**CONTRIBUTION: CNCO292A**

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

**Title**: **DRAFT** **Proposal for a Controlled Technical Trial of Thousands-Block Pooling (“TBP”) in the Markham Exchange**

**DATE: 10 September 2025**

**RELATED TIFs:**

**Source: Bell**
Joey-Lynn Abdulkader and Marie-Christine Hudon

**Distribution:** CSCN Thousand Block Pooling Participants

**Filename:**

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

**Proposal**

On 24 July 2025 the Carriers filed an intervention responding to the Independent Telecommunications Providers Association (“ITPA”) Part 1 Application, by which the ITPA requested that the Commission defer implementation of TBP for Small-Number-Pool Telecommunications Service Providers (“SNP-TSPs”) until October 2026. Recognizing the operational concerns raised by the ITPA, the Carriers proposed an alternative, exchange-based rollout schedule that more closely aligns with the phased approach successfully employed in the United States and avoids the risks inherent in a nation-wide, “flash-cut” deployment. As discussed in the Carriers’ intervention this approach includes a controlled technical trial of TBP in a single exchange to serve as an initial step in the rollout.

To implement this approach, the Carriers recommend that the CSCN designate the **Markham exchange** (NPA 905/289/365/742) as the locus of an initial, limited technical trial of TBP. The Markham exchange comprises **16** actively operating TSPs, none of which are members of the ITPA, thereby eliminating the principal concern articulated in the ITPA Application while still providing a robust and operationally complex test bed.

 **Key Advantages of Selecting the Markham Exchange for the Initial TBP Trial**

1. **High-Demand Environment** – Markham consistently exhibits among the highest central-office (“CO”) code exhaust rates in the Greater Toronto Area. Early activation of TBP in this exchange will materially slow the depletion of geographic numbering resources and provide valuable data to inform implementation in other high-growth areas.
2. **Operational Diversity Without ITPA-member Participation** – The Markham exchange is served by a broad mix of carriers, including incumbent local exchange carriers (“ILECs”), competitive local exchange carriers (“CLECs”), mobile wireless carriers, cable-based carriers, and VoIP providers. This includes: Beanfield Technologies, Bell Canada, Comwave Networks Inc. Distributel Communications Limited, Exatel inc., Fibernetics Corporation, FGL Telecom, Innsysvoice corp., Iristel Inc., ISP Telecom Inc., Ixica Communications Inc., Primus Telecommunications Canada Inc., Rogers Communications Canada Inc., Teksavvy Solutions Inc. Telus Communications Inc. and Zayo. This diversity ensures that the full range of provisioning, routing, and porting complexities will be thoroughly tested, while the absence of ITPA members avoids the readiness issues identified in the ITPA Application.
3. **Technical Risk Mitigation** – Conducting the trial in a single, operationally complex exchange allows the industry to identify and address technical challenges in a controlled environment. Lessons learned can then be documented and applied to subsequent exchanges, substantially reducing risk for broader implementation.
4. **Regulatory Certainty** – A phased, exchange-based rollout—beginning with a controlled trial in Markham—achieves the ITPA’s objective of avoiding a disruptive, industry-wide “flash cut” while maintaining momentum toward the Commission’s overall TBP policy objectives.

 **Proposed Trial Parameters**

|  |  |
| --- | --- |
| **Element** | **Proposal** |
| **Start Date** | No earlier than 6 October 2025 subject to carrier readiness and Commission approval issued by 23 September 2025.  |
| **Duration** | Minimum one-month observation period, allowing for at least one “donation” and “assignment” cycle per participating TSP |
| **Participants** | All TSPs serving the Markham exchange |
| **Scope of Pool** | To be discussed by trial participants in coordination with the CNA. (e.g. Use of new codes? By all / certain participants? Could the CNA provide test codes which could be returned if not required longer term by participant?) |
| **Administration** | The Canadian Number Administrator (“CNA”) to manage the pool  |
| **Reporting** | CSCN to report on Trail  |

Following the successful launch and evaluation of the Markham exchange trial, the industry can gradually extend TBP implementation to subsequent exchanges, in phases, where demand warrants TBP and carriers are ready. Outlined below is a proposed phased rollout plan beginning with two phases; specific details regarding the exchanges are provided in Table 1.

Criteria and Rational for Exchange Selection

In order to ensure the test is effective and provides meaningful insight into number conservation, we established specific parameters for exchange selection. Specifically, every exchange deployed within the first year has recorded at least twenty (20) NPA-NXX orders during the 2014–2023 period, as substantiated by contribution file CNCO265B, thereby ensuring that the Trial is concentrated in locations where its impact will be most significant. Mirroring the United States rollout strategy, this criterion directs initial Canadian deployment toward the nation’s highest-volume exchanges, maximizing the likelihood of measurable, positive outcomes, with care taken to exclude from initial rollout phases exchanges that are likely to require readiness by ITPA members or other SNP-TSPs that are unlikely to be ready in the short term. Progression to each subsequent phase (i.e. Phase 1A and B identified in Table 1 below) will be strictly contingent upon successful completion of the preceding phase, which, for these purposes, will be evidenced by (i) formal carrier attestations confirming readiness and the availability of end-to-end testing for all participating carriers in the applicable exchanges, (ii) the absence of any material routing anomalies or adverse customer experiences for a minimum period of three consecutive months following activation, and (iii) no substantiated reports of dual number assignment or impediments to number portability requests during the same three-month observation window. By conforming to these standards, the deployment plan prioritizes high-demand exchanges while safeguarding network integrity and consumer experience throughout the phased implementation.

Phase 1 A (2026-01-06) and B (2026-02-09): launch in at least one Exchange within the largest ILEC territories: Bell (Ontario), SaskTel, Telus (BC).

Table 1 – Phased Rollout

|  |  |  |  |
| --- | --- | --- | --- |
| **Phase** | **Date** | **Exchange**  | **Province** |
| Launch | 2025-10-06 | MARKHAM | ON |
| 1A | 2026-03-01 | ABBOTSFORD | BC |
|   |   | AJAX-PICKERING | ON |
|   |   | BARRIE | ON |
|   |   | BRAMPTON | ON |
|   |   | KELOWNA | BC |
|   |   | MOOSE JAW | SK |
|   |   | OAKVILLE | ON |
|   |   | OSHAWA | ON |
|   |   | THORNHILL | ON |
|   |   | VICTORIA | BC |
|   |   | WINDSOR | ON |
| 1B | 2026-06-09 | OTTAWA-HULL | ON |
|   |   | REGINA | SK |
|   |   | SASKATOON | SK |
|   |   | TORONTO | ON |
|   |   | VANCOUVER | BC |

Future deployment in additional exchanges should follow CNA proposals, as they manage the NRUF at the exchange level. However, as described in contribution CNCO2037A, the decision to establish an Exchange Area Number Pool in any location requires a thousand-block implementation plan filed by CSCN and approved by the CRTC.

**Conclusion**

The Carriers submit that an initial TBP deployment in the Markham exchange is the most pragmatic, least disruptive, and technically sound method to initiate TBP in Canada followed by a phased rollout in subsequent exchanges. This proposal accomplishes the following:

* Balances Industry Readiness – Enables large carriers to proceed while affording SNP-TSPs the additional time sought by the ITPA.
* Generates Actionable Data – Provides the CSCN and the Commission with empirical evidence to refine subsequent phases.
* Preserves Numbering Resources – Addresses the urgent need for conservation measures in a rapidly depleting exchange without compromising national rollout objectives.

We therefore urge the CSCN to adopt the recommendations herein and to advance the Markham exchange trial.