**CRTC INTERCONNECTION STEERING COMMITTEE**

**CONTRIBUTION FORM:**

**Working Group:     CSCN           Date of Submission: 6 May 2024**

**Contribution #: 233C File ID: CNCO233C**

**TIF #:     119**

**Task Title: Inclusion of unused numbers from previously assigned CO Codes**

**in pool of available thousand-blocks**

**Related TIFS: TIF 117 – TBP Implementation Monitoring**

**TIF 118 – Update CSCN-Administered Guidelines for**

 **Thousands-Block Pooling**

**TIF 120 – Report on LIR Expansion or Exchange Area**

 **Consolidation Opportunities**

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**Distribution to: CSCN Participants**

**NOTICE:** This contribution has been prepared by TekSavvy for the purposes of discussion in the CSCN, and it is not to be considered a binding proposal on TekSavvy. TekSavvy reserves the right to amend or withdraw statements made in this contribution at any time.

**Background:**

**The CRTC issued Telecom Regulatory Policy CRTC-2024-26 on 5 February 2024. Paragraph 66 of the Policy directs CISC to examine the inclusion of unused numbers from previously assigned CO Codes in the number pooling inventory and file a report to the Commission by 6 August 2024. Paragraph** 67 of the Policy states that the report should also make recommendations on the detailed steps, roles and responsibilities, and timelines to implement the mechanism, including whether it should be implemented at the same time as the initial implementation of TBP or in a subsequent phase as soon as possible thereafter.

Discussion:

Te**kSavvy is submitting this contribution to facilitate discussions to address the following items to be covered in the TIF 119 report:**

1. Whether inclusion of unused numbers from previously assigned codes in the pool should be implemented at the same time as the initial implementation of TBP or in a subsequent phase as soon as possible thereafter;

CSCN supports the inclusion of unused numbers from previously assigned codes in the pool in the initial implementation of TBP. The availability of donated number blocks will reduce the demand for new CO Code assignments. As industry forecasts indicate the current Canadian inventory of geographic numbers could exhaust before 2030, every effort should be made to convert to the use of thousand block assignments at the beginning of the TBP implementation.

[The block return process from a previously retained CO Code is a critical process to the implementation of thousands block pooling for the efficient use of numbering resources. As such, an initial implementation (in a limited region for a limited number of CO Codes) should include the return of one or more unused blocks prior to the allocation of new thousands blocks]

It is recommended that the block return process commence prior to the block request process subject to the development of a detailed implementation plan.

1. Whether there should be a general cleanup or other process, or both, and whether the process(es) should be voluntary or mandatory;

TekSavvy believes that there should be a mandatory annual requirement for all CO Code holders to audit and perform a cleanup of their numbering resources. Code holders should assess the contamination level of each block per CO Code and donate thousand blocks that are within the acceptable contamination level.

During the thousands-block pooling question team meetings, a suggestion was brought forward to impose additional requirements for inventory review when a NPA complex is in jeopardy status. TekSavvy agrees with this approach.

[There should be a cutoff for rural Exchange Areas where thousands-block pooling is not implemented because there won’t be any associated number conservation efficiencies.]

[Yes and mandatory for all LNP Exchanges.]

[Yes it should be done once by everybody. There should be periodic utilization reports which should trigger further clean-up as appropriate.]

[In the US, Carriers file telephone number utilization reports along with their NRUFs and forecasted demand. Having an assessment of number utilization by Exchange Area is the starting point for any necessary clean-up process. Where a Carrier’s utilization percentage is very low for an Exchange Area, they should consider a clean-up of the resources associated with that Exchange Area in the interval post-filing of their annual utilization reports. on an annual basis should focus on those areas of the country where utilization ]

It is still an open issue whether carrier forecasting of block demand should be annual or semi-annual at a minimum.

Excess inventory is determined in part by forecasted demand.

1. Whether number blocks should be returned if they are not used after a specific period of time;

TekSavvy recommends the return of number blocks if they are not used after a 1-year period. The purpose of implementing TBP is to conserve number resources. If unused number blocks are not donated back to the pool, this will contribute to number exhaust rather than number conservation.

Blocks requested but not put in service within 6-months of the Effective Date should be treated in the same manner as CO Codes.

Return of which excess inventory of blocks is at the discretion of the Carrier subject to the contamination thresholds (i.e., which blocks to return) and not based on individual block usage history.

1. What other criteria may be relevant, such as the population or population growth of a given exchange;

A low population density and the number of LECs operating in an exchange, are contributing factors to number exhaust. For example, if the population in an exchange is 200 people and there are 5 LECs operating in that exchange, there will be an excess of unassigned numbers.

Rollout priority for TBP needs to be developed in an implementation plan which may or may not include delaying TBP for rural areas. (Section 17 of TBCOCAG “Supplemental Implementation Meetings”)

1. What level of contamination is acceptable;

Currently the contamination threshold level in the US is 10% or less (but they are currently considering raising this limit). As discussed at the thousands-block pooling question team meetings, TekSavvy agrees that the Canadian industry should match the US contamination threshold level.

Ten percent for now and subject to potential increase in the future. Contamination includes: ported out numbers, assigned numbers, reserved numbers, administrative numbers, and numbers in the aging pool.

1. How the snap-back process would work with any new mechanism(s);

During thousands-block pooling question team discussions, participants discussed how the snapback process would work with TBP. The new process was documented in the Memorandum from the Thousand-Block Questions Team to the CSCN which recommended NPAC related requirements for thousands-block pooling implementation in Canada. This is an excerpt from the Memorandum:

a) PA will need to obtain NPAC reports when processing requests for the return of numbering resources from SPs (for both thousands-block and CO code returns).

b) The NPAC SMS shall use the default routing restoration information in the Number Pooling Block Holder Information as the block holder default routing, when a ported pooled telephone number is disconnected (or port to original port is activated), and returns the TN(s) to the block, once the Block exists.

c) The NPAC SMS shall send a notification to the Code Holder, and suppress the notification to the Block Holder, when a ported pooled telephone number is disconnected from a block that has been returned to the PA. However, even though the customer disconnect date notification goes to the Code Holder, the TN cannot be re-assigned in their inventory in regions where thousands block pooling is in place. Code Holder receives the notification in order to provide vacant number treatment as applicable.

TekSavvy agrees with the process outlined in the memorandum.

Modifications to NPAC must be completed to accommodate thousand block pooling in the Canadian Region. TekSavvy suggests that the required changes to NPAC be discussed at CLNPC to understand the required updates and associated costs that the CLNPC shareholders will incur.

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