**CONTRIBUTION: CNCO249A**

**Working Group**: **Canadian Steering Committee on Numbering (CSCN)**

**Title**: **Proposed Submission**

**DATE: 27 May 2024**

**RELATED TIFs:** **TIF 118:** **Recommendations on timeline and utilization for ordering numbering resources**

**Source: Rogers, Bell Canada and KRob Telecom Numbering Solutions**

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**Filename:** CNCO243B TIF 118 COMsolve.doc

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**Recommendation 5 from CNCO248A:** Once Thousands-Block Pooling is in service, then one year later, it is recommended that the requirements for Months-to-Exhaust be reduced from 12 months to 6 months where no Jeopardy Condition exists.

**Timeline Recommendation:**

The months-to-exhaust should remain at no more than 12 months when no Jeopardy Condition exists, or when an NPA is in a Jeopardy Condition, no more than 4 months of the period specified by an approved Jeopardy Contingency Plan (see Sections 4.2.1 and 9.5 of the Guideline).

Rationale:

It is suggested that Thousand-Blocks can be activated in a shortened interval (eg 33 days vs 66 days). This condition is only applicable if numbering inventory has been previously made available to the PA. However, if the applicant’s request exceeds currently available PA inventory, a new CO code application is required, extending this period to a minimum of 66 days. TSPs should always plan for the longer activation period of 66 days, though it could in some cases, be less.

Moving from the current 12 months to the proposed 6 months-to-exhaust timeline would not produce any significant benefits towards aiding in the conservation of numbers.

Risk:

Moving the Industry toward just-in-time inventory management comes with much higher risks that reduces and limits each Telco’s ability to react and response independently to its own specific corporate needs.

**Recommendation 2 from CNCO248A:** Carriers shall be deemed ineligible for additional geographic numbering resources for growth in an Exchange Area where the carrier’s utilization of TNs is less than 75%. Carriers requiring additional geographic TNs that do not meet the 75% utilization threshold may apply to the CRTC for an exception. For each application for additional (growth) geographic TN resources, Exchange Area Utilization shall be calculated by the applicant in accordance with the formula and definitions below. The required calculation shall be part of an amended Appendix B to the *Canadian Central Office Code (NXX) Assignment Guideline*.

**Utilization Recommendation:**

75% utilization should not be used as a qualifier for ordering numbering resources as there is no consideration for forecasting changes or periodic activation spikes. Continue use of the current Appendix B assignment methodology, while implementing the necessary changes that capture TB assignments.

Rationale:

Utilization does not consider forecasting adjustments or growth changes that occur periodically throughout the year. Utilization values from periods of lower growth may not amount to 75% utilization which may jeopardize a company’s ability to order numbering resources in preparation for peak seasons or unforeseen consumer demands.

Risk:

Does not consider growth spikes and could put a TSP exchange in jeopardy condition.