquired during the year, if applicable). If you are completing a Consolidated TSP Report, the revenues (and OCN lists) to be presented are the aggregate for of all TSPs included in the Reporting Worksheet (*See attachment 1 for the form of the Reporting Worksheet*).
2. An **Affidavit** sworn by the chief financial officer (CFO) and another officer of your Company attesting to the accuracy of the revenue and OCN and related information included on the Reporting Worksheet (*see attachment 2 for the form of the affidavit*). **Please note that for the affidavit to be valid, it must be sworn by both the CFO and a second officer of the Company. The affidavit is also required in the event that your company is reporting zero (0) revenue for the applicable period.** If you are submitting a Consolidated TSP Report, the Affidavit must attest to the revenue and OCN and related data of all the affiliated TSPs included in the Reporting Worksheet (*see attachment 3 for the form of the affidavit*). **Please note that, notwithstanding the delivery of the Affidavit, CNAC and/or the B&C Agent has the right to require you to obtain and submit verification of your company’s revenues by an independent auditor (at your company’s cost).**
3. On the Reporting Worksheet, your company is also required to select the payment frequency of the annual fee from one of the options set out below (**Your company will be deemed to have selected the single payment option set out in (a) below if no payment frequency option is indicated in the Reporting Worksheet delivered to the B&C**



**Agent):**

(a) One (1) single payment due: June 1, 2025.

(b) Four (4) equal quarterly payments due:

- (i) June 1, 2025;
- (ii) September 1, 2025;
- (iii) December 1, 2025; and
- (iv) March 1, 2026.

(The quarterly payment amount is determined by dividing the total fee by four (4)). Each quarterly payment incurs an additional charge of \$115 (\$460 per year) to cover additional processing costs involved;

(c) Twelve (12) equal monthly payments due:

- (i) June 1, 2025; and
- (ii) eleven (11) subsequent payments due on the first day of each month thereafter with the last payment being due on May 1, 2026.

(The monthly payment amount is determined by dividing the total fee by twelve (12) (the "**Monthly Payment Amount**"). Each monthly payment incurs an additional charge of \$115 (\$1,380 per year) to cover additional processing costs involved.

**Your filing requirements will not be considered complete unless and until all the documents set out in this Section III A of this letter have been properly and fully completed, duly executed and delivered to the B&C Agent. Any documents not properly completed or executed by the due date will be considered late and your company will be subject to a late filing fee and other sanctions such as suspension.**

**B. Entities Making Exemption Request Only (note: only complete if you meet qualifications for exemption, otherwise complete A. above):**

1. A properly completed exemption form (*see attachment 4 for the form of the Exemption Request*).



### III. Fees

#### 2025 Annual Fee

The annual fee for your company for 2025 will be determined based on the following.<sup>8</sup>

Table 1

Annual Gross Revenues from Telecommunications Services <sup>(i)</sup>	Percentage Share of Funding Costs <sup>(ii)</sup> (A)	Baseline Fee (B)	Annual Fee (A+B) <sup>(iii)</sup>
Less than \$5,000,000	% of 2025 Funding Requirement (\$50 Minimum)	\$50	% of 2025 Funding Requirement (A) + \$50 (B) (\$100 Minimum)
\$5,000,000 or greater	% of 2025 Funding Requirement (\$1,250 Minimum)	\$1,250	% of 2025 Funding Requirement + \$1,250 (\$2,500 Minimum)

Notes to Table 1:

- I. As set out on Reporting Worksheet.
- II. Percentage is determined by dividing your company's Telecommunications Revenues by the aggregate of Telecommunications Revenues reported by all Eligible Persons on Reporting Worksheets filed.
- III. Annual Fee is subject to GST or HST (or equivalent), as applicable.

#### Additional Fees

In addition to the annual fee, the following additional fees may be applicable to compensate the B&C Agent and/or CNAC for additional processing:

Table 2

Payment Frequency	Fee charged for payments made monthly or quarterly <sup>i</sup>	Late Filing Fee <sup>ii</sup>	Late Payment Fee <sup>iii</sup> (per payment date missed)	Suspension Fee <sup>iv</sup>
Annual	-	\$490	\$370	\$600 + \$100/month
Quarterly	\$115	\$490	\$370	\$600 + \$100/month
Monthly	\$115	\$490	\$370	\$600 + \$100/month

Notes to Table 2:

- I. Fee is applicable to TSPs that select monthly or quarterly payment option for Annual Fee (maximum processing fee: Monthly: \$1,380; Quarterly: \$460)

<sup>8</sup> If you are submitting a Consolidated TSP Report, the fee will be determined based on the aggregate of all of the revenues of the affiliated TSPs being reported on.



- II. Fee for Annual Reporting Documents (properly completed) that are not filed by the April 1 due date
- III. Fee for missing applicable fee payment deadline. The late fee is charged for each late payment. Late payments will also be subject to 18% p.a. interest from original due date until amount is paid in full.
- IV. Fee for TSP being suspended by CNAC and includes a monthly fee of \$100 continues for each month that TSP remains suspended. The suspension fee and all other applicable fees are required to be paid in full prior to suspension being lifted.

Additional fees will be invoiced to the TSPs, and such invoices are due upon receipt.

### ***Funding Requirement***

Please note that the funding requirement in any given year could vary significantly from the previous year. In recent years, the year-over-year variance has averaged approximately +/- 7% and has been as high as +/- 18%. Your individual experience could be more or less than average depending on your company's revenue change when compared to the industry average. A rigorous budgeting process is in force, but various factors influence the projected funding requirement including but not limited to the projected CNA work volumes and the impact of any surplus or deficit carried forward from the previous budget year.

### ***Failure to File/Late Payments***

**The filing of the Annual Reporting Documents and/or payment of the annual fee (including additional fees if applicable) is mandatory for Eligible Persons. The failure to file documents as required by CNAC, including the Annual Reporting Documents (at all or late) and/or the failure to pay fees invoiced will result in additional fees being charged (see above) and may result in numbering resources being suspended and/or may result in numbering resources already issued being reclaimed from your company. In the event that your company is suspended, no numbering resources will be assigned by the Canadian Numbering Administrator to your company until such time as the suspension has been lifted by CNAC. The suspension of numbering resources or any reclamation may hamper your company's ability to continue to carry on its telecommunications business.**



#### **IV. Delivery of Documents**

All the documents required to be filed by this letter, as applicable, are to be sent to the B&C Agent to the attention of Gail Yeung, CPA, CA:

by fax to (613) 236-8258; or

by e-mail at [cnac@welchllp.com](mailto:cnac@welchllp.com); or

by mail to the following address:

Welch LLP  
350 Albert Street, Suite 700  
Ottawa, ON  
K1R 1A4

Attention: Gail Yeung, CPA, CA

#### **V. Electronic Forms**

Electronic versions of the reporting worksheet, form of affidavit and exemption request forms are available on the Canadian Numbering Administrator website ([www.cnac.ca](http://www.cnac.ca)) at the following link: [https://cnac.ca/cnac/CNAC\\_funding\\_forms.htm](https://cnac.ca/cnac/CNAC_funding_forms.htm)

\* \* \* \* \*



Thank you for your prompt consideration of this letter. If you have any questions or concerns related to this matter, please contact Gail Yeung of Welch LLP at 613-236-9191, or via e-mail at [cnac@welchllp.com](mailto:cnac@welchllp.com).

Yours truly,



Bryden McMaster, Partner  
Welch LLP, B&C Agent for CNAC

Schedules and Attachments:

Schedule A – Applicable Definitions

Schedule B – Background

Attachment 1 – Form of Reporting Worksheet

Exhibit 1– Consolidated TSP Report

Exhibit 2- OCN Information

Attachment 2 – Form of Affidavit – Single TSP

Attachment 3 – Form of Affidavit – Consolidated TSP

Attachment 4 – Exemption Request

Exhibit A – Exemption Request

Exhibit B – Applicable Definitions

Attachment 5 – Copy of Prior Year Reporting Worksheet



## SCHEDULE A

### Applicable Definitions

**“Affidavit”** means the affidavit sworn by the chief financial officer and a second officer of an Eligible Person attesting to the accuracy of the revenues of the Eligible Person as set out in the Reporting Worksheet, the form of which is attached at Attachment 2 (Single TSP Report) and Attachment 3 (Consolidated TSP Report).

**“Canadian Carrier”** means a Canadian carrier as defined in the *Telecommunications Act*, S.C. 1993, c. 38, as amended.

**“Canadian International Carrier”** means a Canadian Carrier which provides Telecommunications Services between any place in Canada and any place outside Canada.

**“CNA”** means the Canadian Numbering Administrator.

**“CIO/REO”** means critical infrastructure organizations and railway and electrical operators.

**“CLEC”** means a Canadian Carrier that has satisfied the requirements to become a competitive local exchange carrier as contemplated by Telecom Decision CRTC 97-8 or as otherwise determined by the CRTC.

**“CSCN”** means the Canadian Steering Committee on Numbering or any successor thereof.

**“Eligibility Criteria for Shareholders”** means a Person that is an ILEC, a CLEC, an Independent Telephone Company, a Canadian International Carrier, an Inter-exchange Carrier or a Wireless Service Provider.

**“Eligible Person”** means a Person that is permitted to obtain numbering resources directly from the CNA including a CIO/REO, a Public Safety Network Operator and an entity that fulfils the Eligibility Criteria for Shareholders and, for greater certainty, does not include a Person that is an Internet Service Provider, a Paging Service Provider, a Reseller or an End-Customer unless that Person otherwise satisfies the Eligibility Criteria for Shareholders.

**“End-Customer”** means a person that purchases Telecommunications Services (for the purpose of this definition, the meaning of Telecommunications Services shall be the same as the one defined in the *Telecommunication Act*, S. C. 1993, c. 38, as amended) provided by Canadian Carriers or by a Reseller as defined herein.

**“GST”** means goods and services tax imposed under Part IX of the Excise Tax Act (Canada).

**“ISED”** means Innovation, Science and Economic Development Canada.

**“ILEC”** means any of TELUS Communications Company, MTS Allstream Inc., Saskatchewan Telecommunications, Bell Canada, Telebec Limited Partnership, Northwestel Inc., Bell Aliant Regional Communications, Limited Partnership or their successors, or as otherwise determined by the CRTC.

**“Independent Telephone Company”** means a Canadian Carrier that is any of the small incumbent local exchange carriers identified by the CRTC in Decision CRTC 2001-756.

**“Interexchange Carrier”** means a Canadian Carrier that provides interexchange Telecommunications Services that are interconnected to the PSTN.

**“Internet Service Provider”** means a Person who provides access to the internet, including but not limited to, services such as electronic mail and internet information services.

**“Numbering Resources”** means the numbering resources administered by Canadian Numbering Administrator.

**“Operating Company Number”** or **“OCN”** is a code used to uniquely identify and associate a company with certain records in iConectiv’s databases and in related output products (e.g. LERG™ Routing Guide, V&H coordinates data in the TPM™ Data Source and are used in various telecommunications industry processes primarily to identify TSPs.

**“Paging Service Provider”** means a Person duly licensed under the Radiocommunications Act, R. S., 1985, C.R-2, as amended, who provides to its customers, via a radio paging terminal and system, a one-way or two-way telecommunications service consisting of a voice or alphanumeric message.

**“Public Safety Network Operator”** means an entity that has been authorized by ISED as an 700 MHZ public safety broadband network operator.

**“Public Switched Telephone Network”** or **“PSTN”** means the world-wide voice telecommunications network, or any portion thereof, which utilizes the International Telecommunications Union (ITU) Recommendation E. 164 numbering plan, or as amended, of which the NANP is an integral part, and which is composed of all transmission, signaling and switching facilities supplied and operated by all telecommunications common carriers, including wireless and wireline carriers, for use by the public.

**“Reporting Worksheet”** is the document in the form as set out in Attachment 1 and sets out the revenues from Telecommunications Services earned by the Eligible Person for the period from January 1 to December 31 of the applicable year.

**“Reseller”** means a Person that is not a Canadian Carrier and which is engaged in the resale of Telecommunications Services using facilities obtained from other telecommunications service providers.

**“Telecommunications Services”** means services which are provided over the PSTN by Eligible Persons and which utilize Numbering Resources including, for greater certainty and without limitation, local exchange services, long distance services, wireless telephony services, and international long distance services; but shall exclude enhanced services (e.g. call answer, speed dialing, three-way calling), the sale or lease of terminal equipment (e.g. telephone sets, PBX’s, key systems, answer-record machines, computers), the sale or lease of private lines, other private line and private network services, internet services, and paging services.

**“Telecommunications Services Revenue”** means revenues derived from providing Telecommunications Services (such revenue is to be measured in accordance with Canadian generally accounting principles).



**“Type III CLEC”** means a CLEC that relies on the facilities of an ILEC or CLEC, either directly or through a resale arrangement, generally for switching and/or interconnection to other ILECs and/or CLECs to provide local VoIP Services and has greater than 10,000 local exchange service telecommunications subscribers, and includes a CLEC that would otherwise qualify as a Type IV CLEC that ceases to offer local VoIP Services through a resale arrangement with ILEC or CLEC and commence offering local VOIP Services using its own facilities. The 10,000 local exchange service subscribers’ threshold applies to the total number of local VoIP Service subscribers that the CLEC has in all the exchanges served, irrespective of other services such as internet access.

**“Type IV CLEC”** means a CLEC that offers local VoIP Services through a resale arrangement with another ILEC or CLEC and has 10,000 or fewer local exchange service telecommunications subscribers. A number of specific CLEC obligations and requirements could be fulfilled on behalf of the small CLEC by the third party. The 10,000 local exchange service subscribers’ threshold applies to the total number of local VoIP Service subscribers that the CLEC has in all the exchanges served, irrespective of other services such as internet access.

**“VoIP Service”** means voice communication services using Internet Protocol (IP) that use telephone numbers that conform to the North American Numbering Plan (NANP) and provide universal access to and/or from the public switched telephone network (PSTN).

**“Wireless Service Provider”** means a Canadian Carrier, which is duly licensed under the *Radiocommunication Act R.S. 1985, c. R-2*, as amended and which is authorized to provide wireless telecommunications services and wireless personal communications services).



## SCHEDULE B

### Background

Under the *Telecommunications Act*, the CRTC is authorized to administer telecommunications numbering resources and has the authority to delegate any of its powers over number administration to any person.

The CRTC mandated the Canadian Steering Committee on Numbering (CSCN) to recommend the way numbering resources should be administered in Canada. The CSCN agreed that an independent third party should perform the administration and assignment of numbering resources (i.e., the Canadian Numbering Administrator or CNA). Furthermore, the CSCN agreed that an independent third party should perform the function of billing and collecting the costs of number administration (i.e., the Billing and Collection Agent or B&C Agent). Accordingly, certain participants of the CSCN voluntarily formed the Canadian Numbering Administration Consortium Inc. (CNAC) to engage and manage a third party to act as the CNA and a vendor for the billing and collection function in Canada.

The CRTC has also directed that the costs associated with the establishment and funding of an independent CNA are to be recovered from persons that use and benefit from numbering resources in Canada as contemplated by the consensus position adopted by the CSCN on October 30, 1997. Persons that are obligated to fund the CNA are those who fulfil the “Eligibility Criteria for Shareholders” as defined in the CNAC Unanimous Shareholders Agreement (“USA”) (see *attachment A for definitions*). A copy of the USA may be obtained at: [https://cnac.ca/cnac/Final-CNAC\\_Shareholders\\_Agreement-October\\_1\\_2021.pdf](https://cnac.ca/cnac/Final-CNAC_Shareholders_Agreement-October_1_2021.pdf).

In general, entities required to fund numbering administration include any entity that is authorized to obtain numbering resources directly from the CNA, including CIO/REOs, Public Safety Network Operators, ILECs, CLECs, Independent Telephone Companies, Canadian International Carriers, Inter-exchange Carriers and Wireless Service Providers. Please see CRTC direction regarding funding of CNAC that can be obtained at the website: <http://www.crtc.gc.ca/cisc/eng/cisf3f1h.htm>

Eligible Persons are obligated to fund the CNA by making a payment equal to its share of the costs of number administration determined by its percentage share of the industry’s gross telecommunications service revenues, subject to an annual minimum charge, plus an annual base-line fee. Pursuant to article 1.1 of the USA, Telecommunications Services are defined as:

*services which are provided over the PSTN by Eligible Persons and which utilize Numbering Resources including, for greater certainty and without limitation, local exchange services, long distance services, wireless telephony services, and international long distance services; but shall exclude enhanced services (e.g. call answer, speed dialing, three-way calling), the sale or lease of terminal equipment (e.g. telephone sets, PBX’s, key systems, answer-record machines, computers), the sale or lease of private lines, other private line and private network services, internet services, and paging services. Revenue from these services constitutes telecommunication service revenue.*

**ATTACHMENT 1  
FORM OF REPORTING WORKSHEET**

**Canadian Numbering Administration Reporting Worksheet – Due April 1, 2025  
(Late fees shall apply if deadline missed)**

This Reporting Worksheet will be used to allocate Canadian numbering administration costs during the period July 1, 2025 to June 30, 2026.

Please read and follow the instructions in the attached letter when completing this Reporting Worksheet.

**For assistance in completing this Reporting Worksheet, please call Gail Yeung at (613) 236-9191.**

The information provided by your company on this Reporting Worksheet is confidential information and will be safeguarded by CNAC and Welch LLP (CNAC’s Billing and Collection Agent) and used solely for the implementation of the CNAC funding mechanism for numbering administration in Canada.

ORIGINAL FILING       REVISION TO ORIGINAL FILING       CONSOLIDATED TSP REPORT

ACQUIRED TSPs \_\_\_\_\_  
(If this Box is checked please include the name of all telecommunications service providers (“TSP(s)”) acquired since the date the last Reporting Worksheet was filed. If acquired TSPs are filing their own reporting worksheets, it is not necessary to name the acquired TSP)

---

**Block 1: Entity Identification**

Legal Name of Entity <  
Name Entity is doing business as <

Principal business utilizing numbering resources (Check the one box that best describes entity’s operations)

- |  |   |
|--|---|
| <input type="checkbox"/> ILEC                          | <input type="checkbox"/> Wireless Service Provider      |
| <input type="checkbox"/> CLEC                          | <input type="checkbox"/> Interexchange Carrier (IXC)    |
| <input type="checkbox"/> Independent Telephone Company | <input type="checkbox"/> Canadian International Carrier |
| <input type="checkbox"/> REO/CIO                       | <input type="checkbox"/> Public Safety Network Operator |

If you are submitting a Consolidated TSP Report, please also complete the chart that is attached as Exhibit 1 to this worksheet including the above information for each affiliated Entity to be included in the worksheet. Only entities that are affiliated with each other (as the term affiliate is defined in the *Canada Business Corporations Act*) are permitted to be included in a Consolidated TSP Report.

---

**Block 2: Revenue Information**

2024 Telecommunications Service Revenue <  
(From January 1 to December 31, 2024)

Report revenues in whole dollars. Negative revenue is to be reported as \$0.

If filing a Consolidated TSP Report the revenue to be reported is to be the aggregate revenue of all affiliated entities.

---

**Block 3: Revenue Comparison**

**2024 Telecommunications Services Revenue Reported:** \_\_\_\_\_  
**2023 Telecommunications Services Revenue Reported:** \_\_\_\_\_  
**Year over Year (YOY) Percentage Change:** \_\_\_\_\_

Provide an explanation for any YOY Revenue change (increase or decrease) of 10% or greater (please include a separate sheet if further space is needed.)

The type of information that is required to be provided to explain significant change in revenue includes the following:

- (a) year by year breakdown of revenue difference, listed by different revenue sources (ie. data, voice, LD, etc.)
- (b) percentage decrease or increase
- (c) explanation as to reasons for the decrease or increase in revenue including both written explanation and supporting financial data (i.e. loss of major customer, material decline in customer demand, discontinuation of a service offering, etc.)

The explanation provided should be at a level to allow for the information to be independently verified or audited if CNAC requires. A general description just stating the percentage increase or decrease will not satisfy the requirement. **Until CNAC is satisfied with the explanation provided, the reporting worksheet will be considered to be incomplete and this may lead to late charges being incurred**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

---

**Block 4: Entity Responsible for Payment of Fees (If submitting Consolidated TSP Report)**

Entity \_\_\_\_\_  
Contact Name \_\_\_\_\_  
Contact Telephone Number \_\_\_\_\_  
Contact E-mail \_\_\_\_\_

**Block 5: Payment Option Selection**

---

Our selected payment options are (select 1 only):

- One (1) single payment due: June 1, 2025
- Four (4) quarterly payments due: (i) June 1, 2025, (ii) September 1, 2025, (iii) December 1, 2025 and (iv) March 1, 2026  
(the quarterly payment amount is determined by dividing the total fee by four (4))
- Twelve (12) monthly payments, (i) with the first payment due June 1, 2025; and (ii) eleven (11) subsequent payments due on the first day of each month thereafter with the last payment being due on May 1, 2026.  
(the monthly payment amount is determined by dividing the total fee by twelve (12))

NOTE: There are additional fees if opting to pay the annual fee quarterly or monthly (see Table of Additional Fees section in the Reporting Worksheet).

NOTE: Payments which are not received by the CNAC Billing & Collection Agent by the due date are subject to Late Payment Fees. If no option is selected above, you will be deemed to have selected the single payment option.

**Block 6: Operating Company Numbers (OCNs) Information**

---

Include in Exhibit 2 attached to this Reporting Worksheet a list of all Operating Company Numbers (OCNs) that the Entity and/or affiliated TSPs (if filing a consolidated TSP report) that are assigned numbering resources. The failure to provide a fully completed Exhibit 2 along with this Reporting Worksheet will result in an incomplete and late filing and subject your company to late fees and potentially other sanctions.

**Block 7: Officer's Certification**

---

I certify that I am an officer of the entity named above, that I have examined the foregoing report, and that to the best of my knowledge, information and belief: (i) all statements of fact contained in this Reporting Worksheet are true; (ii) said Reporting Worksheet is an accurate statement of the Telecommunications Service Revenues of the above named entity (or entities if submitting a Consolidated TSP Report or a report including Acquired TSP revenue); and (iii) if submitting a Consolidated TSP Report, all entities included in the Reporting Worksheet are affiliates of each other (as the term affiliate is defined in the *Canada Business Corporations Act*; for the period January 1, 2024 through December 31, 2024.

Printed Name of Officer < \_\_\_\_\_

Position with Entity < \_\_\_\_\_

Signature < \_\_\_\_\_

Date < \_\_\_\_\_

Billing Contact Person < \_\_\_\_\_

Telephone Number of Billing Contact Person < \_\_\_\_\_

E-mail address < \_\_\_\_\_

Complete Billing Address:

E-mail address for invoice:  
(if different from contact person's e-mail address) < \_\_\_\_\_

---

**Please fax or email PDF copy of Reporting Worksheet to:**

**Fax # : (613) 236-8258; Attention: Gail Yeung**

**E-mail: [cnac@welchllp.com](mailto:cnac@welchllp.com)**

**or mail original to:**

**Canadian Numbering Administration Consortium Inc.  
c/o Welch LLP  
350 Albert Street, Suite 700  
Ottawa, ON K1R 1A4  
Attention: Gail Yeung**

***PLEASE DO NOT INCLUDE A PAYMENT WITH THIS REPORT. YOU WILL BE INVOICED AT A LATER DATE.***

**EXHIBIT 1**  
**to Attachment 1 - Reporting Worksheet**  
**Affiliate Entity Information**  
**Consolidated TSP Report**  
**(Please provide information below for all affiliated entities)**  
**(Please use additional chart as necessary)**

Legal Name	Name Entity Doing Business As (if different than Legal Name)	Principal Communications Business	2024 Telecommunications Service Revenues
------------	---	--------------------------------------	--

**Reporting Entity:**

		Choose the one that best describes the entities operations.	
--	--	---	--

**Affiliated Entities:**

1		Choose the one that best describes the entities operations.	
2		Choose the one that best describes the entities operations.	
3		Choose the one that best describes the entities operations.	
4		Choose the one that best describes the entities operations.	
5		Choose the one that best describes the entities operations.	
6		Choose the one that best describes the entities operations.	
7		Choose the one that best describes the entities operations.	
8		Choose the one that best describes the entities operations.	
9		Choose the one that best describes the entities operations.	
10		Choose the one that best describes the entities operations.	
<b>Total Consolidated 2024 Telecommunications Service Revenues to report in Block 2 of attachment 1</b>			



**ATTACHMENT 2  
FORM OF SINGLE ENTITY AFFIDAVIT**

**IN THE MATTER OF THE REPORTING WORKSHEET TO BE DELIVERED TO  
THE CANADIAN NUMBERING ADMINISTRATION CONSORTIUM  
FOR THE PURPOSES OF CALCULATING ANNUAL FEE**

I, \_\_\_\_\_ [name, e.g. John C. Doe], OF THE \_\_\_\_\_ [location, e.g. city, town or municipality] OF \_\_\_\_\_ [Province or State]; and

I, \_\_\_\_\_ [name, e.g. John C. Doe], OF THE \_\_\_\_\_ [location, e.g. city, town or municipality] OF \_\_\_\_\_ [Province or State]

EACH MAKE OATH AND SAY AS FOLLOWS:

1. \_\_\_\_\_ is the Chief Financial Officer of \_\_\_\_\_ [Name of Company] (the “Company”) and as such I have personal knowledge of the matters hereinafter deposed to except where stated to be based on information and belief and where so stated I verily believe the same to be true.
2. \_\_\_\_\_ is the \_\_\_\_\_ [Name second officer position] of the Company and as such I have personal knowledge of the matters hereinafter deposed to except where stated to be based on information and belief and where so stated I verily believe the same to be true.
3. Attached as Exhibit “1” to this our affidavit is the copy of the Reporting Worksheet of the Company for the year ended December 31, 2024 to be delivered to Welch LLP as billing and collecting agent of Canadian Numbering Administration Consortium Inc. (“Reporting Worksheet”).
4. To the best of our knowledge, information and belief, the statement of the facts contained in the Reporting Worksheet is true and (i) the revenue information as set forth in Block 2 of the Reporting Worksheet is an accurate statement of the telecommunications services revenue of the Company for the year ended December 31, 2024 and the explanation for any change in the amount of revenue reported as compared to the reported revenues for the period ended December 31, 2023 of 10% or greater is an accurate statement of the explanation and/or rationale for change in revenue, as defined in the letter from the B&C Agent to the telecommunication service provider dated January 31, 2025; and (ii) sets out a list of all Operating Company Numbers (OCNs) that the Entity holds numbering resources through.

SWORN BEFORE ME at the \_\_\_\_\_ of \_\_\_\_\_  
in the \_\_\_\_\_ of \_\_\_\_\_  
this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
(Signature of CFO affiant)

\_\_\_\_\_  
(a Commissioner, etc.)

SWORN BEFORE ME at the \_\_\_\_\_ of \_\_\_\_\_  
in the \_\_\_\_\_ of \_\_\_\_\_  
this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
(Signature of Second Officer affiant)

\_\_\_\_\_  
(a Commissioner, etc.)

**EXHIBIT "1"**  
**To Attachment 2 - Affidavit**

**Reporting Worksheet for the Year Ended December 31, 2024**

[Completed reporting worksheet to be attached]

**ATTACHMENT 3  
FORM OF CONSOLIDATED ENTITY REPORT AFFIDAVIT**

**IN THE MATTER OF THE REPORTING WORKSHEET  
TO BE DELIVERED TO THE CANADIAN NUMBERING ADMINISTRATION CONSORTIUM  
FOR THE PURPOSES OF CALCULATING ANNUAL FEE**

I, \_\_\_\_\_ [name, e.g. John C. Doe], OF THE \_\_\_\_\_ [location, e.g. city, town or municipality] OF \_\_\_\_\_ [Province or State]; and

I, \_\_\_\_\_ [name, e.g. John C. Doe], OF THE \_\_\_\_\_ [location, e.g. city, town or municipality] OF \_\_\_\_\_ [Province or State]

EACH MAKE OATH AND SAY AS FOLLOWS:

1. \_\_\_\_\_ is the Chief Financial Officer of \_\_\_\_\_ [Name of Company] (the “Company”) and as such I have personal knowledge of the matters hereinafter deposed to except where stated to be based on information and belief and where so stated I verily believe the same to be true.
2. \_\_\_\_\_ is the \_\_\_\_\_ [Name second officer position] of the Company and as such I have personal knowledge of the matters hereinafter deposed to except where stated to be based on information and belief and where so stated I verily believe the same to be true.
3. Attached as Exhibit “1” to this our affidavit is the copy of the consolidated Reporting Worksheet of the Company for the year ended December 31, 2024 to be delivered to Welch LLP as billing and collecting agent of Canadian Numbering Administration Consortium Inc. (“Reporting Worksheet”).
4. All the entities (the “Affiliated Entities”) that are listed in the Reporting Worksheet are affiliates of each other (as the term affiliate is defined in the *Canada Business Corporations Act*).
5. To the best of our knowledge, information and belief, the statement of the facts contained in the Reporting Worksheet is true and (i) the revenue information as set forth in Block 2 of the Reporting Worksheet is an accurate statement of the telecommunications services revenue of the Company for the year ended December 31, 2024 and the explanation for any change in the amount of revenue reported as compared to the reported revenues for the period ended December 31, 2023 of 10% or greater is an accurate statement of the explanation and/or rationale for change in revenue, as defined in the letter from the B&C Agent to the telecommunications service provider dated January 31, 2025; and (ii) sets out a list of all Operating Company Numbers (OCNs) that the Entity and affiliated TSPs (holds numbering resources through.

SWORN BEFORE ME at the \_\_\_\_\_ of \_\_\_\_\_  
in the \_\_\_\_\_ of \_\_\_\_\_  
this \_\_\_\_th day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
(Signature of CFO affiant)

\_\_\_\_\_  
(a Commissioner, etc.)

SWORN BEFORE ME at the \_\_\_\_\_ of \_\_\_\_\_  
in the \_\_\_\_\_ of \_\_\_\_\_  
this \_\_\_\_th day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
(Signature of Second Officer affiant)

\_\_\_\_\_  
(a Commissioner, etc.)

**EXHIBIT "1"**  
**To Attachment 3 - Affidavit**

**Reporting Worksheet for the Year Ended December 31, 2024**

[Completed reporting worksheet to be attached]

## **ATTACHMENT 4 EXEMPTION REQUEST**

Please note that in order to qualify for an exemption your company must satisfy the following criteria:

- (1) Your company has not been assigned any Numbering Resources<sup>9</sup> from the CNA other than a Carrier Identification Code; or
- (2) Your company has only been assigned a Carrier Identification Code.

If your company does not satisfy the above criteria, you will not be entitled to an exemption and your company will be required to provide the documents requested and pay the applicable annual fee in order to continue to obtain numbering resources from the CNA. Failure to submit an exemption request form to the B&C Agent by the required due date will result in your company being deemed to be an Eligible Person for that year and your company will be required to pay an annual fee and applicable late filing fees including interest. A copy of the exemption request form is set out below in this Attachment 4.

Following receipt of a completed exemption request form, CNAC will review the information provided. If CNAC identifies issues with respect to the information provided, CNAC will advise you by letter of the issues and you will have thirty (30) days to respond to such issues. If CNAC continues to have issues following its review of the additional information, your company will be notified that the exemption request has been denied. In the event that your exemption request is denied, your company will be required to submit the Reporting Worksheet and other related documents described below within 30 days of CNAC's decision and you will be required to pay the applicable annual fee.

In the event that CNAC approves your company's exemption request, a letter will be sent to you confirming your company's exemption for the period beginning July 1, 2025 and ending on June 30, 2026 (the "2025 Funding Requirements").

---

<sup>9</sup>**Numbering Resources**" means the numbering resources administered by CNAC.

**EXHIBIT A**  
**To Attachment 4 - Exemption Request**

*This certificate is to be completed by any entity requesting an exemption from the funding mechanism for the administration of Canadian numbering resources, which is administered by the Canadian Numbering Administration Consortium Inc. (CNAC) under the regulatory oversight of the Canadian Radio-television and Telecommunications Commission (CRTC). An exemption will only be granted if all of the statements set out in the exemption request certificate are true and correct.*

*A new Exemption Request Form must be submitted each year.*

**EXEMPTION REQUEST CERTIFICATE**

**TO:** Canadian Numbering Administration Consortium Inc. (“**CNAC**”)

**AND TO:** Welch LLP (“**Welch**”)

**RE:** Request to be exempt from the funding mechanism for the administration of Canadian numbering resources for the period beginning on July 1, 2025 and ending on June 30, 2026 (the “2025 Funding Requirement”)

---

The undersigned hereby certifies the following:

1. I am the \_\_\_\_\_ [**Name Office Held**] of \_\_\_\_\_ [**Name of Company**] (the “**Company**”) and as such I have personal knowledge of the matters hereinafter deposed to except where stated to be based on information and belief and where so stated I verily believe the same to be true. I understand that the information provided in this certificate is to be used by CNAC to decide as to the requirement of the Company to assist in the funding of the administration of numbering resources in Canada.
2. The Company (A) has not been assigned any Numbering Resources<sup>10</sup> of any kind including any Central Office Codes or any other numbering resources , or (B) has only been assigned a Carrier Identification Code.

**DATED** as of \_\_\_\_\_

\_\_\_\_\_  
Name:  
Title:  
Company:

---

<sup>10</sup> “**Numbering Resources**” means the numbering resources administered by CNAC.

**ATTACHMENT 5**  
**Prior Year Reporting Worksheet**

**[attached]**