**6 June 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)

Stephen Walsh - COMsolve Inc. (CNA)

John Nakamura - 10X People / INC Co-Chair

Joey-Lynn Abdulkader - Bell Canada

Marie-Christine Hudon - Bell Canada

Wanda Mali - Bell Canada

Leo Santoro - Bell Mobility

Chantale Neapole - CLNPC

Rodger McNabb - CLNPC

Bill Barsley - CNAC

Glenn Pilley - CNAC

Anamika Bharti - Cogeco

Ed Antecol - COMsolve Inc.

Alexander Pittman - CRTC staff

Étienne Robelin - CRTC staff

Sarah Reilly - Distributel

Nicholas Bayly - Freedom Mobile

Sarah Halko - iconectiv/TRA

Michael Doherty - iconectiv/US NPAC

Karen Robinson - KROB Numbering Solutions

Tara Farquhar - NANPA

Marcel Champagne - Neustar/Transunion

Darryl Evans - Quadro Communications

Jennifer Mack - Rogers

Michael Studniberg - Rogers

Tammy Wilson - SaskTel

Allyson Blevins - Sinch / INC Co-Chair

Diane Dolan - Teksavvy

John MacKenzie - TELUS

Olena Bilozerska - 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. 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 an item to discuss with stakeholders about when the NPAC will be ready for testing. **(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 (Semi-annual forecasting requirements) 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. **(Ongoing)**
7. Ed Antecol will consider providing a definition for “end user”. **(Completed)**

**Discussion:**

Ed Antecol presented FCC Form 502. He noted that it’s filed semi-annually and it is used for relief planning. The Canadian NRUF is equivalent to the Form 3b. For each NPA or NPA Complex, they are providing a 5-year forecast. In his proposal, for areas that are not going to be part of pooling within a defined period of time, Canada should continue to use the NRUF as is by forecasting number of CO Codes over a number of years. The consensus seems to be that some areas will not have TBP implemented.

Allyson Blevins noted that her company does not fill out any of the F2 or F3 forms. Companies only fill out Form 3 when they only operate in areas without pooling.

Ed Antecol noted that for certain NPAs where we are not planning to do number pooling for a certain time horizon, we would continue to do forecasts at the NPA-level. Areas like NPA 867 can be left at the NPA complex for forecasts.

Ed Antecol noted that when a new CLEC comes along in some of the rural areas, they would need a new CO Code under the current rules. A new carrier can’t just get a 1K block from the pool. Whenever you go into a new Exchange Area, you need to go and get an initial CO Code. In addition to the Form 3b, there’s a Form 3a which is the number of initial codes. Canada does not currently have an equivalent to that in their NRUFs.

Ed Antecol noted that, in the pooled areas in the US, they forecast at the number 1K blocks per Rate Center.

Ed Antecol noted that the current proposal is to have the NRUF forecasting conducted at the Exchange Area level and there would be a forecast for each Exchange Area. In addition to forecasting the number of 10,000 blocks, how many initial 1K blocks will you need because those initial blocks will require a whole CO Code be added to the Exchange Area.

Tara Farquhar noted that F3A and F3B are only for countries that do not participate in pooling. Ed Antecol noted that what he is proposing is that a Form 3B equivalent be used in Canada for NPA complexes like 867 until pooling is expected to be implemented (which may be never).

Marie-Christine Hudon asked if Ed Antecol is expecting that everyone agrees with each of the things he is proposed right now. Ed Antecol noted that he is just outlining what he has proposed and then when the committee drafts the report, the carriers can provide their input and agree/disagree.

Ed Antecol noted that the Appendix 4 to the TBCOCAG is a 1 year forecast showing the 12 separate months of growth. There is also a section for footprint CO Codes where Carriers will need to request a CO Code to establish an LRN.

Ed Antecol suggested that in Canada, we can use one form that has forecasting for the first 12-months, monthly, and then provide annual forecasting for the subsequent years.

Ed Antecol noted that when you request individual blocks, there could be 10% contamination in each block. If you need 10 blocks, that’s 1000 numbers you need to manually exclude.

Allyson Blevins noted that the NRUF we were just looking at with the F1B data, that data does not populate what Ed is showing on the screen. What Ed is showing is what gets populated in the PAS.

Allyson Blevins noted that she is not sure how many carriers fill out the paper form forecasts. Ed Antecol noted that an online submission would be ideal but he is showing the form conceptually because the Canadian guideline need to be changed.

Allyson Blevins noted that she disagrees with Ed that it’s a lot of work to deal with contamination. For her personally, companies she works with are getting regular updates from the NPAC but the amount of work is really dependent on each service providers’ system. Ed Antecol noted that not all Canadian carriers have inventory systems that are tied to LSMS and they do LNP dips but they are only doing the dips in their call processing flow.

Allyson Blevins noted that the amount of additional work to deal with contamination will be dependent on the carrier’s inventory management system.

Ed Antecol noted that the deadline for a CLEC, once a launch takes place, is to be ready to take blocks from the pool which may or may not be contaminated.

Leo Santoro asked, if the suggestion being made is that in Canada, we deviate from the US and do forecasting every 12 months. Ed Antecol noted that in the US, they do 12 months of forecasting every 6 months.

Tara Farquhar noted that in the US they take the forecast form via the GUI or SFTP and it’s required to be completed semi-annually at the same time as the NRUF but a carrier, if they want to make a change, can come in and make the change at any time. In the US they use the aggregated data to make a pooling NRUF.

Allyson Blevins noted that a major part of how it works is that a carrier is blocked from getting new codes if they do not match their forecasts and they will need to submit an updated forecast before they can get new codes.

Tara Farquhar noted two of the reasons for doing the 6-month forecasts is that it lines up with the NRUF and it also helps keep the pools replenished.

Ed Antecol noted that at the end of the day, we need to decide if we are moving to semi-annual or annual forecasting. His preference is to have the reporting done semi-annually to give the system the flexibility to properly forecast the 6-month demand.

John Nakamura noted that if you are only doing your forecast for 12 months annually, once you get to July, you won’t be able to get an accurate 6 month forecast because you only have 5 months worth of data remaining.

Leo Santoro asked if Ed Antecol is asking for the industry to vote right now or take it back. Ed Antecol noted that he’s not asking for a consensus today but he hopes that carriers are able to decide what they want and then we can decide if it’s a consensus or non-consensus and capture the position at next weeks CSCN plenary session. It was noted that the paragraph 51 report must be completed and submitted to the CISC by June 26.

Agreement was reached to review CNCO248B despite it not being made available before the meeting.

Jennifer Mack presented CNCO248B.

Jennifer Mack noted that they removed the recommendation of limiting code requests when utilization is below 75%.

Ed Antecol noted that with the removal of the 2 recommendations, the only check is that the CNA is going to look at the NRUF utilization reports. Beyond that the only control that will exist is when CRTC requests that a company conduct an audit.

Leo Santoro noted that the PA will still have a tool to identify poor utilization based on the NRUF submission.

Ed Antecol noted that if the utilization reporting is only in the NRUF utilization reports, it places a greater onus on Commission staff.

Ed Antecol noted that in the Appendix B today, we determine the total number of resources you have in an Exchange Area, we can see in your Appendix B what you have available and what is required. The utilization he’s talking about is how many numbers are assigned to an end-user. Of the million numbers the carrier has, how many are assigned to end-users. To measure the efficiency of number utilization the CNA needs to know how many numbers are assigned to end-users. The current Appendix B doesn’t have the utilization information at that level.

Ed Antecol noted that not knowing how many numbers are assigned to end users will look bad for carriers whose business is to get numbers for someone who is not able get numbers for themselves. It will look bad if you can’t get utilization details from those resellers.

Jennifer Mack noted that the utilization data will be valuable but it will also require a lot more work from at least her own carrier to get all that data in one report.

Karen Robinson noted that she will be submitting a contribution about efficient number usage to be included in the paragraph 51 report.

Ed Antecol noted that the report should include some best practice about efficient number usage.

Kelly Walsh noted that the contribution can be incorporated in the paragraph 51 report.

Chantale Neapole noted that some comments about CLNPC in a previous meeting may have been problematic as they may have been construed as dictating what the CLNPC needs to do.

Kelly Walsh noted that the language used may have been more prescriptive than appropriate but the intention was not to dictate what the CLNPC needs to do but rather for functionalities the PA may need to arrange to perform their duties related to Thousands-Block Pooling.

Ed Antecol noted that there are a number of places where reports or checks are required and in some cases, where are carrier has gone out of business there is no one that can provide data and so the PA may be required to get the data from NPAC.

Ed Antecol noted that all of the recommendations included in his report are based on how the NPAC functions in the US so they are not completely new things.

Kelly Walsh noted that CNCO248B will be posted, as well as the contribution from Karen Robinson when it arrives and we can try to finalize the paragraph 51 report at CSCN 129.

Kelly Walsh noted that CSCN 129 is scheduled for 11-12 June 2024.

Action Item: David Comrie will post CNCO248B on the CSCN Drafts page. **(Completed)**

Action Item: Karen Robinson will provide a contribution about efficient number usage.

**Summary of Agreements Reached:**

None.

**Summary of Action Items:**

1. David Comrie will post CNCO248B on the CSCN Drafts page.
2. Karen Robinson will provide a contribution about efficient number usage.

**Attachments:**

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Rogers/Bell/Krob Solutions contribution – TIF 118 – Draft paragraph 51 reports