



Telecom Decision CRTC 2004-61

Ottawa, 27 September 2004

Relief plan for area code 514

Reference: 8698-C12-10/00

In this decision, the Commission addresses three recommendations put forth by the CRTC Interconnection Steering Committee Numbering Plan Area 514 Relief Planning Committee (the RPC). The Commission denies the RPC's recommendation relating to the introduction of various announcement texts to be used by all telecommunications service providers during the permissive and mandatory 10-digit local dialing periods. The Commission directs the RPC to file, by 1 November 2004, a revised relief implementation plan, which must include the standard announcement texts that were approved by the Commission in CRTC Interconnection Steering Committee – Consensus Items, Telecom Decision CRTC 2002-15, 13 March 2002.

The Commission approves the RPC's recommendation to defer the relief date for area code 514. The phasing-in period for the permissive 10-digit local dialing announcement shall commence 17 June 2006 and end 24 June 2006, and the phasing-in period for the mandatory 10-digit local dialing announcement shall commence 28 October 2006 and end 4 November 2006. The Commission directs the Canadian Numbering Administrator to request a special Numbering Resource Utilization Forecast survey to capture all known and anticipated demand for each of the next 24 months, in order to identify any advancement in the projected date for exhaust of available telephone numbers in area code 514. The results of this survey are to be filed with the Commission by 3 December 2004.

The Commission denies the RPC's recommendation that 10-digit local dialing be introduced in area code 450 coincident with the introduction of 10-digit local dialing in area code 514. The Commission announces its intention to initiate a public proceeding to examine the issue of expanding 10-digit local dialing to include area codes that are not undergoing area code relief, including area code 450.

Background

1. In *New area code overlay to be introduced in 514 region*, Order CRTC 2000-1187, 22 December 2000, amended by *Correction to Order CRTC 2000-1187*, Order CRTC 2000-1187-1, 5 January 2001 (Order 2000-1187), the Commission approved the CRTC Interconnection Steering Committee (CISC) ad hoc Numbering Plan Area 514 Relief Planning Committee's (the RPC's) recommendation to introduce a new area code using the overlay method, in all exchanges in area code 514, on 7 June 2003. The Commission directed that 10-digit local dialing in area code 514 commence on a permissive basis on 18 January 2003, and that mandatory 10-digit local dialing be implemented on 7 June 2003. The Commission further directed the RPC to develop and submit to the Commission a relief implementation plan (RIP) that reflected the Commission's determinations in this order.

2. On 25 April 2001, the RPC submitted *NPA 514 Relief Implementation Plan* in Task Information Form (TIF) Report #003 (Report #3) reflecting the Commission's directives set out in Order 2000-1187. In its report, the RPC advised the Commission that some parties had raised concerns that the timeframes established by the Commission for the duration of the permissive announcement period might be too long. The RPC noted that although the RIP reflected the Commission's directives, it was filed with the understanding that parties who had concerns regarding the length of the permissive period could raise them with the Commission.
3. On 14 May 2001, the Commission received an application from Aliant Telecom Inc., Bell Canada, MTS Communications Inc., Saskatchewan Telecommunications and TELUS Communications Inc. requesting that the Commission review and vary Order 2000-1187. The applicants requested that the Commission:
 - suspend the relief date of 7 June 2003, pending the results of the mid-year 2001 Central Office Code Utilization Surveys (COCUS);
 - alter the frequency of the COCUS from quarterly to semi-annually, until relief is implemented;
 - shorten the permissive dialing announcement period from four months to two months; and
 - allow the permissive dialing announcement to be phased in over a period of seven days.
4. In *NPA 514 relief date and other matters*, Decision CRTC 2001-648, 15 October 2001 (Decision 2001-648), the Commission disposed of the application to review and vary Order 2000-1187. The Commission deferred the relief date for area code 514 from 7 June 2003 to 7 February 2004. The Commission determined that it would be appropriate to collect COCUS information on a semi-annual basis until the first quarter of 2003 and to return to a quarterly basis thereafter. The Commission denied the applicants' request to shorten the permissive dialing announcement period to two months, noting that the announcement was a necessary component of a much larger and critical consumer awareness program. The Commission approved a seven day phasing-in period commencing 18 October 2003 and a seven day phasing-out period for the permissive dialing announcement ending 14 February 2004. At the end of the phasing-out period, the permissive dialing announcement would be replaced by the mandatory 10-digit local dialing announcement.
5. On 19 December 2001, the RPC submitted *Revised NPA 514 Relief Implementation Plan* in TIF Report #004 (Report #4), which reflected the Commission's determinations in Decision 2001-648.
6. In *CRTC Interconnection Steering Committee – Consensus Items*, Telecom Decision CRTC 2002-15, 13 March 2002 (Decision 2002-15), the Commission approved the revised RIP, which included, among other things, the updated implementation schedule and the specific texts to be used by all telecommunications service providers (TSPs) in recorded announcements during the permissive and mandatory 10-digit local dialing periods.

7. On 22 November 2002, the RPC submitted *Recommendation to Delay NPA 514 Relief Date from February 2004 to September 2005* in TIF Report #005 (Report #5). The RPC indicated that as a result of a downturn in the telecommunications industry, the forecasts showed that area code 514 was not projected to exhaust until September 2006. Accordingly, the RPC sought another deferral of relief until 12 months prior to the exhaust date.
8. In *Deferral of area code 514 relief date*, Telecom Decision CRTC 2003-6, 14 February 2003 (Decision 2003-6), the Commission approved the deferral of the area code 514 relief date to 24 September 2005. The Commission directed the RPC to revise the RIP to reflect the change of relief date.
9. On 14 May 2003, the RPC submitted *Revised NPA 514 Relief Implementation Plan* in TIF Report #006 (Report #6), in response to the Commission's directives. In addition to incorporating the changes directed by the Commission, the RPC included a substantive change to the texts to be used by TSPs in recorded announcements during the permissive and mandatory 10-digit local dialing periods. Although the Commission had already approved standard texts in Decision 2002-15, the RPC suggested permitting TSPs to use one of many announcements approved for previous area code relief projects or to modify the previously used announcements to suit their individual needs.
10. On 21 November 2003, the RPC submitted *Revised NPA 514 Relief Implementation Plan* in TIF Report #007 (Report #7). The RPC recommended another deferral of the area code 514 relief date from 24 September 2005 to 28 October 2006, noting that a more recent forecast indicated a deferral of the exhaust date to February 2008. The RPC also sought approval to have the Canadian Numbering Administrator (CNA) collect forecast data on a semi-annual basis in February and August of each year until relief is provided.
11. In a letter dated 2 December 2003 to the Chair of the RPC, the CISC Canadian Steering Committee on Numbering (CSCN) outlined concerns about a potential dial plan conflict related to the area code 514 relief plan. Specifically, the CSCN was concerned with opening area code 438, the assigned relief area code, as an overlay in the area code 514 region.
12. The CSCN noted that area code 438 was assigned as a central office (CO) code in area code 450, which was adjacent to area code 514. The CSCN noted that there were 10 exchanges in area code 450 that had seven-digit local dialing to CO area code 438, and that would also have 10-digit local dialing into the new area code 438. The CSCN noted that some networks may have difficulty differentiating between seven-digit dialed calls that should be routed immediately within area code 450 (i.e., 438-XXXX), and the first seven digits of a 10-digit local call into the new area code (i.e., 438-NXX-XXXX). The CSCN requested that the Chair advise the RPC of this situation.
13. On 23 January 2004, the RPC discussed the situation and identified five options for addressing the dial plan conflict that would occur if the area code 438 overlay was introduced. These options were:
 - dialing time delay;

- 10-digit local dialing from the 10 affected exchange areas to 450-438-XXXX telephone numbers;
 - 10-digit local dialing for all local calls originating in the 10 affected exchange areas;
 - 10-digit local dialing throughout area code 450; and
 - replace area code 438 with another area code.
14. On 15 April 2004, the RPC submitted to the CSCN and the Commission *NPA 514 RPC recommendation re: CO Code 450-438 Local Dial Plan Conflict* in TIF Report #008 (Report #8). The RPC recommended that 10-digit local dialing be introduced throughout area code 450 coincident with the introduction of 10-digit local dialing in area code 514. The RPC noted that should the Commission approve the relief solutions being proposed for other area codes, a uniform 10-digit local dialing plan would be created from Windsor, Ontario, through Toronto and Ottawa, to beyond Montréal in the fourth quarter of 2006 (i.e., area codes 519, 905, 289, 416, 647, 613, 819, 450, 514, and 438). In Ontario and Quebec, only area codes 807, 705, and 418 would have seven-digit local dialing within their area codes.
15. In Report #8, the RPC also presented its rationale for rejecting the other possible solutions to the dial plan conflict. The RPC indicated that dialing time delay would present a risk of "wrong number dialing" and associated costs. In addition, the RPC expressed its view that any mix of seven and 10-digit local dialing would introduce a complex local dial plan for customers in the 10 affected exchanges. With regard to the option of replacing area code 438 with another area code, the RPC's view was that this option would create an island of seven-digit local dialing in area code 450 that would be surrounded by 10-digit local dialing area codes. Bell Canada submitted to the RPC that, of the five options, replacing the assigned area code would be the highest cost solution.

Commission's analysis and determination

16. In this decision, the Commission must address three recommendations put forth by the RPC. In Report #6, the RPC recommended a substantive change to the announcement texts to be used by TSPs during the permissive and mandatory 10-digit local dialing periods. In Report #7, the RPC recommended deferring the relief date for area code 514 from 24 September 2005 to 28 October 2006. In Report #8, the RPC recommended that 10-digit local dialing be introduced throughout area code 450 coincident with area code 514 relief (i.e., the introduction of 10-digit local dialing in area code 514 and the opening of area code 438).

Text to be used in relief announcements

17. The Commission notes that in Report #6, the RPC proposed that TSPs operating in area code 514 be permitted to use any announcement text previously approved by the Commission for the permissive and mandatory 10-digit local dialing periods in other area code relief projects, or modify any of these texts to suit their individual needs, as long as the revised text was consistent with, but not necessarily identical to, a previously approved text.

18. The Commission notes that it has repeatedly stated that all TSPs are to introduce a clear, consistent, standard network announcement to avoid customer confusion and to ensure a competitively neutral environment¹.
19. Given that the Commission has already approved standard announcement texts to be used by TSPs for the permissive and mandatory 10-digit local dialing periods for area code 514 relief, the Commission **denies** the RPC's proposal. The Commission directs the RPC to file, by 1 November 2004, a revised RIP, which must include the standard announcement texts approved by the Commission in Decision 2002-15.

Deferral of area code 514 relief date

20. The Commission notes that at the time that Report #7 was filed, the exhaust date for area code 514 was projected to be February 2008. In *General NRUF Report to the Canadian Steering Committee on Numbering (CSCN)*, dated 1 June 2004, the CNA released the results of the most recent forecast cycle, which indicated an advancement of the area code 514 exhaust date from February 2008 to October 2007.
21. The Commission notes that the exhaust dates for various area codes in Canada were deferred during a downturn in the telecommunications industry, but that since 2003, CO code forecasts have shown some increased demand for telephone numbers.
22. The Commission is of the view that the relief date of 4 November 2006 submitted by the RPC is appropriate based on the information available at this time. The Commission therefore **approves** the deferral of the area code 514 relief date. The phasing-in period for the permissive 10-digit local dialing announcement shall commence 17 June 2006 and end 24 June 2006, and the phasing-in period for the mandatory 10-digit local dialing announcement shall commence 28 October 2006 and end 4 November 2006.
23. The Commission notes that it has already established that relief is to be provided at least 12 to 18 months prior to exhaust. In light of the latest advancement of the forecasted exhaust date, which has shortened the timeframe between exhaust and relief to the minimum 12-month period, the Commission is of the view that there is a need to confirm the most recently forecasted exhaust date.
24. To this end, the Commission directs any TSPs that use or intend to use CO codes from area code 514 to submit, to the CNA, by 26 November 2004, a special Numbering Resource Utilization Forecast (NRUF) that reflects all known and anticipated demand for each of the next 24 months.

¹ For example: *SAIC Canada – Request for approval of NPA 416 relief plan*, Telecom Order CRTC 99-1141, 10 December 1999; *New area code overlay to be introduced in 905 region*, Order CRTC 2000-772, 15 August 2000; *New area code overlay to be introduced in 514 region*, Order CRTC 2000-1187, 22 December 2000; *CRTC issues relief plans for area codes 613 and 819*, Order CRTC 2001-841, 28 November 2001; *Area code 519 relief plan*, Telecom Decision CRTC 2002-25, 22 April 2002; *Approval of revised Canadian NPA Relief Planning Guidelines*, Decision CRTC 2001-607, 26 September 2001; *Revision requested to Canadian numbering plan area relief planning guidelines*, Telecom Decision CRTC 2002-18, 10 April 2002; and *Deferral of area code 514 relief date*, Telecom Decision CRTC 2003-6, 14 February 2003.

The Commission directs the CNA to solicit the input for this special NRUF by 1 November 2004 and to file the results with the Commission by 10 January 2005. The Commission cautions TSPs operating in area code 514 to be well-positioned to react to any further advancement of the relief date, should an advancement of the relief date be appropriate.

Expansion of 10-digit local dialing to area code 450

25. In Report #8, the RPC recommended that 10-digit local dialing be introduced throughout area code 450, coincident with the introduction of 10-digit local dialing in area code 514 and the introduction of area code 438.
26. The Commission notes that some 10-digit local dialing into area code 514 from area code 450 already exists; however the 438 situation is unique, in that the same digits would be used as both an area code and a CO code. The Commission considers that if 10-digit local dialing is not introduced throughout area code 450 on all calls, there will be a dial plan conflict in 10 exchanges within that area code. This conflict would introduce a problem in local networks, which may have difficulty differentiating between seven-digit dialed calls that should be routed within area code 450 (i.e., 438-XXXX), and the first seven digits of a 10-digit local call into the new area code (i.e., 438-NXX-XXXX). In addition, absent an aggressive consumer awareness program, to clearly explain to customers that calls to the new area code 438 must be dialed on a 10-digit basis (i.e., with the area code), while calls to CO code 438 within area code 450 must be dialed on a seven-digit basis, customers in these exchanges could become confused and frustrated with the combination of local dialing plans.
27. The Commission notes that the RPC's recommendation to introduce 10-digit dialing throughout area code 450 would eliminate the confusion of combining seven-digit and 10-digit local dialing. The Commission further considers that approving the recommendation at this time, (i.e., without further process) would give TSPs and customers additional time to prepare for the change.
28. The Commission notes, however, that the RPC's recommendation was developed solely by the TSPs, and that approving the recommendation at this time would preclude consideration of public input. Furthermore, the Commission notes that this approach does not provide the affected customers, including those living in one area code and working in another, the opportunity to express their preferences with regard to the benefits and drawbacks of a common 10-digit local dialing plan. The Commission considers that customers must have the opportunity to consider the RPC's proposal and provide their views on the matter.
29. The Commission could provide an opportunity for the affected customers and TSPs to comment on the expansion of 10-digit local dialing throughout area code 450 by initiating a public process, specifically for that area code. The Commission recognizes that such a proceeding would need to be initiated and completed in a timely manner, given the current relief date for area code 514. The Commission considers it important to give adequate notice to customers, such that they can prepare for the change by becoming familiar with the dialing plan, as well as modifying their advertising, letterhead, PBX dial plans, etc. The Commission acknowledges that this approach may cause uncertainty for TSPs preparing their networks for area code 514 relief.

30. Alternatively, the Commission could address the issue of 10-digit local dialing in area code 450 within the context of a broader proceeding related to 10-digit local dialing in Canada. The Commission notes that 10-digit local dialing will be introduced in area codes 613 and 819 in October 2006, and that the RPC for area code 519 relief has also recommended the implementation of 10-digit local dialing. The Commission notes that customers in area code 705, which has local calling to certain exchanges in area codes 289, 905, 613, and 819, have been impacted by the introduction of 10-digit local dialing in area codes 289 and 905, and will be further impacted when 10-digit local dialing is introduced in area codes 613 and 819 in October 2006. The Commission further notes that area code 250 in British Columbia (B.C.) and area code 403 in Alberta are currently in the seven-year relief planning window, and that area codes 780 in Alberta, 778 in B.C., and 416 and 647 in Ontario are projected to exhaust within the decade. As the majority of the Canadian population will be required to dial some or all local calls on a 10-digit basis within five to six years, the Commission is of the view that it may be timely to seek comment on the issue of introducing 10-digit local dialing on a broader basis, such as a regional or provincial basis.
31. Given the number of area codes expected to exhaust in the next decade, the Commission considers that there may be continued uncertainty regarding when or if 10-digit local dialing will be introduced in individual Canadian area codes. The Commission considers it appropriate to solicit views from the public on the evolution towards 10-digit local dialing in Canada, specifically on how and when this evolution should occur. The Commission considers that initiating a public proceeding would assist the Commission in developing a strategy to facilitate the transition from a seven-digit local dialing environment to a 10-digit local dialing environment, while serving the best interest of Canadians.
32. The Commission notes that the development of a long-term policy, regarding the timing and the manner of the evolution towards 10-digit dialing, would reduce the effort required by the CNA, the industry and future RPCs in examining solutions to area code exhaust.
33. Furthermore, the Commission is of the view that in examining this issue now, Canada would be better positioned to handle North American Numbering Plan (NANP) expansion in the future. The Commission notes that exhaust of the NANP appears to have been deferred for a number of years; however, when it does occur, as indicated in the *CSCN NANP Expansion Report to CRTC* dated 9 February 2000, the first requirement will be that all nations in the NANP must establish a uniform 10-digit dial plan.
34. The Commission notes that if 10-digit local dialing was introduced simultaneously in area codes 450 and 514, the TSPs could coordinate the development and distribution of their consumer awareness programs. The Commission recognizes that, if the introduction of 10-digit local dialing in area code 450 is deferred pending a public process, the TSPs may have certain concerns regarding a lack of efficiency, related to the development and distribution of the consumer awareness programs. The Commission, however, is of the view that these concerns could be mitigated and additional benefits could be realized if, within the context of the broad proceeding, public input from customers in area code 450 was sought in an expedited manner.

35. In light of the above, the Commission initiates a proceeding to seek public comment on the issue of mandatory 10-digit local dialing in Canada, with an objective of rendering a determination on 10-digit local dialing in area code 450 in a timely manner. The Commission will release a public notice in the near future announcing the details of this proceeding. The Commission encourages customers in area code 450 to consider the issues raised in this decision and to participate in the upcoming public proceeding.

Secretary General

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