**28 May 2024**

**TIF 118 (Update CSCN-Administered Guidelines for Thousands-Block Pooling)**

**CSCN Conference Call**

**Participants:** David Comrie - COMsolve Inc. (CNA)

Fiona Clegg - COMsolve Inc. (CNA)

Kelly T. Walsh - COMsolve Inc. (CNA)

Natalie Ann Lessard - COMsolve Inc. (CNA)

Stephen Walsh - COMsolve Inc. (CNA)

John Nakamura - 10X People / INC Co-Chair

Joey-Lynn Abdulkader - Bell Canada

Marie-Christine Hudon - Bell Canada

Leo Santoro - Bell Mobility

Rodger McNabb - CLNPC

Bill Barsley - CNAC

Glenn Pilley - CNAC

Anamika Bharti - Cogeco

Ed Antecol - COMsolve Inc.

Alexander Pittman - CRTC staff

Étienne Robelin - CRTC staff

Kim Brown - Eastlink

Vadim Vozian - Eastlink Wireless

Connie Hartman - iconectiv/TRA

Sarah Halko - iconectiv/TRA

Karen Robinson - KROB Numbering Solutions

Jonathan Holmes - ITPA

Florence Weber - NANPA

Marcel Champagne - Neustar/Transunion

Greg Kinloch - NorthWestel

Jennifer Mack - Rogers

Tammy Wilson - SaskTel

Graham LeGeyt - Rogers

Allyson Blevins - Sinch / INC Co-Chair

Diane Dolan - Teksavvy

John MacKenzie - TELUS

Johny Fernandez - TELUS

Jean-Sebastien Tremblay - Videotron

Marc Berruyer - Videotron

James Sewell - Westman Communications

**Welcome:**

Kelly Walsh, as CSCN Chair, welcomed the attendees.

David Comrie, as CSCN Secretary, reviewed the list of attendees.

**Action Item Review:**

1. Participants are asked to investigate internally the desired aging period for telephone numbers in a thousands-block pooling environment. **(Completed)**
2. Carriers are asked to review internally about how to report back on intermediate numbers and, if intermediate carriers should be required to provide number utilization reports. **(Ongoing)**
3. Chantale Neapole will be taking CNCO242A back to the CLNPC organization for review. **(Ongoing)**
4. Chantale Neapole will investigate if the GTT notification process will be impacted with the implementation of thousands-block pooling. **(Ongoing)**
5. Participants are asked to review the recommendations in CNCO241A internally and provide a response to CSCN. **(Ongoing)**
6. Fiona Clegg will look into whether or not companies that operate as a CLEC and a reseller will need two separate OCNs for submitting NRUFs and number utilization reports. **(Completed)**
7. Participants are asked to provide comments on the months-to-exhaust process. **(Ongoing)**

**Discussion:**

Jennifer Mack noted that the Rogers’ recommendation is that NRUF forecasting continue to be done annually instead of semi-annually.

Ed Antecol noted that he is concerned about doing forecasting once every 12 months instead of 12 months of forecasting every 6 months.

Ed Antecol noted he has included a proposed definition for intermediate TNs in CNCO241A which should address Marie-Christine Hudon’s question about a definition for Intermediate Carrier.

Jennifer Mack presented CNCO249A.

Ed Antecol noted that reporting of utilization and using it as a criterion is an important way to know if carriers are using their resources appropriately. He noted there is an option for Carriers, if they need to get more numbers than their 25% inventory, to submit a request to the CRTC. A 25% spike in a Carrier’s inventory would be a significant increase over a Carrier’s full inventory.

Leo Santoro indicated that by using the current Appendix B for code/block requests, you can extract all the information required to ascertain whether more blocks are required.

Ed Antecol noted that the current Appendix B is not accurately providing evidence that numbers are being used.

Leo Santoro noted that on the Appendix B, a Carrier says how many numbers they have assigned over the last 6 months and then how many numbers they have left over.

Ed Antecol noted that those numbers are not auditable.

Leo Santoro noted that it’s presumptive to say that the current Appendix B is inefficient.

Ed Antecol noted that under the current model, the numbers that carriers are issuing to intermediate carriers are being counted as assigned and in-use.

Karen Robinson noted that in some rate centers, a carrier can have multiple POIs. If a carrier has less than 75% utlilization, it does not necessarily mean that those numbers are available to consumers. So, if a POI is identified internally by an SP for a specific network, those available numbers that deem it less than 75% utilized may not be included. Service providers need to be able to leave themselves room to conduct business and accommodate unexpected demand.

Ed Antecol noted that he only proposed the 75% threshold based on utilization reporting. In order to do the utilization reporting, then forecasting needs to be at an Exchange level. Otherwise, you create incentive to create new POIs. If you’re going to do utilization reporting and hold carriers to a uniform 75%, then the utilization reporting needs to be auditable.

Leo Santoro noted that if we report back at the Exchange level, it’s more realistic and does prevent the incentive of opening additional POIs simply for the purpose of getting more numbers.

Ed Antecol asked if there was any objection to utilization reporting being part of the NRUF. Bell and KRob Telecom Solutions noted that they have no objection to including utilization reporting in the NRUF.

Ed Antecol asked if there was an intention to change the Appendix B so that it is always completed at the Exchange Area level? It is currently done at either the Exchange Area level or by POI.

John Mackenzie noted that TELUS is reserving comment currently.

Étienne Robelin asked if the proposed changes in CNCO249A are going to become a separate report or are they going to override 248A. Kelly Walsh noted that the proposal is that 249A is a response to some of the items in 248A and so, if the group agrees, then the suggestions in 249A should be integrated into the recommendations in 248A and become an iterative version of the report called 248B.

Ed Antecol noted that, based on his understanding of the proposal in 249A, if a carrier indicates in their Appendix B that they have 35% utilization but have a months-to-forecast saying they will need more numbers, the CNA will have no grounds to refuse the assignment of numbers.

Ed Antecol noted that one-year forecasts tend to overstate demand. Today we have annual forecasts. How do you want us to build the controls around the pools?

Jennifer Mack asked, wouldn’t a carrier have to make a request for a code to keep the pool stocked. Ed Antecol noted that the PA cannot stock the pool on its own but can create incentives for Carriers to request codes to stock up the pool.

Allyson Blevins noted that in the US they do NRUFs twice per year. Allyson Blevins noted that, with the state of the NANP currently, it might be advantageous to do forecasting every 6 months instead of 12 months. Florence Weber asked about the forecast as it relates to pool replenishment. Ed Antecol asked if there is a benefit to doing 6-month forecasts for the benefit of the NANP. Florence Weber noted that 6-month forecasts would help with assessing the overall NANP exhaust since, in the US, they assess it every 6 months, but Canadian data is only provided on an annual basis.

Ed Antecol noted that there are reasons for both semi-annual and annual forecasts.

Ed Antecol suggested that if someone wants NRUFs to be conducted annually, then they will need to submit a contribution. Jennifer Mack noted that she will submit a contribution.

Action Item: Jennifer Mack will submit a contribution incorporating the proposed changes of CNCO249A into the draft report (CNCO248A) as well as changes to the NRUF frequency requirements.

Kelly Walsh noted that the CSCN is overdue on a report to the CRTC related to paragraph 51. The CSCN Chair has submitted a request for extension to the CRTC but the expectation is that the CSCN will have a near final report ready for review at CSCN 129.

Leo Santoro asked for an explanation of Assigned TNs. Ed Antecol noted that if telephone numbers are given to a reseller, unless they are in-service, they are considered as intermediate TNs.

Action Item: Ed Antecol will consider providing a definition for “end user”.

The group reviewed CNCO248A.

Leo Santoro asked, if we have a reseller and they have an OCN, would the reseller be submitting their numbers in their own NRUF. Ed Antecol noted that the current proposal is not to require resellers to obtain an OCN, but that resellers submit their data to the Block Holder.

Leo Santoro asked if a reseller can get their own resources from the CNA directly. Ed Antecol responded that resellers are not able to get telephone numbering resources directly from the CNA.

Ed Antecol noted that the current proposal means that numbers given to a reseller must be identified as in-service by the reseller to the block holder or else it might trigger an audit.

Ed Antecol noted that he believes utilization reporting should be requested at least once before the implementation of thousands-block pooling.

A meeting was scheduled for Thursday, 6 June 2024 from 10:00 – 12:00 ET.

Action Item: David Comrie will send out a meeting invitation for Thursday, 6 June 2024 from 10:00 – 12:00 ET. (**Completed)**

**Summary of Agreements Reached:**

None.

**Summary of Action Items:**

1. Carriers are asked to review internally about how to report back on intermediate numbers and, if intermediate carriers should be required to provide number utilization reports. **(Ongoing)**
2. Chantale Neapole will be taking CNCO242A back to the CLNPC organization for review. **(Ongoing)**
3. Chantale Neapole will investigate if the GTT notification process will be impacted with the implementation of thousands-block pooling. **(Ongoing)**
4. Participants are asked to review the recommendations in CNCO241A internally and provide a response to CSCN. **(Ongoing)**
5. Participants are asked to provide comments on the months-to-exhaust process. **(Ongoing)**
6. Jennifer Mack will submit a contribution incorporating the proposed changes of CNCO249A into the draft report (CNCO248A) as well as changes to the NRUF frequency requirements.
7. Ed Antecol will consider providing a definition for “end user”.
8. David Comrie will send out a meeting invitation for Thursday, 6 June 2024 from 10:00 – 12:00 ET. (**Completed)**

**Attachments:**

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CNCO249A - Rogers/Bell/KRob Solutions contribution - TIF 118 - Recommendations on timeline and utilization for ordering numbering resources



CNCO248A - COMsolve contribution - TIF 118 - Draft paragraph 51 report