



Telecom Decision CRTC 2021-217

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CISC Canadian Steering Committee on Numbering – Consensus report CNRE126A – Revised Appendix B, *Canadian NPA Relief Planning Timeline*, to the Canadian NPA Relief Planning Guideline

The Commission **approves** a revised Appendix B to the Canadian Relief Planning Guideline (the Guideline) in order to reduce the timeline for the implementation of area code relief from 72 months to 36 months. The Commission also requests the Canadian Steering Committee on Numbering to file a version of the Guideline that includes scenarios for the declaration of a jeopardy condition that reflect the 36-month timeline for relief implementation.

Background

1. When a new area code is introduced in Canada, the process is governed by the [Canadian NPA Relief Planning Guideline](#) (the Guideline). In accordance with the Guideline, relief planning for an area code or area code complex¹ is initiated when the Canadian Numbering Administrator (CNA) advises the Commission that its projected exhaust date is within the relief planning window.² The Commission issues a notice of consultation to establish a relief planning committee (RPC), which follows the relief planning process and timeline set out in Appendix B of the Guideline. The RPC analyses the type of area code relief required, develops a relief implementation plan, and makes recommendations on these matters to the Commission for its approval.
2. The Guideline sets out a number of steps, milestones and processes for the analysis, planning and implementation of new area codes. It covers such topics as:
 - the assumptions and constraints applicable to area code relief planning;
 - the principles that guide area code relief planning;
 - an overview of the relief methods to be considered by a RPC;
 - the transition from 7-digit local dialing to 10-digit local dialing;³

¹ An area code complex is created when two or more area codes serve the same geographic area.

² Under the current timeline, relief planning is initiated at 72 months before the projected exhaust date.

³ Most areas in Canada already have mandatory 10-digit local dialing or can accept local calls dialed as 10-digits.

- roles and responsibilities for relief planning;
 - the relief planning process;
 - the conditions that can cause a jeopardy condition,⁴ and a jeopardy condition plan that would be invoked in the event that a jeopardy condition is declared;
 - maintenance of the Guideline; and
 - appendices that include templates of the various documents used during relief planning and implementation.
3. In view of the telecommunications industry's experience in implementing numerous new area codes in Canada, the Canadian Steering Committee on Numbering (CSCN) recognized that it would be productive to update the Guideline to streamline some of the methodologies and template forms used during area code relief planning and implementation.
 4. One of the drivers for the simplification of the relief planning process was the issuance of *CISC Canadian Steering Committee on Numbering – Consensus report CNRE124A regarding the streamlining of the relief planning process*, Telecom Decision CRTC 2019-24, 29 January 2019, in which the Commission approved a CSCN recommendation to eliminate the consideration of concentrated area code overlays and boundary extensions from the relief planning analysis. With relief methods limited to a few variations of distributed area code overlays, the forecasting and relief planning processes can be simplified accordingly.
 5. In June 2019, the CSCN initiated Task Identification Form ([TIF](#)) 105 to review the relief planning and number forecasting processes associated with overlay area code complex relief. The TIF had four objectives:
 - a) to eliminate the requirement to conduct numbering resource utilization forecasts at the exchange level;
 - b) to shorten the timeline for relief planning and implementation;
 - c) to develop a process for quick turn-around on postponement of relief implementation when a projected exhaust date is significantly deferred; and
 - d) to standardize planning and implementation documentation.

Report

6. On 24 July 2020, the CRTC Interconnection Steering Committee (CISC) approved and forwarded to the Commission, for its approval, the following CSCN consensus TIF report:
 - Revised Appendix B, *Canadian NPA Relief Planning Timeline*, to the Canadian NPA Relief Planning Guideline, 3 July 2020 (CNRE126A)

⁴ A jeopardy condition is a situation where the assignable pool of central office codes is forecasted to exhaust before a new area code can be implemented.

7. The report can be found in the “Reports” section of the CSCN page, which is available in the CISC section of the Commission’s website at www.crtc.gc.ca
8. The report addresses the objective of shortening the timeline for relief planning and implementation.
9. The report proposes a revised Appendix B to the Guideline that reflects the CSCN’s recommendations.
10. The CSCN noted that, when a distributed overlay area code is introduced in an already existing area code complex, the time allotted for the completion of some of the steps required for relief implementation could be reduced.
11. The report states that, because alternatives to a distributed overlay area code are no longer considered, the time allocated in the first 16 steps is no longer necessary. The current time allotted from the initiation of relief planning until the Commission issues a decision on a planning document and relief implementation plan and the North American Numbering Plan Administrator issues a planning letter is 22.5 months. The CSCN recommended that this time period be shortened to 12.5 months by reducing the time allowed for the industry to agree on documentation and by creating a single step for the submission of the planning document and relief implementation plan to the CISC Steering Committee and the Commission for their approval.⁵
12. The CSCN recommended that the time allotted for the execution of the consumer awareness plan and relief implementation be reduced from 37.5 months to 17.5 months.
13. Further, the CSCN noted that in areas where 10-digit local dialing is already in place, the three-month period allotted for the transition from 7- to 10-digit local dialing is not required.
14. The current timeline requires telecommunications service providers to file their individual communications plans with the Commission 23 months in advance of the relief implementation date, and to initiate customer communications 18 months in advance of that date. The CSCN recommended that these time periods be shortened to nine months and six months respectively, within a proposed time period of 17.5 months.
15. Currently, relief is to be implemented 12 to 18 months before the projected exhaust date. The CSCN recommended that this time period be reduced to approximately six months.
16. The CSCN recommended that the Commission approve the revised Appendix B- Canadian NPA Relief Planning Timeline in the Guideline.

Commission’s analysis and determinations

17. The current relief planning timeline was developed at a time when area code relief planning was not a common occurrence, and was a more complex process than now because RPCs were required to analyze a number of different relief methods.

⁵ CISC and CRTC approval are currently separate steps.

18. Network implementation has also become simpler. With three exceptions, all area codes in Canada are already area code complexes with single or multiple overlay area codes.⁶ Thus, less time is now required to make network changes for the introduction of a new overlay area code.
19. Consumer awareness requirements are also much simpler, because where overlay area codes are already in use, consumers are used to ten-digit dialing for local calls; the only change is the introduction of a new area code number.
20. The original requirement for the relief date to be 12 to 18 months in advance of the projected exhaust date was considered necessary in order to allow for fluctuations in that date, which would occur during the lengthy time period allotted to network changes and consumer awareness programs,. However, if less time and effort are required in preparatory work, the relief date can be closer to the projected exhaust date.
21. The Commission considers that a lengthy relief planning and implementation period creates uncertainty and unnecessary work for the telecommunications industry, particularly when fluctuations in the projected exhaust date necessitate revisions to the planning document and relief implementation schedule. The Commission, therefore, considers that a shorter planning and implementation period for providing area code relief would benefit all parties involved.

Conclusion

22. In light of the above, the Commission *approves* the report and the revised Appendix B to the Guideline.

Jeopardy Condition

23. The Commission also notes an issue concerning the Guideline that is not mentioned in the report and will require action from the CSCN. The issue regards Section 9 – Jeopardy Condition.
24. Specifically, Section 9.1 – Purpose, includes a table that sets out different scenarios under which a jeopardy condition would be declared, based on a relief planning and implementation timeline of 72 months.
25. Because the revised Appendix B to the Guideline reduces the relief implementation timeline to 36 months, the timing related to the jeopardy condition scenarios must be adjusted or reconsidered.
26. The Commission therefore requests the CSCN to adjust the jeopardy condition scenarios in Section 9.1 of the Guideline in accordance with a 36-month timeline for relief implementation and to file a revised version of the Guideline with the Commission for its approval.

⁶ The three exceptions are area codes 807 (northern Ontario) and 867 (Northwest Territories), which are not expected to exhaust until beyond 2040, and 709 (Newfoundland), for which relief planning for a distributed overlay area code has already been approved, but was on hold until recently.

Policy Direction

27. In accordance with subparagraph 1 (b)(1) of the 2006 Policy Direction,⁷ the Commission considers that approval of the report will advance the policy objective set out in paragraphs 7(a) and (f) of the *Telecommunications Act*.⁸
28. In accordance with the 2019 Policy Direction,⁹ the Commission considers that its decision can promote competition, affordability, and consumer interests by providing streamlined and efficient processes related to the administration and use of Canadian numbering resources.

Secretary General

⁷ *Order issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives* SOR/2006-355, 14 December 2006

⁸ The cited policy objectives are: 7(a) to facilitate the orderly development throughout Canada of a telecommunications system that serves to safeguard, enrich and strengthen the social and economic fabric of Canada and its regions, and 7(f) to foster increased reliance on market forces for the provision of telecommunications services and to ensure that regulation where required is efficient and effective.

⁹ *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives to Promote Competition, Affordability, Consumer Interests and Innovation*. SOR/2019-227, 17 June 2019.