

Excerpt from Telecom Regulatory Policy CRTC 2021-130
(full text available here: <https://crtc.gc.ca/eng/archive/2021/2021-130.htm>)

Changes to the IMSI Guidelines

Background

611. The Canadian Electricity Association (CEA) and the Railway Association of Canada (RAC), which represent electrical utilities and railway operators respectively, requested that the Commission direct the CISC Canadian Steering Committee on Numbering (CSCN)^{Footnote 53} to revise the International Mobile Subscription Identity [IMSI] Assignment Guideline (IMSI Guideline) to allow critical infrastructure operators (CIOs) to acquire mobile network codes (MNCs).

Positions of parties

612. The CEA and the RAC submitted that negotiating access to individual existing mobile wireless networks is no longer meeting their members' needs, and that it is critical that they get access that will meet their evolving connectivity requirements. For example, they submitted that their membership will require increased broadband connectivity to accommodate millions of IOT and M2M devices to be used in their members' operations in the coming years, as well as in applications like smart electricity grids.

613. They further explained that having MNCs would mean that their members would not need to depend on a single wireless carrier for RAN access. Instead, they could rely on many networks, including those of wireless carriers, the Public Safety Broadband Network (PSBN),^{Footnote 54} or others, possibly in conjunction with CIO-deployed networks. With their own core networks, CIOs would be able to operate an integrated network using their own MNCs, which would be distinct from, and, in their view, more reliable than, the individual networks on which they currently depend for RAN access. In addition, CIOs would be able to route their own communications through their own core networks, which they considered to be more secure than commercially available options.

614. Wireless carriers were generally of the view that the current proceeding is the wrong forum for this request and that the needs expressed by CIOs could largely be addressed by the carriers' existing commercial offerings in the market.

615. Shaw also expressed concern about granting MNCs to CIOs, given the limited number of MNCs available. It submitted that granting the request could lead to other industries seeking MNCs, which could quickly exhaust the remaining MNC supply.

616. In reply, the CEA and the RAC reiterated that their members' needs have not been met in the market, and that there is a strong case justifying this narrow extension of access to MNCs. Nevertheless, in recognition of the scarcity of this resource, the CEA proposed several possible limitations, such as MNC sharing among members of a CIO group. They argued, however, that these limitations could affect how their members put their services into operation.

Commission's analysis and determinations

617. The Commission considers that granting the CEA and the RAC's request would have clear benefits to the public interest, because it would lead to more reliable, innovative, and integrated networks for CIOs. However, MNCs are a finite resource that must be allocated carefully and used responsibly.
618. As a result, the Commission considers that the CSCN should explore ways to allocate MNCs to CIOs, with a view toward striking the appropriate balance between network complexity and efficiency, while mitigating the potential risk to MNC supply, and make a recommendation to the Commission in this regard.
619. Accordingly, the Commission requests that the CSCN (i) explore the best way to allocate MNCs efficiently to CIOs, (ii) amend the IMSI Guideline to allow CIOs to acquire MNCs, and (iii) submit the amended IMSI Guideline for Commission approval within **120 days** of the date of this decision.