



Telecom Public Notice CRTC 2006-3

Ottawa, 6 February 2006

Regulatory issues related to the implementation of wireless number portability

Reference: 8620-C12-200601288

In this Public Notice, the Commission invites comments on issues related to wireless number portability between wireless carriers and between those carriers and wireline local exchange carriers.

Background

1. The Commission's three-year work plans, issued in 2004 and 2005, indicated that the issue of wireless number portability (WNP) would be considered by the Commission during the 2005-2006 fiscal year. The Budget Plan tabled in Parliament on 23 February 2005 indicated the Government of Canada's preference that the Commission move expeditiously to implement WNP.
2. On 21 April 2005, the Canadian Wireless Telecommunications Association (CWTA) announced that Canada's wireless carriers had agreed to implement WNP. To that end, the CWTA engaged PricewaterhouseCoopers LLP (PwC) to conduct an independent review and provide an implementation plan that could be used by the wireless industry to implement WNP. The CWTA presented PwC's implementation report (PwC Report¹) to the Commission for information on 12 September 2005 and noted in its covering letter that it supported PwC's conclusions. The PwC Report included a description of the regulatory issues that PwC felt would have to be resolved prior to the implementation of WNP.
3. In *Implementation of wireless number portability*, Telecom Public Notice CRTC 2005-14, 16 September 2005, as amended by *Implementation of wireless number portability*, Telecom Public Notice CRTC 2005-14-1, 6 October 2005 (Public Notice 2005-14), the Commission invited comments on modifying the then-current regulatory regime so that wireless carriers could directly port telephone numbers. The Commission considered that dealing expeditiously with several issues identified in the Public Notice would permit WNP to be implemented at the earliest possible date. The Commission also noted that a number of other issues related to WNP would be considered in a future proceeding.
4. In *Implementation of wireless number portability*, Telecom Decision CRTC 2005-72, 20 December 2005 (Decision 2005-72), the Commission rendered its determinations on issues that required resolution for the implementation of WNP to get underway. For example, it granted wireless carriers direct access to the Canadian number portability systems, determined that the service porting interval for wireless-to-wireless simple porting be 2.5 hours and for

¹ *Implementation of Wireless Number Portability: Setting a New World-Class Standard.*

intermodal porting² would be the current local exchange carrier (LEC)-to-LEC porting interval, finalized the scenarios for porting involving wireless carriers, and set the dates by which WNP must be implemented, commencing in British Columbia, Alberta, Ontario, and Quebec by 14 March 2007.

5. In this Public Notice, the Commission launches a process to resolve the remaining WNP implementation issues.

Scope of the proceeding

6. The Commission invites comments on the following issues:
 - (a) the trunking arrangements for the interchange of traffic between wireless carriers and LECs in a portability environment;
 - (b) the need for wireless carriers to have a central office (CO) code in every wireline exchange area where wireless service is available;
 - (c) shared CO codes where the carrier of record is an incumbent local exchange carrier (ILEC);
 - (d) the wireless services subject to number porting;
 - (e) the criteria for denying a wireless porting request;
 - (f) the applicability of ILEC winback rules for customers whose numbers are ported between wireless carriers and ILECs;
 - (g) wireless carrier access to ILECs' operational support systems (OSS);
 - (h) directory listing information for numbers ported between wireless carriers and LECs;
 - (i) Enhanced 9-1-1 (E9-1-1) customer information for numbers ported between wireless carriers and LECs; and
 - (j) any other regulatory issues related to the implementation of WNP.

A. The trunking arrangements for the interchange of traffic between wireless carriers and LECs in a portability environment
7. The Commission notes that wireless carriers have extensive service coverage areas without having points of interconnection (POIs) in many wireline exchange areas. Also, wireless carriers may have their POIs in different ILEC exchanges for the same or similar service coverage areas. These differences in network architecture raise the issue of the extent to which calls to ported telephone numbers may be routed to POIs located outside of exchanges associated with ported telephone numbers.

² Porting between wireless carriers and wireline LECs is referred to as intermodal porting.

8. In Decision 2005-72, the Commission finalized the porting scenarios for wireless porting activities between Canadian carriers. In that Decision, the Commission determined that ported telephone numbers must remain associated with their original rate centres for rating purposes, while calls to ported telephone numbers could be routed to switches or POIs located outside of the exchange area associated with a ported telephone's rate centre.
9. The Commission notes that there are many different options as to how routing for aggregated exchanges and POIs can be accomplished. Two possible examples are (1) in accordance with the local interconnection regions established in *Trunking arrangements for the interchange of traffic and the point of interconnection between local exchange carriers*, Telecom Decision CRTC 2004-46, 14 July 2004 (Decision 2004-46) and (2) by local calling areas as suggested in the proceeding initiated by Public Notice 2005-14.
10. The Commission invites comments as to the appropriate grouping of rate centres/exchanges to be used for the interchange of traffic in a portability environment, and the trunking arrangements or POIs that should be used for these exchange groupings.

B. Need for wireless carriers to have a CO code in every wireline exchange area where wireless service is available

11. In *Local competition*, Telecom Decision CRTC 97-8, 1 May 1997, the Commission required that competitive local exchange carriers (CLECs) obtain a CO code for each exchange in which they provide service. This requirement permitted the unique identification of each exchange in which CLECs offered local exchange service, and the creation of a location routing number (LRN) and a POI in each exchange where a CLEC offered local exchange service in a number portability environment. However, with Decision 2004-46, POIs are no longer required in each exchange as traffic can be aggregated to a POI serving a number of exchanges in a local interconnection region (LIR).
12. The Commission notes that wireless carriers do not have CO codes and POIs in each exchange covered by their wireless service networks. If wireless carriers were required to obtain CO codes for each exchange covered by their networks there could be, among other things, a significant increase in the demand for CO codes that could potentially cause premature number exhaust in some numbering plan areas (NPAs).
13. The Commission invites comments on the requirement for wireless carriers to obtain a CO code in each exchange covered by their wireless service networks in order to support WNP.

C. Shared CO codes where the carrier of record is an ILEC

14. In the past, wireless carriers obtained telephone numbers from ILECs with whom they were interconnected in order to access the public switched telephone network. These numbers were obtained under Commission-approved ILEC tariffs and they were available in blocks of 1, 10, 100 or 1,000 numbers. The carrier of record for these numbers in both the NPAC SMS³ and the CNA⁴ databases is the ILEC from which the number blocks were obtained.

³ Number Portability Administration Centre Service Management System.

⁴ Canadian Numbering Administrator.

15. With WNP this arrangement will result in a porting request to the wrong carrier in that it will go to the ILEC who is the carrier of record. This will require an ILEC to either act as a conduit for the porting information (similar to reseller porting) or forward the porting request to the correct wireless carrier. In either case, additional effort and time will be required by the receiving ILEC and the required porting interval may not be met.
16. The Commission invites comments as to how this problem should be overcome. For instance, should the telephone number blocks in question be migrated to the wireless provider to whom the telephone number blocks were assigned, and, if so, how should this process be accomplished?

D. Wireless services subject to number porting

17. The PwC Report suggested that wireless services subject to number portability should be limited to dialable two-way, real-time voice communications, such as cellular, personal communications, and enhanced specialized mobile radio including push-to-talk services. As well, the PwC Report recommended that telephone numbers associated with post-paid and pre-paid services should be included.
18. The Commission invites comments as to which wireless services should be subject to WNP.

E. Criteria for denying a wireless porting request

19. In the proceeding initiated by Public Notice 2005-14, some interested parties submitted that there may be some instances where wireless service providers (WSPs) should be permitted to deny customers' requests to port their wireless numbers to another service provider.
20. The Commission invites comments as to whether WSPs should be permitted to deny customers' requests to port their wireless numbers and, if so, under what circumstances should the porting requests be denied, and what process should apply.

F. The applicability of ILEC winback rules for customers whose numbers are ported between wireless carriers and ILECs

21. In a Letter Decision dated 16 April 1998, the Commission put in place rules prohibiting the ILECs from communicating with former customers for the purpose of winning them back once they transferred to another LEC. In subsequent decisions,⁵ the Commission has clarified or changed the ILEC winback rules.
22. In the proceeding initiated by Public Notice 2005-14, some interested parties suggested that the ILEC winback restrictions for customers moving to CLECs should be extended to customers moving to wireless carriers.

⁵ See *Application of the winback rules with respect to primary exchange service*, Telecom Decision CRTC 2002-1, 10 January 2002, *Call-Net Enterprises Inc. v. Bell Canada - Compliance with winback rules*, Telecom Decision CRTC 2002-73, 4 December 2002, *Call-Net Part VII Application - Promotion of local residential competition*, Telecom Decision CRTC 2004-4, 27 January 2004, and *Regulatory framework for voice communication services using Internet Protocol*, Telecom Decision CRTC 2005-28, 12 May 2005, as amended by *Regulatory framework for voice communication services using Internet Protocol*, Telecom Decision CRTC 2005-28-1, 30 June 2005.

23. The Commission invites comments on whether or not the ILEC winback rules should be extended to customers moving to wireless carriers.

G. Wireless carrier access to ILECs' OSS

24. In *Competitive local exchange carrier access to incumbent local exchange carrier operational support systems*, Telecom Decision CRTC 2005-14, 16 March 2005, the Commission instructed Bell Canada and TELUS Communications Inc. (TCI) to develop and implement CLEC access to certain aspects of their OSS within one year. Other ILECs were to provide CLEC access to their OSS when requested, by signing an agreement.
25. The PwC Report suggested that wireless carriers should have access to the ILECs' OSS in order to minimize any customer information errors on requests to port telephone numbers from ILECs.
26. The Commission invites comments as to whether ILECs should be required to permit wireless carriers to access their OSS, and, if so, to what extent and under what terms and conditions.

H. Directory listing information for numbers ported between wireless carriers and LECs

27. Wireline customers' telephone numbers are included in ILEC telephone directories at no charge, unless customers specifically request that their telephone numbers not be listed. Typically, the ILECs' tariffs include a charge for non-published numbers. On the other hand, wireless customers' telephone numbers are not included in ILEC telephone directories unless wireless customers specifically request that their telephone numbers be included in a telephone directory. The ILECs' tariffs typically include a charge to list a wireless number in their telephone directories. Wireless carriers will generally pass this charge through to their customers. Thus, in intermodal porting situations, customers will be faced with different telephone directory listing rules and, potentially, unexpected charges.
28. The Commission invites comments as to how telephone directory listings should be handled for intermodal porting situations.

I. E9-1-1 customer information for numbers ported between wireless carriers and LECs

29. Due to the mobile nature of wireless service, the customer information associated with telephone numbers in the E9-1-1 Automatic Location Identifier (ALI) database can be different for wireline and wireless telephone numbers. As well, in *Conditions of service for wireless competitive local exchange carriers and for emergency services offered by wireless service providers*, Telecom Decision CRTC 2003-53, 12 August 2003, as amended by *Conditions of service for wireless competitive local exchange carriers and for emergency services offered by wireless service providers*, Telecom Decision CRTC 2003-53-1, 25 September 2003, the Commission determined that wireless CLECs should continue to be obligated to implement wireless E9-1-1 where it was available and found that it would not be appropriate to continue to require wireless CLECs to enter subscriber records in ALI databases. The Commission also determined that WSPs were to provide wireless E9-1-1 service to their customers in those communities where it was available from an ILEC.

30. The Commission invites comments as to what customer information should be included in the E9-1-1 databases for intermodal porting situations, and any related changes to database update procedures.

J. Other regulatory issues related to the implementation of WNP

31. The Commission invites comments on any other regulatory issues related to the implementation of WNP that interested parties may wish to bring to the attention of the Commission.

Procedure

32. Aliant Mobility, Aliant Telecom Inc., Bell Canada, Bell Mobility, Bruce Telecom, the CWTA, Cogeco Cable Canada Inc., EastLink, ExaTel Inc., FCS Broadband, Globility Communications Corporation, ISP Telecom Inc., Maskatel inc., MTS Allstream Inc., MTS Mobility, Rogers Cable Communications Inc., Rogers Wireless, Saskatchewan Telecommunications, SaskTel Mobility, Sogetel Mobilité, TBayTel Mobility, Télébec Mobilité, TCI, TELUS Mobility and Vidéotron Télécom ltée are all made parties to this proceeding.
33. Other parties wishing to participate in this proceeding are required to notify the Commission of their intention to do so by **14 February 2006** (the registration date) and to provide their contact information. They are required to do so by contacting the Secretary General by mail at CRTC, Ottawa, Ontario, K1A 0N2, by fax at (819) 994-0218, or by e-mail at procedure@crtc.gc.ca. They are to indicate in the notice their e-mail address where available. If such parties do not have access to the Internet, they are to indicate in their notice whether they wish to receive disk versions of hard copy filings.
34. The Commission will issue on its web site, as soon as possible after the registration date, a complete list of parties and their mailing address (including their e-mail address, if available) identifying those parties who wish to receive disk versions.
35. All parties may file comments with the Commission on any matter within the scope of this proceeding by **27 February 2006**, serving a copy on all parties by that date.
36. All parties may file reply comments with the Commission, serving a copy on all other parties by **6 March 2006**.
37. The Commission will not formally acknowledge comments. It will, however, fully consider all comments and they will form part of the public record of the proceeding.
38. Where a document is to be filed or served by a specific date, the document must be actually received, not merely sent, by that date.
39. Parties can file their submissions electronically or on paper. Submissions longer than five pages should include a summary. Each paragraph of your submission should be numbered.
40. Where the submission is filed by electronic means, the line *****End of document***** should be entered following the last paragraph, as an indication that the document has not been damaged during electronic transmission.

41. The Commission also encourages all parties to monitor the record of this proceeding (and/or the Commission's web site) for additional information that they may find useful when preparing their submissions.

Important notice

42. Note that all information that you provide as part of this public process, except information granted confidentiality, whether sent by postal mail, facsimile, e-mail or through the Commission's web site at www.crtc.gc.ca, becomes part of a publicly accessible file and will be posted on the Commission's web site. This information includes your personal information, such as your full name, e-mail address, postal/street address, telephone and facsimile number(s), and any other personal information you provide.
43. Documents received electronically or otherwise will be put on the Commission's web site in their entirety exactly as you send them, including any personal information contained therein, in the official language and format in which they are received. Documents not received electronically will be available in PDF format.
44. The personal information you provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission, or for a use consistent with that purpose.

Location of CRTC offices

45. Submissions may be examined or will be made available promptly upon request at the Commission offices during normal business hours:

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