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4. NPA RELIEF METHODS

Once the necessity for NPA code relief was established, all NPA code relief methods were considered. The following paragraphs provide definitions and general attributes of the Geographic Split, Overlay Method, Boundary Realignment and a brief description of the Technology-specific Overlay.

4.1 *Geographic Split*

4.1.1 *Definition*

By this method, the exhausting NPA is split into two or more geographic areas with similar-size requirements for numbering resources, with one area retaining the existing NPA code, and the other(s) being assigned a new NPA code(s). To minimise the quantity of number changes, the area with the largest number of customers usually retains the existing NPA. Boundaries between old and new NPA(s) may follow natural, physical or jurisdictional boundaries based on geographical features where such alignments are suitable. Boundaries are chosen to avoid splitting Exchange Areas.

This method generally provides long-term relief for an area.

4.1.2 *General Attributes*

- *A known method of NPA relief, last implemented in Canada in 1999.*
- *7-digit dialling is retained for local calls within NPAs.*
- *If CO Code protection is not implemented, 10-digit dialling is required for local calls between different NPAs.*
- *Number changes required within new NPA boundaries.*
- *the time required to transition to a new NPA with a split is usually longer than the time needed to transition to mandatory 10-digit dialling for a first-time overlay.*
- *Reprogramming or replacement of equipment (switches, PBXs, cellular phones, etc.).*
- *Some existing customers inconvenienced.*
- *More economic burden (businesses, public costs, stationery, etc.).*
- *May not be as expensive to display in telephone directory.*
- *Requires a permissive dialling period.*
- *Possible boundary disputes.*

4.2 *Overlay*

4.2.1 *Definition*

An NPA overlay occurs when more than one NPA code serves the same geographic area. Opening up a new NPA code provides code relief when the existing NPA is exhausted. Numbers from the new NPA are assigned for new growth on a carrier neutral basis, i.e., first-come first-served. This method necessitates 10-digit dialling of local calls between the old and new NPAs coincident with NXX codes being implemented in the new NPA (universal 10-digit

dialling for all local calls eliminates customer confusion). It has also been established that any 7-digit local calling from adjacent areas into the overlay area must be converted to 10-digit dialling at the time of relief. Exceptions to this policy may be considered if there is a need for continued code protection (i.e., for 7-digit local dialling across an NPA boundary).

The Distributed Overlay strategy may be considered in situations when growth in telephone numbers is expected to be more or less evenly distributed throughout the existing NPA requiring relief. The new NPA is "overlaid" on top of the NPA requiring relief and covers exactly the same geographic boundaries.

A Concentrated Overlay strategy may be considered in situations where the majority of the demand for new telephone numbers is expected to be concentrated in one section of an existing NPA. For example, a fast growing metropolitan area and a sparsely populated rural area could be covered by the same NPA. The new NPA would be assigned initially to the section of the original NPA experiencing the greatest growth (e.g., the metropolitan area), and any need for new CO Codes in that section would be met by the assignment of CO Codes from the new NPA. In the area not covered by the new NPA, any future need for new CO Codes would be met by the assignment of CO Codes from the original NPA. In order to ensure that sufficient CO Codes are available for assignment from the original NPA to that section not covered by the new concentrated overlay, it is important for the new concentrated overlay to be implemented sooner than with other solutions.

In some cases CO Code assignment monitoring and CO Code conservation measures may have to be implemented prior to the introduction of the new Concentrated Overlay in order to ensure that sufficient CO Codes in the original NPA are available. When relief is required in other sections of the original NPA, the geographic coverage area of the new NPA could be expanded. In some cases, more than one Concentrated Overlay could be implemented to cover different sections of a single existing NPA.

Since 1995 the majority of NPA reliefs in Canada have used the Overlay Method (concentrated or distributed).

4.2.2 General Attributes

- *A known method of NPA relief most recently implemented in Canada in parts of Ontario and Québec in 2006.*
- *Requires mandatory 10-digit local dialling throughout the NPAs being relieved, and generally from adjacent NPAs into NPAs being relieved, usually at the time of relief or of a previous overlay relief. No number changes are required for existing customers.*
- *Least disruptive to end-users.*
- *Less economic burden for existing business.*
- *Same location, two or more NPAs in residence/business.*
- *Directory costs may increase.*
- *If mandatory 10-digit dialling does not exist in the NPAs being relieved and a transition to mandatory 10-digit dialling is required, the transition can be implemented in a shorter time than the permissive dialling period required with an NPA split.*

4.3 Boundary Realignment

4.3.1 Definition

A Boundary Realignment is when the geographic boundaries of an existing neighbouring NPA or NPAs are expanded to merge with either all or part of the NPA requiring relief. This method may be used to defer adding a new NPA where excess capacity is available in the neighbouring NPA(s). A Boundary Realignment in effect creates a Distributed Overlay or a Concentrated Overlay on the NPA being relieved.

4.3.2 General Attributes

- *Requires universal 10-digit dialling within and between NPAs.*
- *No number changes are required for existing customers.*
- *Less disruptive to end-users.*
- *Less economic burden for existing business.*
- *Same location, two or more NPAs in residence/business.*
- *Increased directory costs.*
- *Advances exhaust of neighbouring NPA(s).*

4.4 Technology-specific Overlay

4.4.1 Definition

A Technology-specific Overlay is an overlay of a new NPA that is assigned specifically to one or more types of service or technology. An example of a Technology-specific Overlay is a new NPA dedicated only to wireless services.

With the introduction of WNP in Canada, telephone numbers can be moved between wireline and wireless services, therefore the use of an NPA cannot be limited to one type of service or technology, and this method is not viable.

4.4.2 General Attributes

For the following reasons, this type of overlay has generally not been accepted as a preferred method:

- *Would be inconsistent with regulatory practice of seeking technology-neutral solutions.*
- *Favours certain types of service provider, i.e. not competitively neutral.*
- *Inconsistent with implementation of Local Number Portability between types of service provider or technology.*
- *Inconsistent with service providers' changes of type of service provider, e.g. migration from Wireless Service Provider to Local Exchange Carrier.*
- *Numbers in the existing NPA currently used for the service or technology to be moved to the new Technology-specific NPA would need to be changed; otherwise the new NPA would only provide relief for growth in the service or technology to which the new NPA is assigned. When existing CO Codes in the old NPA are shared between services needing a number change and services that do not need a number change, then these number changes would require that initial CO Codes be assigned in the new NPA,*

6. RELIEF OPTIONS

The four NPA relief methods described in this Planning Document (PD) are the Geographic Split, the Overlay, the Boundary Realignment, and the Technology-specific Overlay.

Based on the first three of the above methods used alone and in combination, the following 14 relief options were identified and examined in detail:

- Geographic Split - 6 options (Plans 1a, 1b, 2a, 2b, 3a and 3b)
- Boundary Realignment – 2 options (Plans 4a and 4b)
- Distributed Overlay - 6 options (Plans 5a, 5b, 5c, 5d, 5e and 5f)

In March 2007, the CNA declared a Jeopardy Condition in NPA 418 and established the Projected Exhaust Date as October 2008. Relief Options using the Concentrated Overlay and the Technology-specific Overlay methods were examined in less detail by the CNA as the timeframe before relief must be implemented is too short to permit a Concentrated Overlay and implementation of WNP eliminates the Technology-specific Overlay method. Consequently, analysis of both these methods has been excluded from the IPD.

Future Projected Exhaust Dates were developed for all Relief Options using the assumption that the future Projected Exhaust Dates will not be significantly affected by any CO Code protection that would be required if there is any 7-digit local dialling across NPA boundaries after relief.

Equipment used by local exchange carriers to provide service in some exchanges, typically those serving small communities, is able to provide both 7 and 10-digit local dialling (permissive dialling), and can route calls to an announcement, e.g. when 10-digit dialling is mandatory, or an NPA has changed, but may not be able to connect a call following an announcement (i.e., cut-through), as is usually required during transition to an overlay. Investments that would be required to upgrade or replace network elements to provide transition announcements in some communities could be significant relative to their size, and such investments would provide a capability that would only be used for a short time, i.e. during the dialling transition period. It is therefore suggested that if the relief method that is adopted includes an overlay, then where a TSP's network equipment does not support an announcement followed by cut-through, the TSP would not be required to provide announcement plus cut-through during the transition period, and only be required to provide permissive 7/10 digit dialling in that community with no announcement until 10-digit dialling becomes mandatory. In such cases, TSPs would also be required to use additional and/or alternative methods of educating customers in the affected communities. Such methods of education could include, but may not be limited to, advertisements in local newspapers (in areas where local newspapers are published), notices provided to customer using their billing notification method (e.g. paper mail or email), and information on websites.

In Telecom Decision CRTC 2006-26, the CRTC addressed the above situation and established a process and requirements for carriers to follow. The RPC reviewed this Decision and recommends the following approach be adopted for NPA 418 which is based upon this Decision.

In situations where TSPs have network limitations in providing recorded announcements with call completion, and the provision of such announcements and call completion would be prohibitively expensive (e.g., for independent companies in small and/or remote locations served by legacy technology), it is recommended that such TSPs may submit written requests to CRTC staff seeking relief from the obligation of providing industry standard network announcements with automatic call completion on calls dialled using 7 digits prior to the implementation of mandatory 10-digit dialling. In such circumstances, those TSPs seeking relief shall be required to inform their customers of the 10-digit dialling requirement by:

- sending monthly bill inserts (to be submitted at least one month prior to insertion to CRTC staff for approval) in each of the 4 months immediately prior to the month when mandatory 10-digit local dialling is scheduled to be implemented;
- placing two notices in local newspapers (if available), one during the month prior to the month when mandatory 10-digit local dialling is scheduled to be implemented, and one during the month when mandatory 10-digit local dialling is scheduled to be implemented;
- sending a personal letter to each affected customer, to be received 10 days prior to the implementation date of mandatory 10-digit dialling; and
- placing information on the TSPs' websites in a prominent, highly visible location for the minimum period of about 5 months ending at the end of the month when mandatory 10-digit local dialling is scheduled to be implemented.

See Annex A, Figures 7 through 16 for diagrams of the Relief Options identified by the RPC.

The selection of an appropriate NPA for relief of NPA 418 is addressed in the Canadian NPA Relief Planning Guidelines. On the CNA web site there is a NPA Selection Tool that can be used to determine which NPAs that are currently available for assignment in Canada meet the criteria for NPA assignment contained in the Canadian NPA Relief Planning Guidelines. CO Codes 431 and 581 are the only 2 NXXs in the current list of Projected Future Canadian Geographic NPAs that meet the criteria that requires the relief NPA to not correspond to any CO Codes assigned in the home or neighbouring NPAs, in this case in NPAs 418, 506, 709 and 819. Further analysis of the Projected Future Canadian Geographic NPAs indicates that NPA 431 also meets the requirements as a future NPA for NPA 204 which has a Projected Exhaust Date of November 2016. The only other Projected Future Canadian Geographic NPA which could be used to relieve NPA 204 is NPA 579; however, NPA 579 is the only Projected Future Canadian Geographic NPA which can relieve NPA 450 which is projected to exhaust in September 2013. It is therefore recommended that NPA 581 be identified as the most suitable NPA for relief of NPA 418. See Annex B, Table 2 for details of the status in NPA 418 and Adjacent NPAs of NXXs that correspond to Projected Future Canadian Geographic NPAs.

6.1 Geographic Split

Six different Relief Options were evaluated to introduce a new NPA in the NPA 418 area using the Geographic Split method of providing CO Code relief. With each of these options, number changes are required in the area that does not retain NPA 418.

North-South Split Options 1a and 1b

In two of the geographic split options (Plans 1a and 1b), NPA 418 is split into a northern portion and a southern portion along a boundary which starts in the West in the unserved area between

After the split, NPA 418 and the new NPA would be expected to exhaust in 2037 and 2041 respectively.

Assessment:

The RPC does not recommend this Relief Option because 1,069,300 people would be affected by a telephone number change, which would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones, change back-office support and billing systems, etc. The time required to implement this option would be longer than the time needed to implement an overlay, and the probability of being able to provide relief prior to exhaust using this method is reduced. In addition this plan would increase the number of relief planning areas in Québec and does not provide a direction for future reliefs. However, in the event that a split is ordered by the CRTC, Split options 1a) and 1b) are preferred over the other Split options as there would be minimal cross-NPA boundary local calling and therefore the amount of CO Code Protection that would be required would be minimal.

6.1.2. Plan 1b: North-South Split Option - Northern region changes to New NPA

Description:

The southern portion of NPA 418, with 105 exchanges, would retain NPA 418, and the northern portion of NPA 418, with 153 exchanges, would be reassigned to a new NPA. Around 667,700 people in NPA 418 would be affected by a telephone number change to the new NPA. The quantity of number changes required by this option is slightly lower than the quantity of number changes required by Plan 1a.

After this split, NPA 418 and the new NPA would be expected to exhaust in 2041 and 2037 respectively.

Assessment:

The RPC does not recommend this Relief Option because approximately 668,000 people would be affected by a telephone number change which would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones, change back-office support and billing systems, etc. The time required to implement this option would be longer than the time needed to implement an overlay, and the probability of being able to provide relief prior to exhaust using this method is reduced. In addition this plan would increase the number of relief planning areas in Québec and does not provide a direction for future reliefs. Split options 1a) and 1b) are preferred over the other Split options for the reasons identified above.

6.1.3. Plan 2a: TELUS Québec LIR Split Option - Non-TELUS Québec LIR region changes to New NPA

Description:

The portion of NPA 418 consisting of TELUS Québec LIR Exchange Areas, with 135 exchanges, would retain NPA 418, and the portion of NPA 418 consisting of Bell, Sogetel, and Telebec LIR Exchange Areas and Independent Exchange Areas, with 123 exchanges, would be reassigned to a new NPA. The area that would retain NPA 418 contains the rapidly growing exchanges of Baie Comeau, Donnacona, Montmagny, Rimouski, Sept-Îles, and St-Georges-de-Beauce while the new NPA would contain the rapidly growing exchanges of Québec, Chicoutimi, Rivière-du-Loup and Thetford Mines. Using this option, approximately 1,094,300 people would be affected by a telephone number change to the new NPA.

After the split, NPA 418 and the new NPA would be expected to exhaust in 2044 and 2034 respectively.

Assessment:

The RPC does not recommend this Relief Option because approximately 1,094,000 people would be affected by a telephone number change which would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones, change back-office support and billing systems, etc. The time required to implement this option would be longer than the time needed to implement an overlay, and the probability of being able to provide relief prior to exhaust using this method is reduced.

This Relief Option would result in a mix of 7- and 10-digit local dialling in numerous exchanges with local dialling across the split boundaries or would require CO Code Protection if 7-digit local dialling were retained. The old and new NPAs would not be contiguous areas, and their boundaries would be difficult to communicate to customers. In addition this plan would increase the number of relief planning areas in Québec and does not provide a direction for future reliefs.

6.1.4. Plan 2b: TELUS Québec LIR Split Option - TELUS Québec LIR changes to New NPA

Description:

The portion of NPA 418 consisting of Bell, Sogetel, and Telebec LIR Exchange Areas and Independent Exchange Areas, with 123 exchanges, would retain NPA 418, and the portion of NPA 418 consisting of TELUS Québec LIR Exchange Areas, with 135 exchanges, would be reassigned to a new NPA. Around 642,700 people in NPA 418 would be affected by a telephone number change to the new NPA. The quantity of number changes required by this option is slightly better than the quantity of number changes required by Plan 2a.

After this split, NPA 418 and the new NPA would be expected to exhaust in 2033 and 2045 respectively.

Assessment:

The RPC does not recommend this Relief Option because approximately 643,000 people would be affected by a telephone number change which would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones, change back-office support and billing systems, etc. The time required to implement this option would be longer than the time needed to implement an overlay, and the probability of being able to provide relief prior to exhaust using this method is reduced.

This Relief Option would result in a mix of 7-and 10-digit local dialling in numerous exchanges with local dialling across the split boundaries and would require CO Code Protection if 7-digit local dialling were retained. As indicated for option 2b above, the old and new NPAs would not be contiguous areas, the boundaries of which would be difficult to convey to customers. In addition this plan would increase the number of relief planning areas in Québec and does not provide a direction for future reliefs.

6.1.5. *Plan 3a: St. Lawrence River Split Option - South of St. Lawrence changes to New NPA*

Description:

The northern portion of NPA 418, with 114 exchanges, would retain NPA 418, and the southern portion of NPA 418, with 144 exchanges, would be reassigned to a new NPA. The area that would retain NPA 418 contains the rapidly growing exchanges of Québec, Baie Comeau, Chicoutimi, La Baie, and Sept-Îles while the new NPA would contain the rapidly growing exchanges of Levis, Rivière-du-Loup, Rimouski, St-Georges-de-Beauce, St-Nicolas, and Thetford Mines. Using this option, approximately 695,400 people would be affected by a telephone number change to the new NPA.

After the split, NPA 418 and the new NPA would be expected to exhaust in 2032 and 2046 respectively.

Assessment:

The RPC does not recommend this Relief Option because approximately 695,000 people would be affected by a telephone number change which would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones, change back-office support and billing systems, etc. The time required to implement this option would be longer than the time needed to implement an overlay, and the probability of being able to provide relief prior to exhaust using this method is reduced.

Although the new boundary would be more easily identified than Options 2a) and 2b), this Relief Option would result in a mix of 7 and 10-digit local dialling in exchanges that have local calling across the St Lawrence River or would require CO Code Protection if 7-digit dialling were retained. In addition this plan would increase the number of relief planning areas in Québec and does not provide a direction for future reliefs.

6.1.6. Plan 3b: St. Lawrence River Split Option - North of St. Lawrence changes to New NPA

Description:

The southern portion of NPA 418, with 144 exchanges, would retain NPA 418, and the northern portion of NPA 418, with 114 exchanges, would be reassigned to a new NPA. Around 1,041,500 people in the NPA 418 would be affected by a telephone number change to the new NPA. The larger quantity of number changes required by this option is a drawback compared to the quantity of number changes required by Plan 3a.

After this split, NPA 418 and the new NPA would be expected to exhaust in 2046 and 2032 respectively.

Assessment:

The RPC does not recommend this Relief Option because approximately 695,000 people would be affected by a telephone number change which, as stated above for options 1a, 1b, 2a, 2b and 3a, would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones, change back-office support and billing systems, etc. The time required to implement this option would be longer than the time needed to implement an overlay, and the probability of being able to provide relief prior to exhaust using this method is reduced.

As indicated for option 3a, although the new boundary is more easily identified than options 2a) and 2b), this Relief Option would result in a mix of 7 and 10-digit local dialling in exchanges with local calling across the St Lawrence River or would require CO Code Protection if 7-digit dialling were retained. In addition this plan would increase the number of relief planning areas in Québec and does not provide a direction for future reliefs.

6.2 Boundary Realignment

Two options were evaluated to provide NPA relief using the Boundary Realignment method.

6.2.1. Plan 4a: Boundary Realignment of NPA 819 to overlay NPA 418 coincident with mandatory 10-digit local dialling in NPA 418

Description:

This option would realign the NPA 819 boundary to create an expanded NPA 819 area that included the NPA 418 area. At the same time, the mandatory 10-digit local dialling now in effect in the original NPA 819 area would be extended to apply also in the NPA 418 area.

NPA 418 and NPA 819 would be expected to exhaust in 2012.

This option would reduce the number of separate Relief Planning areas in the province of Québec by one, and a total of 1 new NPA would be required in the NPA 418 and 819 areas during the next 20 years.

Assessment:

The RPC does not recommend this option because the relief it would provide is too short-lived.

Although this option avoids the requirement for a new NPA at the time of relief, a subsequent relief with a new NPA would be required by 2011 (before NPAs 418 and 819 exhaust in 2012) which is only about 4 years from now (May 2007). As NPA 819's Projected Exhaust Date is currently February 2015, this option would advance relief for NPA 819 by about 3 years from February 2014 to 2011.

6.2.2. Plan 4b: Boundary Realignment of NPA 819 to overlay NPA 418 in phase 1, and mandatory 10-digit local dialling and new NPA to overlay NPAs 418 and 819 in phase 2

Description:

In the first phase of relief, this option would realign the NPA 819 boundary to expand NPA 819 to include the NPA 418 area (only if required and potentially only on a temporary basis), while retaining 7-digit dialling. Any NPA 819 CO Code assignments required to be activated in exchanges in NPA 418 prior to the completion of phase 2 mandatory 10-digit local dialling would be subject to Special CO Code Assignment Practices.

In the second phase, a new NPA would be added to overlay the expanded NPA 819 and NPA 418 area, and the mandatory 10-digit local dialling effective since 2006 in the current NPA 819 area would be extended to apply also in the NPA 418 area. The boundary of NPA 819 for future CO Code assignment purpose could be returned to its original area, but could leave some NPA 819 CO Codes assigned in the NPA 418 area. The Special CO Code Assignment Practices would be discontinued when the transition to mandatory 10-digit local dialling in NPA 418 has been completed.

NPAs 418 and 819 and the new NPA would be expected to exhaust in 2027.

This option would reduce the number of separate Relief Planning areas in the province of Québec by one. One new NPA would be required for this relief and one new NPA would subsequently be required in the NPA 418 and 819 areas in 18 year's time.

Assessment:

With this option relief could be provided starting in phase 1 by activating NPA 819 CO Codes in the NPA 418 area as and when required prior to phase 2 mandatory 10-digit local dialling. Since NPA 819 is already assigned in Québec and activated throughout the NANP network, and since mandatory 10-digit local dialling is not required as part of phase 1, this option may provide relief sooner than all other options which require activation of a new NPA in phase 1 or waiting for completion of mandatory 10-digit local dialling. If the length of time required to implement relief using a single-phase distributed overlay option (plan 5a or 5c) extends beyond exhaust, then

this option may provide a way to avoid the adverse effects that a lack of CO Codes would have on carriers, particularly on those planning to compete in new markets and serve new customers.

During this phase, special network translations would be required for long distance routing to NPA 819 numbers in the NPA 418 area.

If it turns out that exhaust does not actually occur until after mandatory 10-digit dialling has been implemented, then with this option no NPA 819 CO Codes need be assigned in the NPA 418 area and the relief option ends up closely resembling the distributed overlay option plan 5c.

If exhaust did occur before mandatory 10-digit dialling, and some NPA 819 CO Codes were assigned in the NPA 418 area, then to minimize the presence of additional NPA 819 CO Codes in the NPA 418 area, CO Code demand after phase 2 could be satisfied using only the new NPA, and remaining NPA 819 CO codes could be restricted to assignments in the original NPA 819 area, which for future CO Code assignment purpose would in effect return the NPA 819 boundary to its original area, but could leave some NPA 819 CO Codes assigned in the NPA 418 area.

In addition, availability of CO Codes in the new NPA for assignment in the NPA 819 area could be deferred for a period in order to provide more time for carriers and customers to be prepared for the new NPA in the NPA 819 area.

This option could create additional customer and carrier confusion while 7-digit dialling remains in NPA 418 since some Exchange Areas in NPA 418 could have 10-digit local dialling to CO Codes in the existing NPA 819 area as well as 7-digit dialling to NPA 819 CO Codes assigned in the NPA 418 area.

This option would eliminate the need to initiate relief planning activity for NPA 819 in 2009. As NPA 819's Projected Exhaust Date is currently February 2015, this option would advance relief for NPA 819 by about 5 years from February 2014 to 2009.

6.3 Distributed Overlay

Six Relief Options were evaluated to introduce a new NPA using the Distributed Overlay method of providing NPA relief.

6.3.1. Plan 5a: Distributed Overlay of new NPA on NPA 418 coincident with mandatory 10-digit local dialling

Description:

This Relief Option would introduce a new NPA to overlay NPA 418 when the transition to mandatory 10-digit dialling was completed. NPA 418 and the new NPA would be expected to exhaust in 2008 and 2041 respectively.

This option would not change the number of separate Relief Planning areas in the province of Québec. One new NPA would be required for this relief, and another new NPA may be required for the relief of NPA 819 within the next 20 years.

Assessment:

The RPC views this distributed overlay of NPA 418 as a viable option because:

- Number changes are avoided thus minimizing negative impacts on customers and Wireless Service Providers (reprogramming of wireless handsets);
- The costs to implement an overlay by TSPs are expected to be less than for a split;
- No boundary changes of existing NPAs and no new boundaries within the NPA 418 area;
- With this option, 10-digit local dialling, which has been implemented in many Canadian NPAs, would become standard throughout the province of Québec. The adoption of 10-digit local dialling would be consistent with the evolution to 10-digit dialling for all local calls under the Uniform Dialling Plan as recommended by the Industry Numbering Committee and the Canadian Steering Committee on Numbering;
- The life of this relief (i.e., until 2041) would exceed the 8 year minimum period specified by the Canadian NPA Relief Planning Guidelines.

This option would not eliminate the need to initiate relief planning activity for NPA 819 in early 2009. However, this option could lead to a solution for NPA 819 relief when required; i.e., the relief NPA for NPA 418 could have its boundary extended to cover NPA 819.

6.3.2. *Plan 5b: Distributed Overlay of new NPA on NPA 418 in phase 1, and mandatory 10-digit local dialling in phase 2*

Description:

In the first phase of relief, this option would introduce a new NPA to overlay NPA 418, while retaining existing 7-digit dialling in NPA 418. Any New-NPA CO Code assignments required to be activated in exchanges in NPA 418 prior to the completion of phase 2 mandatory 10-digit local dialling would be subject to Special Practices for CO Code Assignments.

In the second phase, a transition to mandatory 10-digit local dialling would take place in the NPA 418 area. The Special Practices for CO Code Assignments would be discontinued when the transition has been completed.

NPA 418 and the new NPA would be expected to exhaust in 2008 and 2041 respectively.

This option would not change the number of separate Relief Planning areas in the province of Québec.

Assessment:

The RPC views this distributed overlay of NPA 418 as a viable option because:

- Number changes are avoided thus minimizing negative impacts on customers and Wireless Service Providers (reprogramming of wireless handsets);
- The costs to implement an overlay by TSPs are expected to be less than for a split;
- No boundary changes of existing NPAs and no new boundaries within the NPA 418 area;

- With this option, 10-digit local dialling, which has been implemented in many Canadian NPAs, would become standard throughout the province of Québec. The adoption of 10-digit local dialling would be consistent with the evolution to 10-digit dialling for all local calls under the Uniform Dialling Plan as recommended by the Industry Numbering Committee and the Canadian Steering Committee on Numbering;
- The life of this relief (i.e., until 2041) would exceed the 8 year minimum period specified by the Canadian NPA Relief Planning Guidelines.

With this option relief could be provided starting in phase 1 by activating new NPA CO Codes in the NPA 418 area prior to phase 2 mandatory 10-digit local dialling. This option may provide relief sooner than plans 5a and 5c which require waiting for completion of mandatory 10-digit local dialling before relief is provided. If a new NPA can be assigned and activated sooner than carriers and customers can implement mandatory 10-digit dialling, then this option could potentially avoid the adverse effects that a lack of CO Codes would have on carriers, particularly on those planning to compete in new markets and serve new customers.

This option would require the CNA to implement Special Practices for CO Code Assignments up until 66 days prior to the implementation of mandatory 10-digit local dialling.

This option would not eliminate the need to initiate relief planning activity for NPA 819 in early 2009. However, this option could lead to a solution for NPA 819 relief when required; i.e., the relief NPA for NPA 418 could have its boundary extended to cover NPA 819.

6.3.3. *Plan 5c: Distributed Overlay of new NPA on NPAs 418 and 819 coincident with mandatory 10-digit local dialling in NPA 418*

Description:

This Relief plan would introduce a new NPA to overlay NPAs 418 and 819 when the transition to mandatory 10-digit local dialling was completed in NPA 418.

NPAs 418 and 819 and the new NPA would be expected to exhaust in 2027.

This option would reduce the number of separate Relief Planning areas in the province of Québec by one. One new NPA would be required for this relief, and one new NPA would subsequently be required in the NPA 418 and 819 areas in 18 year's time.

Assessment:

This option could not provide relief until mandatory 10-digit local dialling has been implemented in NPA 418, which may mean that relief is not provided until after exhaust has occurred, with potentially adverse affects on all carriers, and particularly on those planning to compete in new markets and serve new customers.

This option would eliminate the need to initiate relief planning activity for NPA 819 in early 2009.

This option would address relief planning activity for NPA 819 in advance and potentially simplify the implementation of relief for NPA 819 when required.

This option would preclude the option of implementing a separate new NPA to overlay NPA 819.

With this option a new NPA would be introduced in NPA 819 about 5 years sooner than required if NPA 819 is relieved separately, which may advance the costs incurred by TSPs. However, the availability of CO Codes in the new NPA for assignment in the NPA 819 area could be deferred for a period in order to provide more time for carriers and customers to deal with the new NPA in the NPA 819 area.

6.3.4. *Plan 5d: Distributed Overlay of new NPA on NPAs 418 and 819 in phase 1, and mandatory 10-digit local dialling in NPA 418 in phase 2*

Description:

In the first phase of relief, this option would introduce a new NPA to overlay NPAs 418 and 819, while retaining 7-digit dialling within the NPA 418 area. Any New-NPA CO Code assignments required to be activated in exchanges in NPA 418 prior to the completion of phase 2 mandatory 10-digit local dialling would be subject to Special Practices for CO Code Assignments.

In the second phase, mandatory 10-digit local dialling would be implemented in the NPA 418 area. The Special Practices for CO Code Assignments would be discontinued when the transition to mandatory 10-digit local dialling in NPA 418 has been completed.

NPAs 418 and 819 and the new NPA would be expected to exhaust in 2027.

This option would reduce the number of separate Relief Planning areas in the province of Québec by one. One new NPA would be required for this relief, and one new NPA would subsequently be required in the NPA 418 and 819 areas in 18 year's time.

Assessment:

This option would eliminate the need to initiate relief planning activity for NPA 819 in early 2009.

With this option relief could be provided starting in phase 1 by assigning new NPA CO Codes in the NPA 418 area as and when required prior to phase 2 10-digit mandatory local dialling. This option may provide relief sooner than options which require waiting for completion of mandatory 10-digit local dialling (plans 4a, 5a and 5c) before relief is provided. This approach may be a way to avoid the adverse effects that a lack of CO Codes would have on carriers, particularly on those planning to compete in new markets and serve new customers.

This option would address relief planning activity for NPA 819 in advance and potentially simplify the implementation of relief for NPA 819 when required.

This option would preclude the option of implementing a separate new NPA to overlay NPA 819.

With this option a new NPA would be introduced in NPA 819 about 5 years sooner than required if NPA 819 is relieved separately, which may advance the costs incurred by TSPs. However, the availability of CO Codes in the new NPA for assignment in the NPA 819 area could be deferred for a period in order to provide more time for carriers and customers to deal with the new NPA in the NPA 819 area.

6.3.5. Plan 5e: Distributed Overlay of new NPA on NPA 418 coincident with mandatory 10-digit local dialling in NPA 418 in phase 1, Boundary Realignment of relief NPA to overlay NPA 819 in phase 2

Description:

In the first phase of relief, this option would introduce a new NPA to overlay NPAs 418 when the transition to mandatory 10-digit local dialling was completed in NPA 418.

In the second phase, the boundary of the relief NPA would be realigned to overlay NPA 819 when relief is required for NPA 819. NPA 819 already has mandatory 10-digit local dialling.

After the boundary realignment, NPAs 418 and 819 and the new NPA would be expected to exhaust in 2027.

This option would reduce the number of separate Relief Planning areas in the province of Québec by one. One new NPA would be required for this relief, and one new NPA would subsequently be required in the NPA 418 and 819 areas in about 19 year's time.

Assessment:

This option could not provide relief until mandatory 10-digit local dialling has been implemented within NPA 418, which may mean that relief is not provided until after exhaust has occurred, with potentially adverse affects on all carriers, and particularly on those planning to compete in new markets and serve new customers.

This option would address relief planning activity for NPA 819 in advance and potentially simplify the implementation of relief for NPA 819 when required.

This option would preclude the option of implementing a separate new NPA to overlay NPA 819.

6.3.6. Plan 5f: Distributed Overlay of new NPA on NPA 418 in phase 1, mandatory 10-digit local dialling in NPA 418 in phase 2, and Boundary Realignment of relief NPA to overlay NPA 819 in phase 3

Description:

In the first phase of relief, this option would introduce a new NPA to overlay NPA 418, while retaining 7-digit dialling within the NPA 418 area. Any New-NPA CO Code assignments required to be activated in exchanges in NPA 418 prior to the completion of phase 2 mandatory 10-digit local dialling would be subject to Special Practices for CO Code Assignments.

In the second phase, mandatory 10-digit local dialling would be implemented in the NPA 418 area. The Special Practices for CO Code Assignments would be discontinued when the transition to mandatory 10-digit local dialling in NPA 418 has been completed.

In the third phase, the boundary of the relief NPA would be realigned to overlay NPA 819 when relief is required for NPA 819. NPA 819 already has mandatory 10-digit local dialling.

7. SUMMARY OF RELIEF OPTIONS

The following table summarizes the alternative Geographic Split Options:

Plan		Projected Exhaust Dates			Relief - Timing & Type		Popula- tion affected by No. changes	Local Dial # of digits
#	Description	NPA 418	NPA 819	New NPA	Date (NPA being relieved)	Type		
1a	North-South Split - Southern region changes to New NPA	2008 2041	<i>n/a</i>	2037	2008 (418) 2039 (418) 2035 (new NPA)	S ? ?	1.069m ? ?	7 ??
1b	North-South Split - Northern region changes to New NPA	2008 2037	<i>n/a</i>	2041	2008 (418) 2035 (418) 2039 (new NPA)	S ? ?	.668m ? ?	7 ? ?
2a	TELUS Québec LIR Split - Non-TELUS Québec LIR region changes to New NPA	2008 2044	<i>n/a</i>	2034	2008 (418) 2042 (418) 2032 (new NPA)	S ? ?	? ? ?	7 ? ?
2b	TELUS Québec LIR Split - TELUS Québec LIR changes to New NPA	2008 2033	<i>n/a</i>	2045	2008 (418) 2031 (418) 2043 (new NPA)	S ? ?	? ? ?	7 ? ?
3a	St. Lawrence River Split - South of St. Lawrence changes to New NPA	2008 2032	<i>n/a</i>	2046	2008 (418) 2031 (418) 2044 (new NPA)	S ? ?	.695m ? ?	7 ? ?
3b	St. Lawrence River Split - North of St. Lawrence changes to New NPA	2008 2046	<i>n/a</i>	2032	2008 (418) 2044 (418) 2031 (new NPA)	S ? ?	1.042m ? ?	7 ? ?
4a	Boundary realignment of NPA 819 on NPA 418 coincident with 10-D	2008	<i>2012</i>		2008 (418) 2010 (418/819)	O	Nil Nil	10 10
4b	Boundary realignment of NPA 819 on NPA 418 in phase 1; new NPA on NPAs 418 & 819 and 10-D in phase 2	2008 2032	<i>2015</i> <i>2032</i>	2027	2008 (418) 2025 (418/819/new)	O	Nil Nil	10 10
Key	10-D = mandatory 10-digit local dialling, O = Overlay, S = Split, ? = Unknown population affected by number changes, subsequent relief type and dial plan							

The following table summarizes the alternative Overlay and Boundary Realignment Options:

Plan		Projected Exhaust Dates			Relief - Timing & Type		Popula- tion affected by No. changes	Local Dial # of digits
#	Description	NPA 418	NPA 819	New NPA	Date (NPA being relieved)	Type		
5a	Distributed Overlay of new NPA on NPA 418 coincident with 10-D	2008	<i>n/a</i>	2041	2008 (418) 2039 (new NPA)	O	Nil Nil	10 10
5b	Distributed Overlay of new NPA on NPA 418 in phase 1; 10-D in phase 2	2008	2015	2041	2008 (418) 2039 (new NPA)	O	Nil Nil	10 10
5c	Distributed Overlay of new NPA on NPAs 418 & 819 coincident with 10-D	2008 2027	2015 2027	2027	2008 (418) 2025 (418/819/new)	O	Nil Nil	10 10
5d	Distributed Overlay of new NPA on NPAs 418 & 819 in phase 1; 10-D in phase 2	2008 2027	2015 2027	2027	2008 (418) 2025 (418/819/new)	O	Nil Nil	10 10
5e	Distributed Overlay of new NPA on NPA 418 coincident with 10-D in phase 1, Boundary Realignment of relief NPA on NPA 819 in phase 2	2008 2027	2015 2027	2027	2008 (418) 2014 (819) 2025 (418/819/new)	O	Nil Nil	10 10
5f	Distributed Overlay of new NPA on NPA 418 in phase 1, 10-D in phase 2, Boundary Realignment of relief NPA on NPA 819 in phase 3	2008 2027	2015 2027	2027	2008 (418) 2014 (819) 2025 (418/819/new)	O	Nil Nil	10 10
Key	10-D = mandatory 10-digit local dialling, O = Overlay, S = Split, ? = Unknown population affected by number changes, subsequent relief type and dial plan							

8. IDENTIFICATION & ASSESSMENT OF RELIEF OPTIONS CONSIDERED BY THE RELIEF PLANNING COMMITTEE

The Relief Planning Committee considered the Initial Planning Document (IPD) developed by the CNA and, based upon discussion, identified a total of 14 Relief Options for consideration. A Pro, Neutral or Con (P, N or C) rating was established for each Relief Option for each of the following attributes. The results are listed in the table below the list of attributes.

- A. NPA Code Conservation – quantity of new NPAs required in NPA 418 within the next 20 years (P = 0 new NPAs; N = 1 new NPAs; C = 2 or more new NPAs)
- B. NPA Code Conservation – quantity of new NPAs required for NPA 819 within the next 20 years in addition to those required in NPA 418 (P = 0 new NPAs; N = 1 new NPAs; C = 2 or more new NPAs)
- C. Number of separate Relief Planning areas in Québec in the long term (P = decrease; N = stays same; C = increase)
- D. Quantity of Number Changes for existing customers' numbers (none = P, many = C)
- E. Level of Carrier Costs – e.g., including implementation, customer awareness, rate of return (P = Low; N = Medium; C = High)
- F. Time required to implement relief, i.e., time between the CRTC's Decision date and the date when CO Codes in the new NPA can be activated (shortest=P, medium = N, longest = C)
- G. Longevity – the length of time between this relief and subsequent relief activity in NPA 418 (e.g., a new area code) (P = 15 or more years; N = 9 through 14 years; C = within 8 years)
- H. Longevity – the length of time between this relief and subsequent relief activity in NPA 819 ((e.g., a new area code) (P = 15 or more years; N = 9 through 14 years; C = within 8 years)
- I. Geographic Identity – NPA boundaries align with boundaries of known areas (e.g., existing NPA areas, provinces) or identifiable geographical features (e.g., rivers, islands)(P = High; N = Medium; C = Low)
- J. Adds areas with mix of 7- and 10-digit local dialling in NPA 418 (none = P, minor amount = N, significant = C)
- K. Consistent with the transition towards universal 10-digit local dialling, the Uniform Dialling Plan and future NANP Expansion
- L. Reprogram Mobile Phones – requirement to reprogram wireless devices to accommodate the number changes (P = low; N = Medium; C = High)
- M. Potential maximum quantity of NPAs in an Exchange Area in the next 20 years (1 NPA = P, 2 NPAs = N, 3 NPAs = C)
- N. Does the option consider the potential direction for future reliefs in NPA 819? (P = Yes; C = No)
- O. Mix of 7- and 10-digit local dialling from NPA 418 to NPA 819 prior to mandatory 10-digit local dialling (P = No; C = Yes)

Dial Plan Scenarios	Today	After 418 Overlay
Landline to Landline within NPA	7- (&10)* digits	10-digits
Landline to Landline from NPA 418 to NPAs 506 and 709	7-(&10)* digits	10-digits
Landline to Landline from NPA 418 to NPA 819	10-digits	10-digits
Wireless to Wireless within NPA	7/10/11-digits	10/11-digits
Wireless to Wireless from NPA 418 to adjacent NPAs	10/11-digits	10/11-digits

* Note: Today 10-digit local dialling is provided on a permissive basis in almost all cases as well as 7-digits

The dialling plan for exchange areas in NPAs 506, 709 and 819 will not change. See the tables below.

Local Dialling Plan for Customers in Neighbouring Exchange Area of Campbellton NB in NPA 506 and Labrador City – Wabush NL in NPA 709 (No Change)

Dial Plan Scenarios	Today	After 418 Split	After 418 Overlay
Landline to Wireless from NPAs 506 and 709 to NPA 418	10-digits	10-digits	10-digits
Landline to Landline from NPAs 506 and 709 to NPA 418	7-digits	7/10-digits**	7/10-digits**
Wireless to Wireless from NPAs 506 to NPA 418	10/11-digits	10/11-digits	10/11-digits

**7-digit local dialling from NPA 506 could be retained after an overlay or split of NPA 418 subject to a small amount of CO Code protection being added in the new NPA if the relief is an overlay, or if a split changes the portion of NPA 418 adjacent to NPAs 506 to a new NPA.

Local Dialling Plan for Customers in Neighbouring NPA 819

Dial Plan Scenarios	Today	After 418 Split	After 418 Overlay
Landline to Wireless from NPA 819 to NPA 418	10-digits	10-digits	10-digits
Landline to Landline from NPA 819 to NPA 418	10-digits	10-digits	10-digits
Wireless to Wireless from NPA 819 to NPA 418	10/11-digits	10/11-digits	10/11-digits

11. SPECIAL OVERLAY POOL FOR INITIAL CODE ASSIGNMENTS

In CRTC Decision 2001-365 *Assignment of central office codes following relief of an area code*, the Commission directed that a pool of CO Codes be made accessible to any carrier applying for an initial code in a particular Exchange Area following the introduction of a new area code using the overlay method (called the "Pool for Initial Code Assignments").

Specifically, the CRTC directed that:

- a) a pool of CO codes be set aside for assignment to any carrier requesting an initial code, as described by the Canadian Central Office (NXX) Code Assignment Guidelines, for a particular exchange. CO codes assigned from this pool should not be replaced. This pool will be maintained for a period of only two years following the introduction of a new area code to avoid an undue impact on the exhaust of the new area code. Where such a pool exists, all initial code assignments shall be made from the pool. In cases where the Commission has not established the number of CO codes for this special pool, the appropriate CISC Ad Hoc Relief Planning Committee may make a recommendation to the Commission via the CISC process with regard to the number of CO codes for the pool; and
- b) all other CO codes remaining in the original area code and that are not part of the pool set aside for use as initial codes may be assigned using the normal administrative procedures set out in the Canadian Central Office (NXX) Code Assignment Guidelines.

The Canadian NPA Relief Planning Guidelines state in paragraph 2 of section 7.2, Overlay Method, that:

Following the implementation of an overlay, an appropriate number of CO Codes are set aside for Initial Code Applicants for a period of two years after the Relief Date (Letter Decision CRTC 2001-365). The quantity of CO Codes set aside following relief should be equivalent to the quantity set aside for this purpose in the case of a Jeopardy Condition as per section 9.1 of these guidelines.

In paragraph 5 of section 9.1 of those guidelines, it states:

The RPC shall recommend a quantity of CO Codes to be set aside, on the NPA CO Code Inventory Chart, for Initial Code Applicants whose requirements were not considered in the first J-COCUS. The quantity to be set aside for such Initial Code Applicants shall be based upon an assessment of the quantity of exchange areas in the NPA and the potential for Initial Code Applicants to enter the market in those exchange areas. The quantity of set aside Codes for FNEs [stet] should be recommended by the CNA in the IPD and approved or modified by the Relief Planning Committee (RPC), CISC and CRTC. This pool of CO Codes for Initial Code Applicants shall be used for initial Code assignments to [stet] until relief is provided.

In the Glossary of those guidelines, the term Initial Code Applicant is defined as follows:

12. REVISED JEOPARDY CONTINGENCY PLAN – NPA 418

On May 2, 2007 industry stakeholders submitted a Jeopardy Contingency Plan (JCP) for NPA 418 to the Commission. On May 28, 2007 the Commission released Telecom Public Notice CRTC 2007-8 in which the CRTC approved the JCP submitted by the industry stakeholders. The Relief Planning Committee reviewed the JCP submitted by stakeholders during its deliberations of the Planning Document and hereby submits a revised JCP for CRTC approval.

The following measures shall be implemented by all CO Code Holders in NPA 418 once approved by the CRTC.

- 1) During a Jeopardy Condition, Code Applicants shall submit all code applications and related correspondence for the jeopardy NPA to CRTC staff in addition to the CNA. The CNA will work closely with CRTC staff in the analysis of these applications.
- 2) Telecommunications Service Providers (TSPs) will implement the following conservation methods when this Jeopardy Contingency Plan is approved:
 - a) age disconnected residential telephone numbers for a maximum of two months;
 - b) age disconnected wireless telephone numbers for a maximum of three months;
 - c) age disconnected business telephone numbers for a maximum of six months. Under special circumstances, the six month aging limit for business telephone numbers may be extended to twelve months if required to accommodate local directory publishing dates for high volume call-in applications (e.g., heavily advertised local business numbers such as radio talk shows, food ordering services, ticket sales, chat lines), or for numbers associated with public service emergency applications or for numbers advertised in directories for which customers have requested reference of calls;
 - d) return all CO Codes that are not being used nor intended to be used to directly serve customers to the assignment pool within two months (e.g., plant test codes);
 - e) all CO Code Holders should work towards, and encourage existing customers, to either activate or return the reserved numbers in order to bring the reserved quantity down to a maximum of 10% of the quantity of numbers In-Service for that customer;
 - f) the quantity of reserved numbers shall not be increased by new reservation requests by existing customers to more than 10% of the quantity of numbers in service for that customer. In the case of new customers, number reservations shall be limited to 10% of the total quantity of telephone numbers being placed into service for that customer;
 - g) within 45 days from the date the CRTC approved the May 28, 2007 Jeopardy Contingency Plan, CO Code Holders shall submit a Part 1 Form for each remaining reserved CO Code to the CNA to return the reserved CO Code or to request assignment of the reserved CO Code. After this 45-day period, any reserved CO Code for which the CNA has not received a Part 1 Form requesting its assignment or returning it shall be made available by the CNA for general assignment with no aging period. Within 60 days from the date that this Jeopardy Contingency Plan becomes effective, the CNA shall report to CRTC staff and the RPC as to how many of these codes have been assigned or made available for

