



February 27, 2006

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa ON K1A 0N2

Rogers Wireless Inc.
333 Bloor Street East
Toronto, Ontario M4W 1G9
Tel. (416) 935-7211
Fax (416) 935-7719
dawn.hunt@rci.rogers.com

Dawn Hunt
Vice-President
Government & Inter-carrier Relations

Dear Ms. Rhéaume:

Re: Telecom Public Notice CRTC 2006-3 - Regulatory Issues Related to the Implementation of Wireless Number Portability

Summary

1. In this proceeding, the Commission has invited public comments on a number of regulatory issues that relate to the implementation of wireless number portability (WNP) in Canada. Rogers Wireless Partnership (Rogers) is pleased to provide the following comments.
2. Rogers respectfully requests that the Commission deal in an expeditious manner in addressing the issues identified in the Notice. The resolution of these issues is necessary so that wireless and wireline carriers can incorporate the associated outcomes in the planning and development work that must be completed in order to achieve the WNP implementation dates that have been ordered by the Commission.
3. Rogers requests that the Commission order the use of local calling areas (LCAs) as the area within which telephone numbers may be ported between carriers. This would be consistent with the approach used in the United States (US).

4. Wireless carriers should be required to have at least one point of interconnection (POI), one trunk group, one central office (CO) code, and one location routing number (LRN) within each LCA where they will port telephone numbers. Wireless carriers should be permitted to use their existing POIs, trunk groups and CO codes to satisfy these requirements. Wireless carriers should also be permitted to use their existing CO codes for use in the creation of LRNs.
5. Telephone numbers within telephone number blocks that are used by wireless carriers and are supplied from CO codes that are held by incumbent local exchange carriers (ILECs) should be bulk-ported to wireless carriers prior to the launch of WNP. This will ensure that the 2.5-hour porting interval can be achieved when these numbers are ported by customers. This activity should be completed by the end of 2006 so that adequate time will be available for testing.
6. Wireless two-way voice services, including push-to-talk services should be subject to number porting.
7. Wireless carriers should be permitted to deny port requests where the porting customer is unwilling to pay significant outstanding balances, as defined below.
8. The ILEC winback rules should apply whenever an ILEC local exchange customer ports their telephone number to a wireless carrier.
9. Wireless carriers should be provided with access to ILEC Operational Support Systems (OSS) so that the number of delayed or failed wireline to wireless ports can be minimized.

10. Existing practices regarding directory listings and enhanced 9-1-1 (E9-1-1) information should continue to apply to local exchange carriers (LECs) and wireless carriers in a WNP environment.
11. The ILECs and Independent telephone companies should be required to exchange calling name information with wireless carriers so that this call management service will be available to wireless customers.

Introduction

12. Rogers is pleased to provide the following comments in response to ***Telecom Public Notice CRTC 2006-3 – Regulatory Issues Related to the Implementation of Wireless Number Portability*** (the Notice).
13. In the Notice, the Commission has invited public comments on a number of regulatory issues that relate to the implementation of WNP in Canada. Rogers is pleased that the Commission is taking this action, given that the expeditious resolution of these issues is required so that wireless and wireline carriers can reflect the final outcome in the planning and development that is necessary to achieve the WNP implementation dates that have been ordered by the Commission.

Trunking arrangements for the interchange of traffic

14. In Telecom Decision CRTC 2005-72 (Decision 2005-72), the Commission directed carriers to port telephone numbers in accordance with the porting scenarios described in Telecom Public Notice 2005-14 (PN 2005-14). The scenarios directed by the Commission provide that a ported telephone number must maintain its original telephone exchange designation for rating purposes. At the same time, the Commission provided that the

interchange of traffic to and from ported telephone numbers does not need to occur in that original telephone exchange.

15. In paragraph 8 of the Notice, the Commission has restated its previous determinations in the following terms:

“...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.”

16. In light of the Commission’s determinations outlined above, Rogers understands that, for example, when a wireline telephone number associated with a given exchange (e.g., the Orleans exchange) is ported to a wireless carrier, the rating of calls to the telephone number will not change. Rogers also understands that traffic terminating to the ported telephone number may be routed to the wireless carrier’s POI or switch that is located in another exchange (e.g. the Ottawa-Hull exchange). Therefore, while calls to the ported telephone number may be routed to the wireless carrier’s POI or switch in the Ottawa-Hull exchange, these calls will continue to be rated as though they terminate to the Orleans exchange. Rogers understands that this rating and routing treatment will also apply to wireless-to-wireless porting.

17. In the Notice, the Commission has invited comments regarding how the traffic associated with porting in these circumstances should be routed and what trunking arrangements should be used. Specifically, the Commission has invited 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.

18. The Commission has noted the two following examples that are available for aggregating exchanges and POIs: i) local interconnection regions (LIRs); and ii) LCAs.
19. For the reasons outlined below, Rogers requests that the Commission order the use of ILEC LCAs as the area for aggregating exchanges and POIs. Porting wireless carriers should be required to have one POI and one trunk group within each ILEC LCA where they will port telephone numbers. Specifically, the ILEC LCA associated with the ported telephone number should be used.
20. Rogers notes that this would be consistent with the approach used in the US. The Commission is already aware that the US FCC ordered LECs to permit the porting of telephone numbers across rate centre boundaries, in its order regarding porting between wireline and wireless carriers.¹ In footnote 75 of the same order, the FCC clarified that its ruling *“is limited to porting within the LATA where the wireless carrier’s point of interconnection is located, and does not require or contemplate porting outside of LATA boundaries”*.
21. Rogers submits that LATAs are analogous to LCAs. Rogers notes that both of these concepts involve the aggregation of multiple ILEC rate centres into a larger area. In fact, LATAs are somewhat larger and typically include multiple LCAs.
22. With respect to the question regarding which POIs and trunk groups should be used for the interchange of ported traffic, Rogers submits that

¹ Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, FCC 03-284, released November 10, 2003.

wireless carriers should be permitted to use their existing POIs and trunk groups that are located within the LCAs in which porting will occur.

23. Rogers notes that, on previous occasions, the Commission has established the principle that the use of existing POIs should be permitted since a requirement to remove and redeploy POIs may impose unnecessary costs on carriers and, ultimately, consumers.

24. For example, in paragraph 82 of Telecom Order CRTC 98-486 - *Transiting Points of Interconnection*, the Commission states the following in this regard:

“The Commission finds that where the ILEC Gateway POI and the existing ILEC’s WSP POI are at the same location, existing facilities are to be used and the ILEC is to be responsible for its share of the cost for trunking used for bill-and-keep traffic. Where the Gateway POI and the ILEC’s WSP POI are not at the same location, and the existing facilities are appropriate and adequate for WSP/CLEC to ILEC interconnection, the existing facilities should be used.”

25. Similarly, in paragraph 75 of Telecom Decision CRTC 2004-46 – *Trunking Arrangements for the Interchange of Traffic and the Point of Interconnection Between Local Exchange Carriers*, the Commission states the following:

“In respect of existing POI arrangements, since the cost to remove and redeploy POIs may be more expensive than retaining them and may be particularly burdensome for CLECs, the Commission considers that the existing POIs should remain in place until such time as a CLEC wishes to alter them.”

26. Rogers requests that the Commission permit wireless carriers to use their existing POIs and trunk groups that are located within the LCAs in which porting will occur.

Need for wireless carriers to have a CO code in every wireline exchange

27. In the Notice, the Commission has noted that CLECs are required to obtain a CO code for each exchange in which they provide service and that CLECs have used their CO codes to create a LRN in each exchange.

28. In contrast, wireless carriers do not have CO codes for each exchange covered by their networks. In the proceeding initiated by PN 2005-14, a number of parties noted that a requirement for wireless carriers to obtain a CO code in every ILEC exchange where number portability is implemented will directly contribute to the premature exhaust of available CO codes in certain numbering plan areas (NPAs). This outcome would not be in the public interest.

29. Rogers respectfully submits that wireless carriers should not be required to have a CO code in each exchange. Indeed, no such requirement is necessary to successfully implement WNP. Instead, wireless carriers should be required to have one CO code within each LCA where they will port telephone numbers. Further, wireless carriers should be permitted to use their existing CO codes to satisfy this requirement.

30. Rogers notes that LRNs are used to ensure that calls which terminate to ported telephone numbers are routed to the correct switch. In paragraph 61(iii) of Decision 2005-72, the Commission notes that LRNs can be located in an exchange other than the exchange associated with the ported telephone number. In other words, a wireline telephone number associated with one exchange (e.g. Orleans), can be routed to a LRN that

is associated with another exchange (e.g. Ottawa-Hull). Rogers understands that the assignment of LRNs that are located in an exchange other than the exchange associated with the ported telephone number will not pose any issues to the Number Portability Administration Centre (NPAC).

31. The Commission states in footnote 10 of Decision 2005-72, that the LRN selection criteria in Appendix E of the Canadian CO Code (NXX) Assignment Guidelines (COCAGL) were last modified on October 10, 2002. Rogers submits that Appendix E contains two provisions that are unnecessarily restrictive in a WNP environment and that should be modified.

32. Specifically, criterion 3 of Appendix E requires that *“at least one LRN shall be selected for each ILEC exchange area served by that switch and in which LNP is provided by that switch.”* Rogers submits that the words *“by a local service provider”* should be inserted between the words *“selected”* and *“for”* in the statement above. Further, the following statement should be added to this criterion:

“A wireless carrier receiving a ported number must assign at least one LRN for each Local Calling Area (LCA) served by its LNP capable recipient switch and in which LNP is provided by that switch.”

33. Criterion 4 of Appendix E requires that *“a local service provider receiving a ported number must assign to that ported number an LRN associated with the ILEC exchange area in which the number resides.”* Rogers submits that the following statement should be added to this criterion:

“A wireless carrier receiving a ported number must assign to that ported number a LRN associated with an exchange that is located within the same LCA in which the number resides.”

34. Rogers notes that the modifications recommended above would better reflect and accommodate the Commission’s determinations respecting the interchange of traffic and LRNs in a WNP environment.

35. These changes would also be consistent with the current version of LRN assignment practices that have been approved in the US, where porting across rate centre boundaries has been permitted since November 2003. Specifically, the Industry Numbering Committee (INC) LRN assignment practices state in part:

“An LRN is a 10-digit number, in the format NPA-NXX-XXXX, that uniquely identifies a switch or point of interconnection (POI) per LATA.”

“A service provider should select and assign one (1) LRN per LATA for its switch/POI coverage area. Any other LRN would be for internal purposes. Additional LRNs should not be used to identify US wireline rate centers.”

“Shared service provider NPA-NXXs should not be used for LRN assignments.”²

36. Rogers notes that the US guideline explicitly provides that LRNs should be assigned on a per-LATA basis, and should not be assigned on a per-rate centre basis. As noted above, LATAs are analogous to LCAs and both concepts involve the aggregation of multiple rate centres into a larger

² ATIS-0300065, INC LRN Assignment Practices, January 23, 2004.

area. Typically, LATAs are larger areas that encompass multiple LCAs. Rogers respectfully requests that the Commission order that Appendix E of the COCAGL be modified as outlined above. Wireless carriers should be required to have one CO code in each LCA where they will port telephone numbers, and should be permitted to use their existing CO codes to satisfy this requirement.

37. Rogers requests that the Commission's order clearly state that wireless carriers will assign one LRN for each LCA in which WNP is implemented and that existing CO codes may be used to create such LRNs.

Shared CO codes where the carrier of record is an ILEC

38. In the Notice, the Commission has identified a problem that exists for shared CO codes where the carrier of record is an ILEC. Specifically, the problem relates to the fact that, in some cases, wireless carriers have obtained telephone numbers in blocks of 1, 10, 100 or 1,000 numbers from the ILECs. The carrier of record for these numbers in the NPAC Service Management System (SMS), the Local Exchange Routing Guide (LERG), and the Canadian Numbering Administrator (CNA) databases is the ILEC that supplies the numbers.

39. The Commission has correctly identified that porting requests associated with these numbers will be directed to the wrong carrier (the ILEC), rather than the carrier serving the porting customer (the wireless carrier) and that additional time and effort will be required to port such numbers. If this problem is not addressed, it will jeopardize the ability of carriers to satisfy the 2.5-hour porting interval that the Commission has ordered. The failure of carriers to meet the 2.5-hour porting interval will result in customer confusion and dissatisfaction. This would not be in the public interest.

40. Rogers notes that the WNP report and implementation plan prepared by PricewaterhouseCoopers (PwC) on behalf of the Canadian Wireless Telecommunications Association (CWTA) highlighted this issue as the cause of widespread customer dissatisfaction in the US, following the launch of WNP by US wireless carriers.
41. In the interest of achieving an industry consensus approach to this problem, and in order to avoid the widespread disruption that was experienced in the US, Rogers commissioned the preparation of a report outlining this issue, the possible approaches, and the recommended solution. The report was prepared by a third party with first hand experience in resolving the problems created by shared CO codes during the implementation of WNP in the US. The report was shared with the CWTA Shared NXX Work Stream.
42. A consensus on some of the issues related to shared CO codes was achieved within the CWTA. Unfortunately, a consensus on certain other significant issues has not been achieved.
43. Rogers strongly believes that the preferred solution to the problem of shared CO codes is to bulk-port all telephone numbers within shared CO codes to the wireless carriers before WNP is launched. Further, this activity should be completed by the end of 2006 so that adequate time will be available afterwards for intracarrier and intercarrier testing. This solution would also provide that all numbers that become inactive following the launch of WNP will be returned to the CO code holder (the ILEC), using the snap-back process that exists for LNP.
44. Taking this action will ensure that the widely reported customer dissatisfaction that was seen when WNP was implemented in the US will be avoided in Canada. It is important to note that the quantity of wireless

telephone numbers in shared CO codes in Canada is significant and has been estimated to be approximately 5 Million telephone numbers. This is approximately five times greater than the number of telephone numbers that were within shared codes in the US, when WNP was implemented.

45. Rogers notes that the other available options do not address the problem caused by shared CO codes before WNP is implemented. Therefore, these options carry a much greater risk of customer dissatisfaction, which would not be in the public interest.
46. Rogers believes that an industry consensus was not achieved for all of the issues arising from shared CO codes because of the vested interest that the ILECs and their wireless affiliates have in maintaining the *status quo* for as long as possible. These carriers would prefer to defer the porting of these numbers to wireless carriers until after the implementation of WNP, and only as required.
47. The reasons for this are as follows. First, the ILECs currently receive recurring revenues from wireless carriers in the form of monthly telephone number charges. Once the telephone numbers are ported from the ILECs to the wireless carriers, the ILECs may no longer be entitled to these charges. Second, the ILEC-affiliated wireless carriers typically have more telephone numbers within shared codes than other wireless carriers. Therefore, if all such numbers are ported before WNP is implemented, the ILEC-affiliated wireless carriers will incur more porting charges than other wireless carriers.
48. Rogers submits that the public interest in proceeding on the basis of the preferred solution proposed by Rogers far outweighs the incremental cost that this solution will impose on the ILECs and their wireless affiliates. This solution will result in the most favorable porting experience for

customers that have telephone numbers within shared codes.

Accordingly, Rogers requests that the Commission order the use of the solution described in paragraph 43 above.

Wireless services subject to number porting

49. Rogers fully supports the scope of wireless services that should be subject to number portability, as outlined in the PWC report. Specifically, Rogers believes that number portability should be limited to dialable two-way, voice communications associated with a 10-digit telephone number, such as cellular, personal communications services, and enhanced specialized mobile radio including push-to-talk services. Rogers also agrees that post-paid and pre-paid services should be included.

Criteria for denying a wireless porting request

50. In the Notice, the Commission has invited comments regarding whether wireless carriers should be permitted to deny customers' requests to port their wireless numbers and, if so, under what circumstances the porting requests should be denied, and what process should apply.

51. Rogers respectfully submits that wireless carriers must be permitted to deny customer requests to port their wireless numbers in certain circumstances. Rogers believes that there are two circumstances in which wireless carriers should be permitted to deny port requests.

52. First, wireless carriers should be permitted to deny port requests associated with suspended or disconnected wireless telephone numbers. Rogers notes that this would be consistent with an industry consensus

that the Commission has approved for use in the context of local number portability (LNP).³

53. Second, wireless carriers should be permitted to deny port requests associated with wireless accounts with significant outstanding balances. While no such provision currently exists in the context of LNP, Rogers notes that the average monthly bill of wireless customers is typically much higher than the average monthly bill of local service customers. In addition, wireless customers typically sign term contracts, with termination penalties which reflect the handset subsidies which are customary in the wireless industry. Since the combined total of these outstanding charges typically will far exceed the outstanding balance of a local service customer, a special provision to permit the denial of ports in these circumstances is warranted.

54. Rogers believes that this provision can be accommodated within the intercarrier porting process that is currently being developed by the industry. Customers who promptly pay any such outstanding balances can expect to be successfully ported. Customers that are unwilling to pay their outstanding balance will forfeit their right to port their telephone number.

55. Absent this provision to deny port requests, the wireless carriers' ability to collect all such outstanding balances will be greatly diminished. Given the already significant degree of fraud that is perpetrated against wireless carriers, any reduction in the ability of wireless carriers to recover these amounts would be unacceptable and must be avoided.

³ CRTC Industry Steering Committee (CISC) Consensus Report, Porting of Suspended or Disconnected Telephone Numbers, BPRE025a.doc, December 12, 2001.

56. Rogers proposes that the threshold for determining whether a port may be denied should be \$150. A customer unwilling to pay an outstanding balance equal to or greater than \$150 should not be permitted to port their telephone number.

Applicability of ILEC winback rules

57. As the Commission has noted in paragraph 21 of the Notice, the ILEC winback rules have been established, clarified and modified in a series of Commission decisions. In summary, the rules prohibit the ILECs from contacting customers that have ported their local service to a competitor. In the case of a residential local service customer, the ILEC cannot contact the customer regarding any services for a period of 12 months. In the case of a business local service customer, the ILEC cannot contact the customer regarding local service for a period of 3 months.

58. Rogers notes that the Commission imposed the winback rules so that the ILECs, and their affiliates, would not be able to use their control of, and access to, customer specific information to win back customers before their service is transferred to a competitor.

59. Rogers respectfully submits that, absent the application of the winback rules when ILEC local customers port their telephone numbers to wireless carriers, the ILECs will use their control of, and access to, customer specific information to win back these customers. This will have the effect of curtailing the extent to which ILEC local customers will port their numbers to wireless carriers and would be counterproductive to the federal government's directive, and to Decision 2005-72, which require that porting between wireline and wireless carriers must be included in the implementation of WNP so that customers will have the widest possible choice of service providers to meet their needs.

60. Rogers requests that the Commission extend the ILEC winback rules to ILEC local customers that port their telephone numbers to a wireless carrier.

Wireless carrier access to ILEC OSS

61. In the Notice, the Commission has invited comments regarding whether the ILECs should be required to permit wireless carriers to access their OSS, and, if so, to what extent and under what terms and conditions.

62. The Commission has previously instructed certain ILECs to develop and implement CLEC access to certain aspects of their OSS. Other ILECs were to provide CLEC access to their OSS when requested, by signing an agreement. CLEC access to ILEC OSS was ordered by the Commission, among other things, to minimize customer information errors on requests to port telephone numbers from ILECs. This in turn would minimize the number of failed ports.

63. Rogers submits that the potential for customer information errors on requests to port wireline telephone numbers from ILECs will be as significant for wireless carriers, as it has been for CLECs. Wireless carriers will require accurate ILEC customer status information in order to successfully port such customers, and they will have no other means to satisfy this requirement than access to ILEC OSS. Customer information errors will result in rejected port requests and customer dissatisfaction and, therefore, would not be in the public interest. It is important to note that rejected port requests and customer dissatisfaction will also result in increased costs for all of the carriers involved.

64. Rogers further submits that wireless carriers will require access to trouble ticket systems so that porting related errors can be reported, tracked and addressed in a timely manner.
65. Rogers respectfully requests that the Commission permit wireless carriers to access ILEC OSS on the same basis, and under the same terms and conditions, as such access is provided to CLECs. This action is necessary to minimize the number of delayed or failed ports from wireline to wireless carriers. Specifically, wireless carriers require access to ILEC customer status information in order to minimize customer information errors and failed ports. Wireless carriers also require access to trouble ticket systems so that porting related errors can be addressed in a timely manner.

Directory listing information for ported numbers

66. The Commission has invited comments regarding how telephone directory listings should be handled for intermodal porting situations. The Commission has noted that the issue of directory listings is treated differently by wireline and wireless carriers.
67. Specifically, wireline customers' telephone numbers are included in the ILEC telephone directories at no charge, unless customers specifically request that their telephone numbers not be listed. On the other hand, wireless customers' telephone numbers are not included in the ILEC telephone directories unless wireless customers specifically request that their telephone numbers be included in a telephone directory. These practices have been developed on the basis of past Commission decisions and, in the case of wireless telephone numbers, an Order in Council.

68. Rogers submits that the treatment of wireline and wireless directory listings does not require modification with the implementation of WNP. Telephone numbers of customers that port from a wireless carrier to a wireline carrier should be included in ILEC telephone directories at no charge. Telephone numbers of customers that port from a wireline carrier to a wireless carrier should not be included in ILEC telephone directories unless the wireless customer specifically requests that their telephone number be included in the directory. The treatment employed should be determined by the nature of the service to which the customer is ported.

E9-1-1 customer information for ported numbers

69. The Commission has invited comments regarding what customer information should be included in the E9-1-1 databases for intermodal porting situations, and any related changes to database update procedures. The Commission has noted that the information in the E9-1-1 Automatic Location Identification (ALI) database is different for wireline and wireless carriers.

70. Specifically, wireline customer information is added to the ALI database, whereas wireless cell site/sector information, not wireless customer information, is added to the ALI database.

71. Rogers submits that the treatment of wireline and wireless E9-1-1 ALI database information does not require modification with the implementation of WNP. Information associated with customers that port from a wireless carrier to a wireline carrier should be entered in the ALI database. Information associated with customers that port from a wireline carrier to a wireless carrier should not be entered in the ALI database. As with directory listings, the treatment employed should be determined by the nature of the service to which the customer is ported.

Other regulatory issues

72. In the Notice, the Commission has invited comments on any other regulatory issue related to the implementation of WNP.
73. Rogers submits that the implementation of WNP presents an opportunity to make a popular call management service available to wireless customers. Specifically, Rogers notes that wireline local service customers are currently able to benefit from an advanced call management service known as calling name identification. Calling name identification is a call management service that allows the called party to see the name of the calling party displayed with each telephone call. This service is similar to calling line identification service, which allows called parties to see the 10-digit telephone number of the calling party. Both of these services have been made possible by the implementation of advanced network signaling capabilities, such as CCS7 signalling, which were implemented in major telecommunication networks in Canada in the 1990's.
74. Wireless carriers were provided with access to advanced call management services when the Commission ordered the provision of CCS7 signalling and trunkside wireless access interconnection service, in Telecom Order CRTC 2000-395, *Providing Trunk-Side Access And Common Channel Signalling #7 To Wireless Service Providers*. On the basis of this Order, the ILECs have agreed to exchange the calling line identification parameter with wireless carriers. Certain ILECs have also agreed to exchange the calling name parameter with wireless carriers. However, some ILECs have refused to exchange the calling name parameter with wireless carriers and have taken the position that only ILECs are entitled to the exchange of this parameter.

75. Rogers notes that in Telecom Order CRTC 98-40, the Commission found that the Stentor member companies that exchange the calling name parameter would be conferring an undue preference on themselves if the parameter is not also delivered to other carriers. It is important to note that the Commission did not explicitly limit the application of this principle to LECs, nor has it explicitly precluded the provision of the calling name parameter to wireless carriers in any other decision.
76. In paragraph 30 of Decision 2005-72, the Commission expressed the view that *“customers should be given the widest possible choice of service providers to meet their needs, and that there should be minimal inconvenience, risk and related costs when changing service providers.”*
77. With the implementation of WNP, including porting between wireline and wireless carriers, making the calling name parameter available to wireless carriers would provide customers with choice and convenience, and it would permit wireless carriers to more effectively compete in the Canadian telecommunications market.
78. Rogers respectfully requests that the Commission order LECs and Independent telephone companies to exchange the calling name parameter with wireless carriers on the basis of existing CCS7 signaling and wireless access service interconnection that is provided to wireless carriers. The requested order should take effect at the earliest possible date.

Conclusion

79. Rogers respectfully requests that the Commission deal in an expeditious manner in addressing the issues that are under consideration in this proceeding. The resolution of these issues is necessary so that wireless and wireline carriers can incorporate the associated outcomes in the planning and development work that must be completed in order to achieve the WNP implementation dates that have been ordered by the Commission.

80. Rogers requests that the Commission order the proposals advanced by Rogers above, so that WNP can be implemented to the greatest extent possible, in a manner that will minimize customer dissatisfaction and that will provide customers with the widest possible choice of service providers to meet their needs.

Sincerely,



 Dawn Hunt

DH/jt

cc: Interested Parties Telecom Public Notice CRTC 2006-3

End of Document