

June 16, 2006

*via email*

Mr. Len Katz  
Executive Director,  
Broadcasting and Telecommunications  
Canadian Radio-television and  
Telecommunications Commission  
1 Promenade du Portage  
Gatineau, QC  
J8X 4B1

Dear Mr. Katz:

**RE: Implementation of wireless number portability Telecom Public Notice CRTC 2006-3**

Wireless networks rely on a variety of numbering resources to uniquely identify subscribers and their terminal equipment. The introduction of WNP necessitates the removal of the historical linkage between two of those numbers – the Mobile Identification Number (MIN) and the Mobile Directory Number (MDN). Once this separation has occurred, MINs must be administered and assigned to individual wireless carriers.

In a letter dated February 24, CWTA requested the Canadian Numbering Administration Consortium accept the responsibility for the administration of MINs and include the task as part of the Canadian Numbering Administrator duties. The Canadian Steering Committee on Numbering (CSCN) also initiated CSCN TIF 67 in order to develop guidelines for the administration and assignment of groups of MINs called MIN Block Identifiers (MBIs). These guidelines include procedures for creating an inventory of numbering resources currently used by wireless carriers as MINs – a process known as “grandfathering”.

At a meeting held on April 6, 2006, the CNAC Board of Directors conditionally accepted the task of administering MBIs. This acceptance is subject to receiving specific direction from the CRTC to perform this function.

In order to meet the aggressive implementation date set by the Commission, the wireless industry must commence the grandfathering process as soon as possible. Under the process developed by the CWTA WNP Implementation Task Force, the CNA, and the CSCN, wireless carriers that require MINs must submit a complete inventory to the Administrator by July 14, 2006.

To ensure the Administrator can actually perform the task that the wireless carriers require, the CNA must formally take on the role of MBI Administrator. Further, the CWTA would highlight the importance of the active participation of all Canadian wireless carriers in the implementation of WNP. The MIN grandfathering process is one more example of the need for all wireless carriers to be engaged in the process.

CWTA notes that it has previously requested the Commission contact all wireless carriers regarding their WNP obligations. Despite the letter sent to cellular/PCS licencees, and the efforts of CWTA, there are a number of wireless carriers that have not become involved in the WNP implementation activities. The CWTA WNPITF has identified two specific carriers – CityWest and Superior Wireless – that are expected to be “trading partners”<sup>1</sup> but have not participated in any of the industry or CISC processes.

In light of the above, CWTA requests the Commission direct the CNA to perform the role of MBI Administrator. The CWTA also requests that the Commission notify all Canadian wireless carriers of their obligations with respect to WNP, and in particular as it relates to MBI Administration. Given the aggressive schedule set by the Commission, CWTA requests the Commission act as expeditiously as possible.

Sincerely,

*Filed electronically*

J. David Farnes  
Vice President,  
Industry and Regulatory Affairs

Cc: Doug Birdwise; Chair, CSCN  
Parke Davis, President, CNAC  
Bill Mason; CRTC  
Glenn Pilley; Director, CNA

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<sup>1</sup> The CWTA WNPITF uses the term “trading partner” to describe a carrier that will have numbers ported into or out of their network.