



**Teresa Griffin-Muir**

Vice President, Regulatory Affairs  
Vice-présidente des Affaires réglementaires  
MTS Allstream Inc.

27 February 2005

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

Dear Ms. Rhéaume:

Subject: Commission Reference No: 8620-C12-200601288  
Telecom Public Notice CRTC 2006-3 – Regulatory issues related to the  
implementation of wireless number portability

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1. Pursuant to the directions on procedure in paragraph 35 of *Regulatory issues related to the implementation of wireless number portability*, Telecom Public Notice CRTC 2006-3, 6 February 2006 (PN 2006-3), MTS Allstream Inc. (MTS Allstream) files the following comments.
  
2. In PN 2006-3, the Commission has invited comments on several remaining issues related to the implementation of wireless number portability (WNP) amongst wireless carriers and between wireless and wireline local exchange carriers. At paragraph 6 of PN 2006-3, the Commission has invited 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.
3. MTS Allstream notes that the above issues were identified in the PricewaterhouseCoopers (PwC) WNP Implementation Plan, entitled *Implementation of Wireless Number Portability: Setting a New world-Class Standard* dated September 9, 2005 (the PwC Report) and are largely issues related to intermodal porting scenarios.
4. Clearly, this is a very significant undertaking for both wireline and wireless carriers to implement - essentially within the next 12 months. It is critical that there be certainty concerning all rules that will apply going forward. MTS Allstream submits that existing regulatory rules and processes should be used wherever they can be employed and where there is no apparent reason for change. Among other benefits, this approach will minimize the possibility of implementation delays.
5. MTS Allstream notes that at paragraph 29 of Decision 2005-72<sup>1</sup> the Commission stated that it recognized that extending number portability system access to wireless carriers

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<sup>1</sup> *Implementation of wireless number portability*, Telecom Decision CRTC 2005-72, issued 20 December 2005.

would alter the regulatory framework for local competition established in Decision 97-8<sup>2</sup>, but considered that such access would be in accordance with its principle of technological neutrality, and that technological neutrality would result in an increased level of competition in both the local exchange and wireless markets. At paragraph 32 of Decision 2005-72, the Commission also agreed with one of the fundamental pillars in the PwC Report, the use of existing LNP infrastructure for WNP implementation. MTS Allstream endorses this approach and agrees that doing so would permit pooling of resources, avoid duplicating effort and cost, and aid in the timely implementation of WNP.

6. The Commission confirmed that the porting scenarios outlined in *Implementation of wireless number portability*, Telecom Public Notice CRTC 2005-14, 16 September 2005, are appropriate for porting activities between Canadian carriers. MTS Allstream notes that the Commission has already confirmed in this regard that the porting of a telephone number between wireline-based carriers and wireless carriers is permitted as long as the telephone number maintains its original telephone exchange/rate centre designation for rating purposes.
7. MTS Allstream submits that the implementation of the competitive objectives of the Commission will be best achieved if the implementation of WNP is technologically and competitively neutral and efficient from both a cost and time perspective. With these criteria in mind MTS Allstream developed the recommendations that follow. In MTS Allstream's view, most of the issues relating to WNP can be resolved through the application of existing regulatory rules.
  - A. **The trunking arrangements for the interchange of traffic between wireless carriers and LECs in a portability environment**
8. MTS Allstream submits that the rules for aggregated exchanges and points of interconnection (POIs) based on local interconnection regions (LIRs) established by the

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<sup>2</sup> *Local Competition*, Telecom Decision CRTC 97-8, issued 1 May 1997.

Commission 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) are reasonable, and that these rules and arrangements should also be used for the interchange and routing of traffic between LECs and wireless carriers in a portability environment.

9. Local exchange carriers are already using LIRs for the interchange of traffic with wireline carriers. In MTS Allstream's view, there is no reason that these arrangements cannot also be used for the interchange of traffic between wireless carriers and between wireline and wireless carriers. The Commission's intent in establishing POIs based on the consolidation of exchanges to form large LIRs, was to implement a technologically neutral framework that encouraged efficient and effective interconnection arrangements for the benefit of all carriers and their customers. The use of POIs and LIRs are already well understood, workable and are presently used by LECs.
10. In MTS Allstream's view consideration of any other trunking arrangements could result in delays, technical complexities and be more costly. All these factors could impact the timely development, testing and implementation of WNP without any obvious benefit to competition or consumers.

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

11. The concept of serving area boundaries was addressed in Telecom Decision 97-8, and requires a CO code to identify porting boundaries and whether or not a number can be ported within specific wireline exchange area. Wireless carriers should be required to have a CO code in every wireline exchange area where a wireless carrier provides service and desires to port numbers with a wireline carrier.

12. It is MTS Allstream's view that WNP should function as seamlessly as practicable, which will be more easily accomplished if the same LEC-to-LEC LNP porting boundaries and porting rules apply to all carriers porting wireline numbers to wireless and vice versa.

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

13. Wireless carriers currently obtain blocks of telephone numbers from ILECs, which introduces a certain degree of complexity to the WNP process. The carrier of record for these numbers in the Canadian Number Portability Administrations Centre Service Management System (NPAC SMS) and the Canadian Number Administrator (CNA) databases is the ILEC from which the number blocks were obtained. The ILEC owning these CO codes also has the local routing number (LRN) associated with these codes. Therefore, unless these blocks of numbers are assigned to the WSP along with an LRN, all porting requests for these numbers would have to come through the ILEC to avoid rejection.
14. To address this issue, MTS Allstream proposes that where an ILEC has assigned numbers to a WSP prior to the implementation of WNP, the ILEC bulk port these blocks of numbers to the WSP to which the numbers were assigned. The bulk porting responsibility should apply to the entire block of numbers, including those not currently activated. This will ensure that the correct carrier is recorded in the NPAC SMS database and will avoid porting fall-outs or porting failures arising from currently shared CO codes.
15. In addition, to facilitate routing under this scenario, a new LRN must be assigned to each block that is ported. This may require that the WSP have trunk-side interconnection into each of the ILEC local exchanges with which the numbers are associated. Over the longer term, this requirement should not prove too onerous as all WSPs currently have CLEC status.
16. While there may be shared CO codes of smaller rural areas where LNP does not exist, the requirement for the bulk porting numbers should only be required when WNP is introduced in those areas.

17. Decision 2005-72 permits wireless carriers to directly access NPAC SMS for the purpose of porting numbers. Relations with the NPAC SMS vendor (Neustar) are administered by the Canadian Local Number Portability Consortium (CLNPC). To effect WNP, wireless carriers will require their own service provider ID (SPID) from the CNA. To effect bulk porting, carriers will need to make arrangements and settle on NPAC SMS pricing for bulk porting through discussions with the CLNPC.
18. MTS Allstream notes that the bulk porting solution will, over the long term, minimize the costs associated with porting failures, as well as ensure that both wireline and wireless carriers are involved in porting on an equivalent basis that is both technologically and competitively neutral.

**D. Wireless services subject to number porting**

19. The Commission invited comments as to which wireless services should be subject to WNP. MTS Allstream agrees with the PwC Report that the wireless telephone services in respect of which telephone numbers should be subject to wireless number portability should be limited to dialable two-way real-time voice communications, such as cellular, PCS that operate using analog AMPS; second generation digital technologies (such as TDMA, CDMA or GSM); and 2.5G and 3G technologies (such as GPRS, UMTS and EVDO), and ESMR dialable two way services. The telephone numbers associated with pre-paid and post-paid services will also be portable.

**E. Criteria for denying a wireless porting request**

20. MTS Allstream supports the existing industry rules for determining whether a number is portable between local service providers, as set out in the Canadian Local Ordering Guidelines (CLOG) Version 5-2, Local Service Ordering Overview, Section 2.17, issued December 8, 2005. These rules require wireline LECs to port a telephone number unless the telephone number has been suspended or disconnected and is no longer a working number.

21. MTS Allstream recognizes that, given the nature of the wireless industry, there may be other instances where WSPs could be permitted to deny customers' requests to port their wireless numbers to another service provider. Examples of these instances are included in the recommendations of the CWTA. Should the Commission agree with the views of the CWTA in this respect, MTS Allstream submits that the same rules should apply to all wireless carriers.

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

22. MTS Allstream submits that winback rules should not be a feature of any framework associated with the implementation of WNP. There is no need for winback restrictions to apply to customers who port numbers from an ILEC to a wireless carrier.

23. Winback restrictions apply only when a customer is transferred between a dominant wireline incumbent and a non-dominant wireline service provider in the wireline services market. The wireless market is a distinct and very different market from wireline. Unlike the wireline market, there is no single dominant provider within a specific operating territory. On the contrary, the wireless industry is already competitive with well established providers, each having significant market shares. In MTS Allstream's view winbacks are not an issue that affects the implementation or future effectiveness of WNP or consumer choice in the wireless market.

**G. Wireless carrier access to ILECs' OSS**

24. The Commission has sought comment on whether ILECs should be required to permit wireless carriers to access their OSSs for the purposes of porting telephone numbers and, if so, to what extent and under what terms and conditions.

25. MTS Allstream does not believe that wireless carrier access to ILECs' OSS systems is required for the effective implementation of WNP, and submits that wireless carrier

access of an ILEC that has not developed and implemented CLEC access to their OSS databases outside of the conditions of *Competitive local exchange carriers access to incumbent local exchange carrier operations support systems*, Telecom Decision CRTC 2005-14, 16 March 2005 (Decision 2005-14) should not be automatically required.

26. In the proceeding that led to Decision 2005-14, CLECs had only sought access to Bell Canada's and TELUS' OSS. The Commission expressed the view that it is not in the public interest to require ILECs, with the exception of Bell Canada and TELUS, to provide access to their OSS until there is demand for the service, in view of the fact that developing and implementing CLEC access to their OSS would be a costly and resource-consuming undertaking.<sup>3</sup> In that decision the Commission did however establish a process that should be followed in the event a CLEC wished to have access to the OSSs of the other ILECs.<sup>4</sup>
27. At this juncture it is expected that the vast majority of WNP porting will be wireless-to-wireless, with low demand for wireline-to-wireless ports (and vice versa). In addition, the porting requests will generally not be accompanied by a request for an access facility such as an unbundled loop. This will greatly simplify the process relative to wireline.
28. Given these factors, MTS Allstream is of the view that OSS access is not required at this time. If circumstances eventually warrant a request for OSS access, such a request should be provided for assessment in the same format required by CLEC Access to ILEC's Operational Support Systems, Report to the CRTC by Industry Working Group – Operational Support Systems (Ad Hoc), File OSRE002a, 16 May 2005, and the Section 12 of Canadian Local Ordering Guide (CLOG) Version 5.

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<sup>3</sup> See paragraph 23 of Decision 2005-14.

<sup>4</sup> See paragraph 52 of Decision 2005-14. The Commission directed that Aliant Telecom, MTS Allstream and SaskTel only be required to develop and implement CLEC access to their OSSs if a CLEC indicates its willingness, by signing an agreement of intent, to access their respective OSS database. The Commission directed within 30 days of signing an agreement of intent with a CLEC, the affected ILEC must file with the Commission an implementation plan for CLEC access to its OSS databases.



29. The question of whether or not a wireless carriers' access is warranted for other ILECs should be deferred until actual requests are received from a wireless carrier that provides a forecast of the volume of service requests for number ports and other information that may be necessary to respond to a request for access to an ILEC's OSS database for the purpose of porting telephone numbers alone.

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

30. MTS Allstream supports the CWTA recommendations that current directory listing practices and rules should continue to apply unchanged. A customer moving a number from a wireline to a wireless service provider has the option to continue to have a directory listing subject to existing tariff rates for an "extra listing". Wireless carriers should be responsible for the listing of their customer's telephone number if this is the desire of their customer, and it will be the wireless carriers' business decision if they pass charges on to their customer. The wireless carrier should be responsible for informing customers that port a wireline number from a LEC about any directory options that may be available through the wireless service provider. MTS Allstream agrees with the CWTA that there is no need for any change to any existing practices.

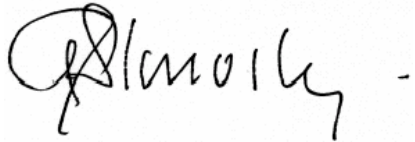
**I. Enhanced 9-1-1 (E9-1-1) customer information for numbers ported between wireless carriers and LECs**

31. In *Conditions of service for wireless competitive local exchange carriers and for emergency services offered by wireless service providers*, Telecom Decision 2003-53, 12 August 2003 (Decision 2003-53), the Commission determined that wireless service providers were not required to enter their subscriber record information into 9-1-1 ALI databases. MTS Allstream supports the recommendation of the CWTA that where a customer ports a LEC number to a wireless service provider, the customer's information should be removed from the ALI database. This is consistent with current practices. For intermodal porting situations where a wireless customer has their number ported to a wireline LEC, existing processes and rules require that the receiving LEC collect

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accurate customer information and provide the customer record to the ILEC consistent with current 9-1-1 interconnection agreements. MTS Allstream submits there are no changes required to any existing practices or ILEC database update procedures associated with the implementation of WNP.

Yours truly,

A handwritten signature in black ink, appearing to read "T. Griffin-Muir", with a small dash at the end.

For Teresa Griffin-Muir  
Vice President, Regulatory Affairs

cc: Interested Parties to PN 2006-3

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