

Canadian Steering Committee on Numbering

Date: 13 December 2024

BY EMAIL

To: Secretary General
Canadian Radio-television and Telecommunications Commission
Ottawa, Ontario
K1A 0N2

ATTN: Marc Morin

Subject: Delay of CSCN TIF 112 Follow-up report recommending number extension details

Dear Sir,

On 2 April 2024 the Canadian Steering Committee on Numbering (CSCN) submitted report CNRE138B (*Methods to Address the High Assignment Rate of Non-Geographic (6YY) CO Codes*) through the CRTC Interconnection Steering Committee (CISC). The report was self initiated by the CSCN through TIF 112 (*Address assignment rate of Non-Geographic (6YY) CO Codes*) to address a significant acceleration in the rate of Non-Geographic NXX assignments that would substantially impact the number of NPA Codes reserved for Non-Geographic assignments in Canada. With no changes to mitigate the assignment rate in place, the July 2024 NRUF forecasts that Canada will exhaust the last Non-Geographic NPA in the reservation pool by May 2029. The report recommended various options to mitigate the exhaust of currently available numbering resources for Non-Geographic NPAs in the foreseeable future.

Two options explored in the report (Options 7a and 7b) discussed designating two future Non-Geographic NPAs as Extended 6YY NPAs.¹ Under these options, instead of numbers being assigned using the current NANP 1+10-digit format, the numbers would use an extended format of 1+12 or 1+14 digits. In CNRE138B, the CSCN noted that they would come to an agreement about which extended digit format would be most suitable and make recommendations in a subsequent report to be filed no later than 31 December 2024.

In the meantime, the Federal Communications Commission (FCC) North American Numbering Council (NANC) working group for Internet of Things (IoT) has been working on a report concerning mitigation of Non-Geographic number exhaust in the NANP. The CSCN's understanding is that the work conducted by the CSCN helped inform the report being written by the NANC IoT working group. The NANC IoT working group, however, is a closed forum and CSCN participants are not privy to the content of their meetings. The CSCN understands that a report is scheduled to be voted on by the NANC on 13 December 2024 and, if passed, the report is expected to be made available to CSCN participants shortly afterwards. As the NANC IoT report likely makes recommendations about similar options, the CSCN participants would prefer to be aware of the outcome of that work before continuing their own work. The CSCN will want to review and consider the factors in the NANC IoT report and may want to make recommendations that align with it.

Consequently, the CSCN intends to delay the follow-up report to CNRE138B so that participants may gain access to the published NANC IoT report. Should the IoT report be approved, the CSCN believes our

¹ Option 7: Extended 6YY NPAs is introduced in Section 4.7 and analyzed as a full solution in Section 5.1.

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follow-up report can be completed by 31 March 2025. In the event the NANC IoT report is delayed further, the CSCN would look to complete its own report approximately 3.5 months after the NANC IoT report is approved.

While the CSCN understands the tight timeline for implementing the extended digit format, it believes that it may be beneficial to align the recommendations for Canada's approach with that of the NANC IoT report. Should the CRTC approve recommendations 1 and 2 from CNRE138B and also make a positive determination, by 27 September 2025, regarding the extended digit format to be recommended in the follow-up report; NPA 677 (the first of the intended extended number format NPAs) would be required by February 2028. This date lies within the completion range dates for the extended number format of 30 September 2027 and 30 September 2028.

Sincerely,

Sent via email by

Kelly T. Walsh
Chair
Canadian Steering Committee on Numbering

c.c. Michel Murray, CRTC staff
Étienne Robelin, CRTC staff