**25 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)

Natalie Ann Lessard - COMsolve Inc. (CNA)

Stephen Walsh - COMsolve Inc. (CNA)

Jeanne Bell - Allstream/Zayo

Joey-Lynn Abdulkader - Bell Canada

Marie-Christine Hudon - Bell Canada

Wanda Mali - Bell Canada

Leo Santoro - Bell Mobility

Rodger McNabb - CLNPC

Bill Barsley - CNAC

Glenn Pilley - CNAC

Anamika Bharti - Cogeco

Ed Antecol - COMsolve Inc.

Étienne Robelin - CRTC staff

Sarah Halko - iconectiv/TRA

Karen Robinson - KROB Numbering Solutions

Jonathan Holmes - ITPA

Florence Weber - NANPA

Marcel Champagne - Neustar/Transunion

Jennifer Mack - Rogers

Diane Dolan - Teksavvy

John MacKenzie - TELUS

Olena Bilozerska - TELUS

Marc Berruyer - Videotron

Gabriel Picard Mandeville - Quebecor

**Welcome:**

Kelly Walsh, as CSCN Chair, welcomed the attendees.

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

**Action Item Review:**

1. James Sewell will identify the recommendation for carriers to begin implementing sequential numbering and block assignments prior to the implementation of the thousands-block pooling. **(Ongoing)**
2. David Comrie will post 2 versions of the current contribution as CNCO248H: one with all the changes accepted as the main version and one version with all the changes still showing. **(Completed)**

**Discussion:**

Kelly Walsh noted that the report the committee has been working on (current version CNCO248H) is due to be sent to the CISC on 26 June 2024, per CRTC direction.

Kelly Walsh asked which version of CNCO248H the group wanted to review: Marked up or clean.

Agreement was reached to review the clean version of CNCO248H.

The group began working on CNCO248H.

Action Item: David Comrie will search the report for references to the “PA” and replace it with “CNA” where appropriate. **(Completed)**

Karen Robinson noted that in the wireless world, numbers are assigned in real time. Once the number is activated, it moves from Reserved to Assigned.

Ed Antecol showed the Thousands-block Months-to-Exhaust spreadsheet used in the US.

Florence Weber noted that the FCC has put rules in place to exclude numbers assigned in the last 90 days from utilization when applying for a new thousands-block but numbers assigned in the last 90 days are included in the Months-to-Exhaust calculation. Service Providers can’t maintain more than a 6-month inventory in the US so they are certifying that they are going to need numbers in 6 months or less.

Florence Weber noted that numbering resources assigned in 90 days or less, are excluded from the Assigned category but are included in the Available numbers category in the utilization calculations for requesting additional numbering resources.

Kelly Walsh asked Florence Weber if all companies in the US with low utilization are required to submit a waiver to NANPA if they are applying for additional codes, even if they only have 1 thousands-block with 500 numbers assigned. Florence Weber noted that that is correct.

John MacKenzie asked if it would be reasonable to include some sort of report by the CNA of all the instances where the CNA has waived the 75% utilization requirement.

Étienne Robelin noted that with the interim order currently in place, the CNA doesn’t have to make their own judgement call about whether or not to include a waiver. It just gets handed to the CRTC when the company exceeds their forecast.

John MacKenzie noted that currently we do not know how many waivers will be required for requests that are below the 75% utilization threshold.

Étienne Robelin noted that the Commission doesn’t really like subjectivity in its rules and so the CRTC might not be comfortable with just giving the CNA the right to grant exceptions without some criteria. The Commission might require some clear criteria for when the CNA can grant waivers.

Karen Robinson noted that maybe when a carrier is requesting numbers when their utilization is below 75%, they can submit it to the CRTC staff and CNA at the same time.

Karen Robinson noted that depending on the timing of the application going to the CRTC, Utilization may change by the time they are deciding about the request. Is the CRTC going to be considering the current utilization or the utilization as of the time of the application?

Leo Santoro noted that 75% utilization on the Appendix B is just a part of the Appendix B. It should be considered as a whole and there is additional information on the Appendix B including Months-to-Exhaust. The CNA should be able to make a judgement call on whether the provided information is acceptable.

Ed Antecol noted that the Canadian industry has never done a utilization survey at this level. He’s worried it could be destabilizing for a company if they have to keep going to the Commission. It could be that the CNA will include a tally of the number of waivers granted and it could be that later down the line, the waivers are not really needed.

Étienne Robelin noted that if the CNA discretion aspect is meant to only apply on edge cases, then those would, by definition, be rare in which case the CRTC staff can just handle those exceptions.

Étienne Robelin noted that the interim measure currently in place appears to be working well from his perspective and that process includes submitting a letter to the Secretary General of the CRTC.

The following language was being considered:

Submit utilization, but do not apply a utilization criterion until after the industry has some experience. 18 months after the first G-NRUFs have been filed with utilization reporting, then impose a utilization criterion that only CRTC staff can waive.

Representatives from the following organizations agreed with the approach above:

Rogers

Videotron

Bell

TELUS

Teksavvy

Cogeco

Allstream/Zayo

John MacKenzie placed some language in chat for consideration in section 3 of the report:

The recommendations in Section 2.1 (specifically the definition of Unassigned/Unreported Resold TNs) create an incentive for carriers to go back to the wholesale customers to whom they are providing numbering resources and obtain specific utilization information. Failure to do so will cause the carrier’s reported utilization to be lower than it might otherwise be.

However, responding to this question as written would necessarily involve policy considerations that are outside the scope of CISC. Accordingly, the CSCN respectfully declines to provide a response.

A meeting was scheduled for 26 June 2024 from 10:00 – 13:00 ET.

Action Item: David Comrie will attach a TIF Report cover page and post the working version of CNCO248H as CNCO248I. **(Completed)**

Action Item: David Comrie will send out a meeting invitation for 26 June 2024 from 10:00 – 13:00 ET. **(Completed)**

**Summary of Agreements Reached:**

Agreement was reached to review the clean up version of CNCO248H.

**Summary of Action Items:**

David Comrie will search the report for references to the “PA” and replace it with “CNA” where appropriate. **(Completed)**

David Comrie will attach a TIF Report cover page and post the working version of CNCO248H as CNCO248I. **(Completed)**

David Comrie will send out a meeting invitation for 26 June 2024 from 10:00 – 13:00 ET. **(Completed)**

**Attachments:**



CNCO248H - CSCN contribution - TIF 118 - Draft report (NO MARKUP) for paragraph 51 from Telecom Regulatory Policy 2024-26 (incl. in-meeting changes)