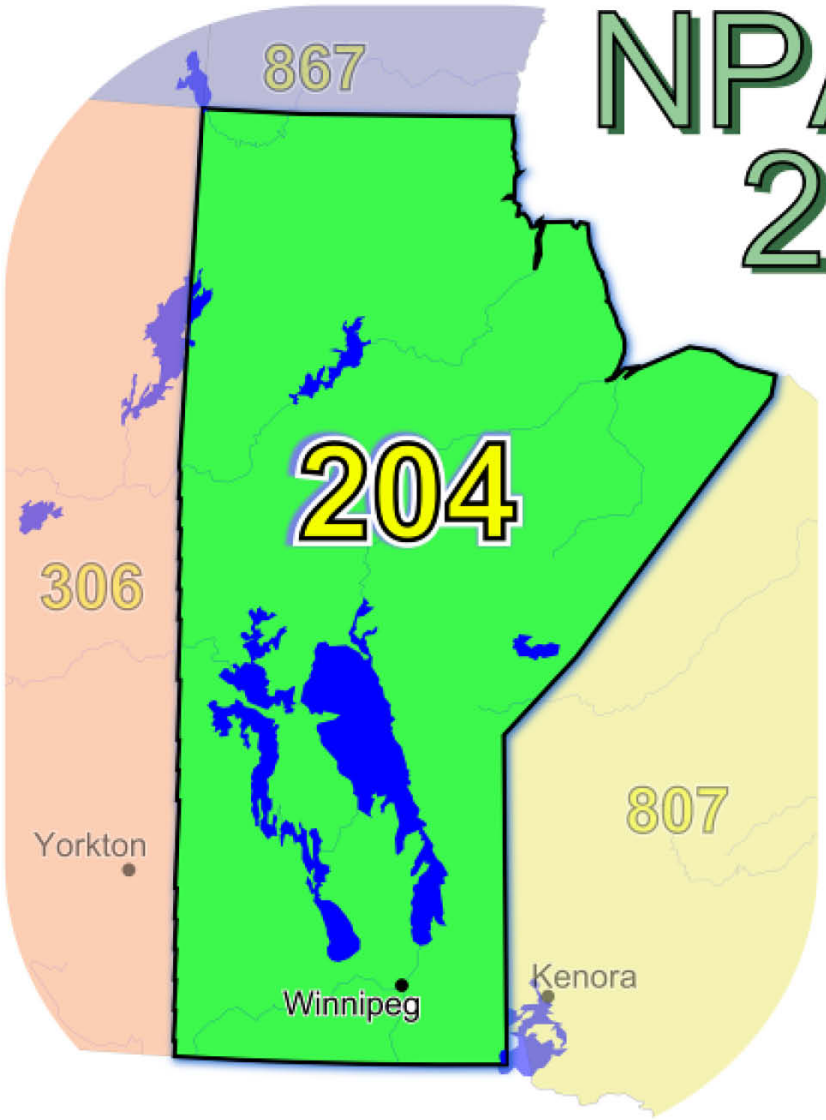
Canadian Numbering Administrator



NPA 204 Relief Planning

BELL CANADA CONTRIBUTION

Planning Document (PD)

Version 1.0 – 16 July 2009

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TABLE OF CONTENTS

CONTENTS OF ANNEXES

NPA 204 Planning Document (PD)

1. INTRODUCTION

The 204 area code consists of 244 Exchange Areas serving the province of Manitoba which includes the major communities of Brandon, Dauphin, Portage La Prairie, Selkirk, Steinbach Thompson, Winkler and Winnipeg. Most of the growth for existing service providers in area code 204 is concentrated in less than 10 Exchange Areas, with the majority of this growth being in the Exchange Areas of Brandon, Dauphin, Portage La Prairie, Selkirk, Steinbach and Winnipeg. However the growth due to new service providers introducing initial service in new areas is spread over a larger number of Exchange Areas throughout area code 204, with proportionally greater growth occurring outside the major communities. The total combined growth is therefore not concentrated in or limited to the Exchange Areas serving the major communities. See Annex B Table 1 for a list of Exchange Areas in NPA 204.

In December 2008 the Canadian Numbering Administrator (CNA) initiated its January 2009 General Numbering Resource Utilization Forecast (G-NRUF). The draft aggregate results of this G-NRUF, compiled on 23 March 2009, indicated that the Projected Exhaust Date (PED) for NPA 204 had moved in from December 2021 to October 2010. Because the PED was less than 72 months in the future, it was necessary to start relief planning, and the CNA notified the CRTC of the situation and asked the CRTC to issue a Telecom Notice of Consultation for the establishment of a CISC ad hoc committee for area code relief planning in area code 204 for Manitoba. On 23 March 2009, the Canadian Numbering Administrator (CNA) declared that Number Plan Area (NPA) 204 was in a Jeopardy Condition. Revised forecasts subsequently received from some LECs indicated that Projected Exhaust Date (PED) had moved from October 2010 to February 2011. In order to gather detailed forecast data for Relief Planning purposes, the CNA initiated a Jeopardy Numbering Resource Utilization Forecast (J-NRUF) on 29 March 2009. The results of that J-NRUF, released on 14 May 2009, indicated NPA 204 would exhaust in January 2011.

The introduction of Local Interconnection Regions (LIRs) the implementation of Wireless Number Portability (WNP), and initial CO Codes for new CLECs and WSPs have accelerated demand for Central Office (CO) Codes throughout area code 204.

On 28 May 2009, the CRTC issued Telecom Notice of Consultation CRTC 2009-309, *Establishment of a CISC ad hoc committee for area code relief planning for area code 204 in Manitoba*, in which it established a CRTC Interconnection Steering Committee ad hoc relief planning committee (RPC) to examine options for providing relief to area code 204 in Manitoba. The Notice of Consultation also directed the introduction of CO code rationing measures that will be in place until 66 days before the code relief is implemented. These measures are described in detail at the beginning of section 11 of this Planning Document (PD), The Commission believes that the measures will extend the projected exhaust to at least 1 January 2013.

On 5 June 2009, the CNA issued an Initial Planning Document (IPD) that identified alternatives for providing relief in the NPA 204 geographic area. The NPA 204 Relief Planning Committee (RPC) developed this Planning Document (PD) based on the IPD. This PD was developed by the RPC in accordance with the CRTC-approved Canadian NPA Relief Planning Guideline (the Guideline) dated 2 June 2009. A copy of the Guideline is available from the CRTC CISC

guidelines web page at *http://www.crtc.gc.ca/cisc/eng/cisf3fg.htm* or via a link from the CNA website at *http://www.cnac.ca/*.

The objective of the NPA Relief Planning process is to ensure that CO Codes and telephone numbers are always available for use by Telecommunications Service Providers (TSPs) and their customers in the geographic area requiring relief.

Various Relief Options are identified in this PD for consideration as potential methods to ensure that an adequate quantity of telephone numbers is available for assignment in the geographic area covered by area code 204.

Given the magnitude of this undertaking, inter-company commitment and co-operation are essential throughout the planning, provisioning and implementation stages of the introduction of a new NPA.

It is very important to closely monitor the CO Code requirements of all existing and prospective CO Code Holders so that relief can be timed to ensure that CO Codes and telephone numbers are always available for service providers and customers, and to avoid a Jeopardy Condition.

2. NPA RELIEF PLANNING PROCESS

The roles of the participants (e.g., CRTC, CNA, CRTC Interconnection Steering Committee (CISC), RPC participants, Interested Parties) for NPA Relief Planning are identified in section 6.0 of the CRTC-approved Canadian NPA Relief Planning Guideline (the Guideline), dated 2 June 2009. A copy of the Guideline is available from the CRTC CISC guidelines web page at *http://www.crtc.gc.ca/cisc/eng/cisf3fg.htm* or via a link from the CNA website at *http://www.cnac.ca/*.

To increase public awareness and participation in the NPA Relief Planning process, the CRTC has determined that NPA RPCs will be established as ad hoc committees of the CISC. Generally, a separate ad hoc committee is created to deal with relief in each area code. The CNA, in its function as NPA Relief Planning Coordinator, acts as chair of these ad hoc committees. Meetings and conference calls of the ad hoc NPA RPCs are all open to public participation and are conducted in accordance with the CISC Administrative Guidelines.

Section 6.1.6 of the Canadian NPA Relief Planning Guideline requires the CNA to attempt to identify organizations including, but not limited to, municipalities to notify them of the initial meeting of the RPC as well as the IPD in order to allow such organizations the opportunity to register and participate in the activities of the RPC.

A copy of the CISC Administrative Guidelines can be obtained from the CRTC website at *http://www.crtc.gc.ca/public/cisc/c-docs/CISC2001-03-31.doc*

NPA Relief Planning is conducted under the regulatory oversight of the CRTC. Notwithstanding the process detailed in the Guideline, the CRTC may exercise its authority under the *Telecommunications Act* to alter this process at any time. The CRTC has the authority, under the *Telecommunications Act*, to review, modify and give final approval to the PD and the Relief Implementation Plan (RIP) developed and submitted by the RPC to the CRTC via the CISC process.

Any person wishing to participate in the NPA Relief Planning process can contact the CNA and request to be added to NPA-specific distribution lists. In addition, individuals can also register with the CRTC as interested parties to any proceedings that result from the NPA Relief Planning process. More information on how to participate in CRTC public processes is available at: *http://www.crtc.gc.ca/eng/info_sht/g4.htm*.

Annex C contains a brief summary of Canadian geographic area code relief history.

3. NPA RELIEF METHODS

The three basic NPA Relief Methods (i.e., split, overlay and boundary realignment) are described in detail in section 5 of the Canadian NPA Relief Planning Guideline. The purpose of this section is to identify and briefly describe those methods. For additional details refer to the Guideline.

The term Numbering Plan Area (NPA) refers to a discrete geographic area, within the area served by the North American Numbering Plan (NANP), to which one or more NPA Codes (also known as area codes) may be assigned (e.g., the province of Manitoba is a Numbering Plan Area (NPA) to which NPA Code 204 is assigned).

Split

Under the Split Method, the geographic area served by an existing NPA is generally divided or "split" into two unique geographic areas (i.e., new NPA). One of the areas retains the existing NPA Code, and the other area changes to a new NPA Code.

Overlay

Under the Overlay method, a relief NPA Code is generally superimposed or "overlaid" on top of part or all of an existing NPA. With overlays, changes to existing customers' telephone numbers are not required. Four types of overlays are described in the Guideline as follows. Under the Distributed Overlay method, a new relief NPA Code is "overlaid" on top of all of an exhausting NPA. Under a Concentrated Overlay method, a new relief NPA Code is "overlaid" on top of part of an exhausting NPA (e.g., over a fast growing metropolitan area within an existing NPA). Under a Boundary Extension Overlay method, the boundary of an existing NPA that has spare capacity is extended to overlay part or all of an exhausting NPA. Under a Technology-Specific Overlay, a new NPA Code would be assigned to overlay an exhausting NPA and the numbering resources in the new NPA Code would be used only for a specific type of technology (e.g., wireline telephones, wireless telephones, facsimile).

Boundary Realignment

Under the Boundary Realignment method, the boundary between the NPA that requires relief and an adjacent NPA are modified such that some of the customers in the exhausting NPA have their telephone numbers changed by being given telephone numbers in the adjacent NPA.

The following text may be deleted if the above summary is viewed as sufficient by the RPC or retained if additional details are desired in this PD.

3.1 Geographic Split

3.1.1 Definition

Under the Split Method, the geographic area served by an existing NPA is divided or "split" into two or more unique geographic areas (i.e., new NPAs). One of the areas retains the existing NPA Code, and the other area or each of the other areas changes to a new unique NPA. The projected lives of all the areas following the split should be similar. The area with the largest

quantity of customers usually retains the existing NPA Code in order to minimize the quantity of number changes.

In order to facilitate the transition to the new area code, a permissive dialling arrangement is established. During a Permissive Dialling Period, calls to customers in the new area code will be completed whether the caller dials the old or new area code. For example, on a long distance call, to a 10-digit telephone number in the new NPA(s), the caller may dial either the existing or the new NPA Code and the 7-digit number during the Permissive Dialling Period. During the Permissive Dialling Period, all TSPs in the exhausting NPA will place standard network announcements on calls dialled using the old area code to customers in the new area code in order to advise customers of the new area code and automatically complete the calls.

Once an initial relief has been provided using an overlay method and 10-digit local dialling has been introduced, subsequent reliefs will generally not be provided using a split method, as splits would be impractical, disruptive, and not provide significant benefits. A split would be impractical and disruptive because it would require many number changes including CO Code changes as well as NPA Code changes. A split could allow reintroduction of permissive 7-digit local dialling however this would provide little or no benefit and would cause customers, Carriers and TSPs to incur additional costs after already having incurred costs to change to mandatory 10-digit local dialling. It would also be inconsistent with the industry migration towards the Uniform Dialling Plan (i.e., 10-digit local and toll dialling).

3.1.2 General Attributes

- A frequently implemented method of NPA relief in the past; last implemented in Canada in 1999.
- 7-digit dialling is usually retained for local calls within area codes.
- If CO Code protection is not in place after relief is implemented, 10-digit dialling is required for local calls between different area codes.
- Number changes are required within new area code boundaries (NPA Code changes).
- The time required to transition to a new area code with a split is usually longer than the time needed to transition to mandatory 10-digit dialling for a first-time overlay.
- Is generally not a practical method for relief for an area that has previously been relieved by an overlay or already has mandatory 10-digit local dialling, since it is costlier and more time consuming than an additional overlay would be, and does not provide the benefit of retaining 7-digit dialling.
- Reprogramming or replacement of equipment (switches, Primary Branch Exchange (PBXs), cellular phones, etc.).
- Many existing customers are affected by telephone number changes.
- More economic burden may generally be caused by customer number changes (businesses, public costs, stationery, etc.) than an overlay.
- May not be as expensive to display numbers in telephone directories.
- Requires a permissive dialling period for customers' numbers in the new area code.
- Possible dispute over which portion of the area retains the existing NPA Code.
- Potential for associating NPA Codes with smaller geographic areas within the exhausting NPA (e.g., branding and ease of use opportunities).

3.2 Overlay

3.2.1 Definition

Under the overlay method, a relief NPA Code is superimposed or “overlaid” on top of part or all of an existing NPA or NPAs. With overlays, changes to existing telephone numbers are not required.

Once an initial overlay has been introduced, subsequent reliefs will generally be provided using additional overlays, as splits would be impractical, disruptive, and not provide significant benefits. A split would be impractical and disruptive because it would require many number changes including CO Code changes as well as NPA Code changes. A split could allow reintroduction of permissive 7-digit local dialling however this would provide little or no benefit and would cause customers, Carriers and TSPs to incur additional costs after already having incurred costs to change to mandatory 10-digit local dialling. It would also be inconsistent with the industry migration towards the Uniform Dialling Plan (i.e., 10-digit local and toll dialling).

When an overlay relief NPA Code is activated, mandatory 10-digit dialling must be in place for all local calls originating within the area being relieved, which means that local calls dialled with 7 digits will not be completed. When mandatory 10-digit local dialling is in place it will apply equally to calls originating from numbers in the existing NPA Code(s) and from numbers in any new overlay NPA Code(s). This is a CRTC policy that provides competitive equity for the communications industry since all customers in the area will have to dial the same number of digits regardless of the NPA Code in which the calling or called parties’ numbers are assigned.

Generally, any 7-digit local dialling from adjacent NPAs into the existing NPA must also be converted to 10-digit dialling at the time of relief; however, exceptions to this policy may be considered if there is a need to simplify the dialling plan in the neighbouring NPA (i.e., to retain 7-digit local dialling across an area code boundary). Where 7-digit local dialling across an area code boundary is retained, CO Code protection would be required to avoid 7-digit dialling conflicts.

Four types of overlays are described in the Guideline as follows:

Distributed Overlay

The Distributed Overlay strategy may be considered in many situations including providing relief for a single existing NPA served by a single NPA Code or multiple existing overlay NPA Codes, or for multiple existing NPAs (i.e., different geographic areas) served by multiple NPA Codes. In general, when providing relief for a single NPA served by a single NPA Code or multiple existing overlay NPA Codes, the new area code is "overlaid" on top of the NPA requiring relief and covers exactly the same geographic boundaries. The Distributed Overlay method has been the most used method in Canada in recent years.

Concentrated Overlay

A Concentrated Overlay strategy may be considered in situations where the majority of the demand for new telephone numbers is expected to be concentrated in one section of an existing area code. For example, a fast growing metropolitan area and a sparsely populated rural area could be covered by the same area code. The new area code would be assigned to the section of the original area code experiencing the greatest growth (e.g., the metropolitan area), and any

need for new CO Codes in that section would be met by the assignment of CO Codes from the new area code. In the area not covered by the new area code, any future need for new CO Codes would be met by the assignment of CO Codes from the original area code. Relief using a concentrated overlay must be implemented sooner than relief using other overlay methods or a split in order to ensure that sufficient CO Codes are available for assignment from the original area code to that section not covered by the new concentrated overlay. This requirement may create a situation where there is insufficient time to implement a concentrated overlay, or, in some cases, CO Code assignment monitoring and CO Code conservation measures may have to be implemented prior to the introduction of the new concentrated overlay NPA in order to ensure that sufficient CO Codes will be available for growth in the area outside the concentrated overlay.

When subsequent relief is required in the original NPA due to growth in the sections outside the concentrated overlay, this could be provided by expanding the geographic coverage area of the concentrated overlay NPA Code with a boundary extension overlay, or by a new concentrated overlay of the exhausting sections, or by another relief method.
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Boundary Extension Overlay

Under a boundary extension overlay method, the boundary of one NPA that has spare capacity is extended to overlay part or all of the coverage area of the exhausting NPA or NPAs. Unassigned CO Codes from the NPA Code(s) whose boundary is extended can be assigned within the overlay area of the exhausting NPA(s) as well as within the original coverage area. An appropriate use of boundary extension might be in a province consisting of two or more NPAs, where one NPA is exhausting and another has spare capacity (e.g., the NPA served by NPA Code 778, originally a concentrated overlay of part of the NPA served by NPA Code 604, was extended to cover all of the exhausting NPA served by NPA Code 250 as well as the rest of the NPA served by NPA Code 604, thereby creating a province-wide NPA over British Columbia).

This solution has the advantage of not requiring a new NPA Code. The lives of the NPA whose boundary is being extended and the NPA being relieved will be shorter than if a new NPA Code is introduced, however it uses NPA Code capacity more efficiently (e.g. may provide an opportunity to use spare capacity from an NPA Code that would otherwise not exhaust until the distant future), and it reduces the number of relief planning areas. The boundary extension overlay would not normally be used to create an NPA that overlays more than one province.

Technology Specific Overlay

Under a technology-specific overlay, a new NPA Code would be assigned to overlay an existing NPA(s) serving a specific geographic area, and the numbering resources in the new NPA Code would be used only for a specific type of technology (e.g., wireline telephones, wireless telephones, facsimile). This type of overlay has been utilized in certain other nations for wireless telephones. With the introduction of wireless number portability (WNP) in Canada, telephone numbers can be moved between wireline and wireless services and therefore the use of an NPA Code exclusively by wireline or wireless technology is not possible. Consequently, a technology-specific overlay was not considered by the CNA.

3.2.2 General Attributes

- A frequently implemented method of NPA relief in recent years; the primary method used since 1999 for all relief projects in Canada (e.g., 416/647, 289/905, 514/438, 519/226, 604/778, 613/343).
- Requires mandatory 10-digit local dialling throughout the area codes being relieved, and generally from adjacent area codes into area codes being relieved, usually prior to relief or a previous overlay relief.
- No number changes are required for existing customers.
- Least disruptive to end-users (allows users to retain current telephone numbers).
- Generally creates less economic burden for existing business than a geographic split.
- In a single residence or business there may be numbers in two or more NPA Codes.
- Directory costs may increase to print 10-digit numbers.
- If mandatory 10-digit dialling does not exist in the area codes being relieved and a transition to mandatory 10-digit dialling is required, the transition can be implemented in a shorter time than the Permissive Dialling Period required with an area code split.
- Favoured by Carriers and TSPs due to cost considerations (e.g., no number changes in Operating Support Systems (OSSs), no need to reprogram wireless handsets).
- If the overlay is concentrated; it must be implemented sooner than if the overlay is distributed, and it increases the number of areas for which future relief must be planned separately.
- If the overlay is of multiple NPAs, it reduces the number of areas for which future relief must be separately planned.
- If the overlay is a boundary extension, a new NPA Code will not be needed at the time of relief, and the number of areas for which future relief must be separately planned may be reduced.
- Carriers must use 10-digit signalling for all local traffic they send to other Carriers, and must be able to receive 10-digit signalling on local traffic they receive from other Carriers

3.3 Boundary Realignment

3.3.1 Definition

In this type of NPA boundary realignment, the boundary between the NPA that requires relief and an adjacent NPA are modified such that some of the customers in the exhausting NPA have their telephone numbers changed by being given telephone numbers in the adjacent NPA. With a boundary realignment, CO Codes that are not utilized in an adjacent NPA are used to serve customers in part of the geographic area of the NPA requiring relief. As a result, the geographic coverage area of the exhausting NPA is reduced in size and the geographic area of the NPA with spare capacity is expanded. The customers in the geographic area affected by the boundary change are required to change their telephone numbers on a specific date. If any existing CO Codes in the area of the exhausting NPA moving to the adjacent NPA are the same as existing CO Codes in the adjacent NPA, then customers with those CO Codes in the area being relieved would have to take CO Code changes as well as NPA changes. This method is generally viewed as an interim measure because it tends to provide only short term relief relative to the long term relief provided when introducing a new NPA under the split and overlay methods.

3.3.2 General Attributes

- A method of NPA relief never used in Canada.
- Requires customer number changes in the affected geographic area (NPA and CO Code changes).
- Generally viewed as an interim measure because it tends to provide only short term relief.
- Causes inconvenience and creates an economic burden for those required to take number changes.

4. NPA EXHAUST INFORMATION

The following table summarizes the Projected Exhaust Dates (i.e. the dates when CO Codes in NPA 204 would be expected to exhaust) for NPA 204:

NRUF	Projected Exhaust Date
G-NRUF January 2008	December 2021
G-NRUF January 2009	September 2010
J-NRUF April 2009	January 2011
J-NRUF April 2009 with code rationing per CRTC TNC 2009-309 (28 May 2009)	March 2015

Refer to Annex A, Figures 3, 4, 5, 6, 7 and 8 for graphs of forecasted CO Code utilization in area code 204.

In CRTC Telecommunications Notice of Consultation (TNC) 2009-309 issued on 28 May 2009, the Commission identified that the CNA has declared a jeopardy condition for area code 204 and that area code 204 is projected to exhaust within only 19 months. The CRTC stated that it considers the PED of January 2011 does not provide sufficient time for carriers, other service providers, and some customers to implement area code relief activities such as network and customer equipment upgrades, the potential introduction of 10-digit dialling, and customer education and awareness programs. Accordingly, the CRTC considered it necessary to extend the projected exhaust to a date that provides enough time to examine relief options and for all parties to make the requisite changes to their systems and equipment.

The CRTC determined that the projected exhaust could be extended through the use of central office (CO) code rationing measures at least 1 January 2013. The CRTC directed that CO code rationing measures be in place until 66 days before the code relief is implemented. These CRTC measures will permit CO code holders in area code 204 to obtain the number of CO codes identified in their 30 April 2009 Jeopardy-Numbering Resource Utilization Forecasts (J-NRUFs) or in future J-NRUFs, the applicable J-NRUF to be determined in consultation with Commission staff, up to a maximum of 10 CO codes per year. New entrants who do not have any CO codes in area code 204 will be permitted, within the first year of entering the Manitoba market, to obtain up to 20 CO codes as identified in their J-NRUFs. Thereafter, these new entrants will be subject to the above-noted code rationing measures.

Given this situation, it is important for the industry to implement relief as soon as possible in order to address the CO Code shortage (i.e., preferably before the Projected Exhaust Date (PED) but as soon as practically possible). In the event that the situation changes, such that the projected demand for CO Codes is reduced thus delaying the Projected Exhaust Date (PED), the timeframe for implementing relief could be extended.

5. DESCRIPTION AND ASSESSMENT OF RELIEF OPTIONS

Relief Options are alternative approaches for providing relief to an exhausting NPA. Each Relief Option generally utilizes one or more of the 3 basic Relief Methods, specifically split, overlay or boundary realignment as described in the Canadian NPA Relief Planning Guideline (see Section 3 for a brief description of each method).Based on an assessment of the basic relief methods, the following Relief Options were identified and examined in detail:

- Geographic Split - 8 options (Plans 1a, 1b, 2a, 2b, 3a, 3b, 4a, and 4b)
- Distributed Overlay - 1 option (Plan 5)

Relief Options using a Concentrated Overlay were not examined in detail by the RPC since the overall growth is spread throughout the NPA, thus negating any significant value that might be gained from using such a relief method.

Relief options using a Boundary Extension Overlay and a Boundary Realignment were not examined by the RPC because such options would create area codes that cross provincial boundaries, which is not allowed by the Canadian NPA Relief Planning Guideline and would create geographic confusion for customers and technical difficulties for telecommunications service providers.

See Annex A, Figures 9 through 17 for diagrams of the Relief Options identified by the RPC.

5.1 Geographic Split

Eight different Relief Options were evaluated to introduce a new area code in the NPA 204 area using the Geographic Split method of providing CO Code relief. With each of these options, number changes are required in the area that does not retain NPA 204. Selecting a split option for NPA Relief will impact from 37% to 63% of the customers with a number change.

A major attribute of a split is usually that the 7-digit local dialling plan does not have to be changed in either portion of the split area code.

It is assumed that after the Split, local calls in NPA 204 and the new NPA will be dialled using 7-digits. Code Protection would be required due to existing local calling arrangements between NPA 204 and the new NPA.

All of the Split Options are based on Local Interconnection Regions. A Local Interconnection Region (LIR) is a geographic area specified by Incumbent Local Exchange Carriers (ILECs) within which traffic is exchanged with Competitive Local Exchange Carriers (CLECs) on a Bill and Keep basis as specified in Telecom Decisions CRTC 2004-46 and 2006-35 “Trunking arrangements for the interchange of traffic and the point of interconnection between local exchange carriers”. LIRs are unique groupings of ILEC Exchange Areas which provide for more efficient interconnection between Local Exchange Carriers (LECs).

Split Options 1a and 1b – Winnipeg LIR in one NPA, and remaining LIRs in other NPA

Plan 1a - Winnipeg LIR retains NPA 204, remaining LIRs change to new NPA:

36 Exchange Areas in Winnipeg LIR retain NPA 204, and 208 Exchange Areas in Brandon, Dauphin, Melita, Morris, Steinbach, Swan River, Selkirk & Thompson LIRs change to new NPA

Plan 1b - Winnipeg LIR changes to new NPA, remaining LIRs retain NPA 204:

36 Exchange Areas in Winnipeg LIR change to New NPA, and 208 Exchange Areas in Brandon, Dauphin, Melita, Morris, Steinbach, Swan River, Selkirk & Thompson LIRs retain NPA 204

With these options (Plans 1a and 1b), CO Codes assigned in existing NPA 204 would split as follows, with number changes required in one of the two areas:

Area	*Assigned CO Codes in NPA 204 (01-01-09)*	
	#/% of Total NPA 204 CO Codes	*Projected Exhaust Date*
36 Exchange Areas in Winnipeg LIR	252/43%	2082
208 Exchange Areas in Brandon, Dauphin, Melita, Morris, Steinbach, Swan River, Selkirk & Thompson LIRs	332/57%	2104

If 7-digit local dialling is maintained between NPA 204 and the new NPA, Code Protection would be required due to existing local calling arrangements between these regions as follows:

Exchange in the Winnipeg LIR with local calling to/from Exchange(s) in other LIR	**Exchange(s) in other LIR with local calling from/to an Exchange in the Winnipeg LIR**
Amaranth	Alonsa Glenella
Anola	Beausejour Ste. Anne Lorette
Austin	Glenboro
Crystal City	Pilot Mound Snowflake Cartwright Manitou
Dugald	Lorette
Elie	Marquette Warren
Gladstone	Arden Plumas
Hazelridge	Lorette Beausejour
Holland	Cypress River Glenboro
Langruth	Glenella Plumas

Miami	Carman Darlingford Manitou Morden
Oakbank	Lorette Beausejour Lockport Selkirk
Pilot Mound	Baldur Cartwright Manitou Snowflake
Poplar Point	Marquette St Laurent Woodlands
Roland	Carman Morden Morris Winkler
Sanford	Morris St Adolphe Ste Agathe
Sidney	Arden Carberry
Somerset	Manitou
Sperling	Carman Morris
St. Claude	Carman
St. Francois Xavier	Warren
Starbuck	Carman
Stephenfield	Carman
Stonewall	Marquette Stony Mountain Warren Woodlands Petersfield Selkirk Teulon
Swan Lake	Baldur Cypress River Manitou
Winnipeg	Lockport Lorette St Adolphe Stony Mountain

Split Options 2a and 2b – Melita, Morris, Steinbach and Winnipeg LIRs in one NPA and remaining LIRs in other NPA

Plan 2a - Melita, Morris, Steinbach & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA:

85 Exchange Areas in Melita, Morris, Steinbach & Winnipeg LIRs retain NPA 204, and 159 Exchange Areas in Brandon, Dauphin, Swan River, Selkirk & Thompson LIRs change to new NPA

Plan 2b - Melita, Morris, Steinbach & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204:

85 Exchange Areas in Melita, Morris, Steinbach & Winnipeg LIR change to new NPA, and 159 Exchange Areas in Brandon, Dauphin, Swan River, Selkirk and Thompson LIRs retain NPA 204

With these options (Plans 2a and 2b), CO Codes assigned in existing NPA 204 would split as follows, with number changes required in one of the two areas:

Area	*Assigned CO Codes in NPA 204 (01-01-09)*	
	#/% of Total NPA 204 CO Codes	*Projected Exhaust Date*
85 Exchange Areas in Melita, Morris, Steinbach & Winnipeg LIRs	332/57%	2070
159 Exchange Areas in Brandon, Dauphin, Swan River, Selkirk & Thompson LIRs	252/43%	2145

If 7-digit local dialling is maintained between NPA 204 and the new NPA, Code Protection would be required due to existing local calling arrangements between these regions as follows:

Exchange in Melita, Morris, Steinbach or Winnipeg LIR with local calling to/from Exchange(s) in Brandon, Dauphin, Swan River, Selkirk &/or Thompson LIR	**Exchange(s) in Brandon, Dauphin Swan River, Selkirk &/or Thompson LIR with local calling from/to an Exchange in Melita, Morris, Steinbach or Winnipeg LIR**
Amaranth	Alonsa
Anola	Beausejour
Austin	Glenboro
Crystal City	Cartwright
Deloraine	Boissevain Elgin Hartney
Eriksdale	Ashern Fisher Branch Poplarfield
Falcon Lake	Rennie Whitemouth
Gladstone	Arden

Hadashville	Rennie Whitemouth
Hazelridge	Beausejour
Holland	Cypress River Glenboro
Inwood	Fraserwood Poplarfield
Lundar	Poplarfield
Medora-Napinka	Hartney
Melita	Hartney Pipestone Reston
Oakbank	Beausejour Lockport Selkirk
Pilot Mound	Baldur Cartwright
Sidney	Arden Carberry
Stonewall	Petersfield Selkirk Teulon
Stony Mountain	Lockport Selkirk
Swan Lake	Baldur Cypress River
Teulon	Fraserwood Gimli Petersfield Winnipeg Beach
Tilston	Reston
Winnipeg	Lockport

Split Options 3a and 3b – Selkirk, Thompson & Winnipeg LIRs in one NPA, and remaining LIRs in other NPA

Plan 3a - Selkirk, Thompson & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA:

111 Exchange Areas in Selkirk, Thompson & Winnipeg LIRs retain NPA 204, and 133 Exchange Areas in Brandon, Dauphin, Melita, Morris, Swan River, & Steinbach LIRs change to new NPA

Plan 3b - Selkirk, Thompson & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204:

111 Exchange Areas in Selkirk, Thompson & Winnipeg LIRs change to new NPA, and
133 Exchange Areas in Brandon, Dauphin, Melita, Morris, Swan River & Steinbach LIRs retain NPA 204

With these options (Plans 3a and 3b), CO Codes assigned in existing NPA 204 would split as follows, with number changes required in one of the two areas:

Area	*Assigned CO Codes in NPA 204 (01-01-09)*	
	#/% of Total NPA 204 CO Codes	*Projected Exhaust Date*
111 Exchange Areas in Selkirk, Thompson and Winnipeg LIRs	63%	2056
133 Exchange Areas in Brandon, Dauphin, Melita, Morris, Swan River, and Steinbach LIRs	37%	2229

With these two options (Plans 3a and 3b), number changes would be required in either region as defined above.

If 7-digit local dialling is maintained between NPA 204 and the new NPA, Code Protection would be required due to existing local calling arrangements between these regions as follows:

Exchange in Selkirk, Thompson or Winnipeg LIR with local calling to/from Exchanges in Brandon, Dauphin, Melita, Morris, Steinbach &/or Swan River LIR	**Exchange(s) in Brandon, Dauphin, Melita, Morris, Steinbach &/or Swan River LIR with local calling from/to an Exchange in Selkirk, Thompson or Winnipeg LIR**
Amaranth	Alonsa
Anola	Lorette Ste Anne
Ashern	Eddystone Eriksdale
Austin	Glenboro
Crystal City	Snowflake Cartwright Manitou
Elie	Marquette Warren
Fisher Branch	Eriksdale
Fraserwood	Inwood Teulon
Gimli	Teulon
Gladstone	Arden
Hazelridge	Lorette
Holland	Glenboro
Gladstone	Glenella
Lockport	Stony Mountain

Miami	Carman Darlingford Manitou Morden
Oakbank	Lorette
Petersfield	Teulon
Pilot Mound	Baldur Cartwright Manitou Snowflake
Poplar Point	Marquette Woodlands
Poplarfield	Eriksdale Inwood Lundar
Rennie	Hadashville
Roland	Carman Morden Morris Plum Coulee Winkler
Sanford	Morris St Adolphe Ste Agathe
Selkirk	Stony Mountain
Sidney	Arden Carberry
Somerset	Manitou
Sperling	Carman Morris
St. Claude	Carman
St. Francois Xavier	Stonewall Warren
Starbuck	Carman
Stephenfield	Carman
Stonewall	Marquette Stony Mountain Warren Woodlands
Swan Lake	Baldur Cypress River Manitou
Whitemouth	Falcon Lake Hadashville
Winnipeg	Lorette St Adolphe Stony Mountain
Winnipeg Beach	Teulon

Split Options 4a and 4b – Brandon, Melita and Winnipeg LIRs in one NPA, and remaining LIRs in other NPA

Plan 4a - Brandon, Melita & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA:
104 Exchange Areas in Brandon, Melita and Winnipeg LIRs retain NPA 204, and 140 Exchange Areas in Dauphin, Morris, Selkirk, Swan River, Steinbach, and Thompson LIRs change to new NPA

Plan 4b - Brandon, Melita & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204:
104 Exchange Areas in Brandon, Melita and Winnipeg LIRs change to new NPA, and 140 Exchange Areas in Dauphin, Morris, Selkirk, Swan River, Steinbach, and Thompson LIRs retain NPA 204

With these options (Plans 4a and 4b), CO Codes assigned in existing NPA 204 would split as follows, with number changes required in one of the two areas:

Area	*Assigned CO Codes in NPA 204 (01-01-09)*	
	#/% of Total NPA 204 CO Codes	*Projected Exhaust Date*
104 Exchange Areas in Brandon, Melita and Winnipeg LIRs	366/63%	2067
140 Exchange Areas in Dauphin, Morris, Selkirk, Swan River, Steinbach, and Thompson LIRs	218/37%	2130

If 7-digit local dialling is maintained between NPA 204 and the new NPA, Code Protection would be required due to existing local calling arrangements between these regions as follows::

Exchange in Brandon, Melita or Winnipeg LIR with local calling to/from Exchanges in Dauphin, Morris, Steinbach, Swan River, Selkirk &/or Thompson LIR	**Exchanges in Dauphin, Morris, Steinbach, Swan River, Selkirk &/or Thompson LIR with local calling from/to an Exchange in Brandon, Melita or Winnipeg LIR**
Amaranth	Alonsa
Anola	Beausejour Lorette Ste Anne
Crystal City	Snowflake Manitou
Dugald	Lorette
Elie	Marquette Warren
Hazelridge	Lorette Beausejour
Inglis	Grandview

Miami	Carman Darlingford Manitou Morden
Oakbank	Lorette Beausejour Lockport Selkirk
Pilot Mound	Manitou Snowflake
Poplar Point	Marquette St Laurent Woodlands
Roblin	Grandview
Roland	Carman Morden Morris Plum Coulee Winkler
Sandy Lake	Erickson
Sanford	Morris St Adolphe Ste Agathe
Somerset	Manitou
Sperling	Carman Morris
St. Claude	Carman
St. Francois Xavier	Warren
Starbuck	Carman
Stephenfield	Carman
Stonewall	Marquette Stony Mountain Warren Woodlands Petersfield Selkirk Teulon
Swan Lake	Manitou
Winnipeg	Lockport Lorette St Adolphe Stony Mountain

Assessment: of Split Options:

The RPC does not recommend any of these Split Options for the following reasons. Between 37% and 63% of the people (estimated based on the percentage of CO Codes in each part of the NPA being split) would be affected by a telephone number change, which would be very inconvenient for those people and particularly expensive for business customers as they would be required to change their advertising, stationery, etc. In addition, costs for TSPs would be higher for a split due to the need to reprogram wireless telephones due to telephone number and Mobile Identity Number changes, modify back-office support and billing systems, etc.

One drawback of the split options is that the number of separate relief planning areas in Manitoba would be increased to two (2) compared to one (1) for the Distributed Overlay option. The use of a new NPA in a split configuration for the geographic area served by NPA 204 would be an inefficient use of numbering resources compared to an overlay option because it would require two new NPAs to be implemented in subsequent relief projects whereas only one new NPA would be required for the Distributed Overlay option.

Any split option in NPA 204 would cause discrimination against some Carriers in the new NPA since some Carriers may operate only one part of the province. Carriers that will operate in the area changing to the new NPA would incur implementation costs while Carriers that only operate in the area retaining NPA 204 would not have to incur costs.

5.2 Distributed Overlay

Under this option, a new NPA would be introduced as an overlay to serve the entire 204 area. It is assumed that local 10-digit dialling will become mandatory in NPA 204 area immediately prior to the Distributed Overlay.
Area code 204 and the new area code would be expected to exhaust in 2011 and 2119 respectively.

Assessment:

The RPC views this option as a viable Relief Option and preferable to all of the split options because it would not require telephone number changes that would inconvenience customers and would cost Carriers and customers less to implement than splits. Overlays are more convenient than splits for customers and are less expensive for business customers as they would not be required to change their advertising, stationery, etc. as no number changes would be required. Costs for TSPs would be lower for an overlay due to avoidance of the need to reprogram wireless telephones due to telephone number and Mobile Identity Number changes, lower costs to change back-office support and billing systems, etc.

The Distributed Overlay option would retain the existing boundaries of the NPA 204 area, thus maintaining the geographic identify of area code 204 with the entire province of Manitoba. In addition, it would provide the longest time frame before another exhaust would occur and relief would be required again in this region.

In addition, the Distributed Overlay option would not require any CO Code protection measures in Manitoba (excluding that required for the Creighton Exchange Area in neighbouring NPA 306) to be implemented and managed by the CNA at additional cost to the industry, as may be

required for the split options. In addition the distributed overlay would not create a more complex 7 and 10 digit local dialling plan for some Exchange Areas if CO Code protection were not implemented under all of the Split options.

6. SUMMARY OF RELIEF OPTIONS

The following table summarizes the Relief Options, Projected Exhaust Dates, Relief Timing and Type, and Impacts:

QUESTION – WHY ARE PEDs HIGHLIGHTED IN YELLOW BELOW DIFFERENT WITHIN OPTIONS 1 A & B DEPENDING ON WHETHER THE AREA GETS TO RETAIN 204 OR A NEW NPA? SAME QUESTION FOR 2A & B AND 4A & B?

FOR RELIEF DATE COLUMN, WHY IS RELIEF DATE 1 YEAR FOR SOME AND 2 YEARS FOR OTHERS PRIOR TO PED? CAN WE USE ONE YEAR IN ADVANCE AS A STANDARD?

Plan		Projected Exhaust Dates		Relief - Timing & Type		Quantity/% CO Codes affected by No. Changes	Local Dial # of digits
#	Description	NPA 204	New NPA	**Relief Date**	Type		
1a	Split – Winnipeg LIR retains NPA 204, remaining LIRs change to new NPA	2015 2104	 2083 	**2013** (204) **2081** (new NPA) **2102** (204)	S ? ?	332/57% ? ?	7 ? ?
1b	Split - Winnipeg LIR changes to new NPA, remaining LIRs retain NPA 204	2015 2082 	 2104	**2013** (204) **2081** (204) **2102** (new NPA)	S ? ?	252/43% ? ?	7 ? ?
2a	Split - Melita, Morris, Steinbach & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA	2015 2070 	 2145	**2013** (204) **2068** (204) **2143** (new NPA)	S ? ?	252/43% ? ?	7 ? ?
2b	Split - Melita, Morris, Steinbach & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204	2015 2145	 2069 	**2013** (204) **2067** (new NPA) **2143** (204)	S ? ?	332/57% ? ?	7 ? ?
3a	Split - Selkirk, Thompson & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA	2015 2056 	 2229	**2013** (204) **2054** (204) **2227** (new NPA)	S ? ?	218/37% ? ?	7 ? ?
3b	Split - Selkirk, Thompson & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204	2015 2229	 2056 	**2013** (204) **2054** (new NPA) **2227** (204)	S ? ?	366/63% ? ?	7 ? ?
4a	Split - Brandon, Melita & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA	2015 2067 	 2130	**2013** (204) **2065** (204) **2128** (new NPA)	S ? ?	218/27% ? ?	7 ? ?
4b	Split - Brandon, Melita & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204	2015 2130	 2066 	**2013** (204) **2064** (new NPA) **2128** (204)	S ? ?	366/63% ? ?	7 ? ?

Plan		Projected Exhaust Dates		Relief - Timing & Type		Quantity/% CO Codes affected by No. Changes	Local Dial # of digits
#	Description	NPA 204	New NPA	**Relief Date**	Type		
5	Distributed Overlay of New NPA on NPA 204	2015	2119	**2013** (204) **2117** (new NPA)	O ? ?	Nil/0% ? ?	10 10 10
Key	7-D = 7-digit local dialling retained, 10-D = mandatory 10-digit local dialling, O = Overlay, S= Split, ? = Unknown (subsequent relief type, Qty of CO Codes affected by No. Changes, and dial plan)						

7. COMPARATIVE ASSESSMENT OF RELIEF OPTIONS

The RPC identified 9 Relief Options in section 5 of this document. A Pro, Neutral or Con (P, N or C) rating was established for each Relief Option for each of the following attributes. The results are listed in the table below the list of attributes.

A. NPA Code Conservation – quantity of new NPAs required in NPA 204 within the next 20 years (P = 0 new NPAs; N = 1 new NPA; C = 2 or more new NPAs)
B. Number of separate Relief Planning areas in Manitoba in the long term (P = decrease; N = stays same; C = increase)
C. Quantity of Number Changes for existing customers' numbers (P = none; C = many)
D. Level of Carrier Costs – e.g., including implementation, customer awareness, rate of return (P = Low; N = Medium; C = High)
E. Time required to implement relief, i.e., time between the CRTC's Decision date and the date when CO Codes in the new/relief NPA can be activated (P = shortest; N medium = N; longest = C)
F. Longevity – the length of time between this relief and subsequent relief activity in NPA 204 (e.g., a new area code) (P = 15 or more years; N = 9 through 14 years; C = within 8 years)
G. Established Geographic Identities – changes in boundaries of existing NPAs (P = none; C = 1 or more existing NPAs affected)
H. New Geographic Identities –boundaries of new NPA align with boundaries of known areas (e.g., existing NPA areas, provinces) or identifiable geographical features (e.g., rivers, islands) (P = aligns with existing NPA boundaries,; N = aligns with geographical features but not with existing NPA boundaries; C = aligns with neither existing NPA boundaries, nor identifiable geographical features)
I. Adds areas with mix of 7- and 10-digit local dialling in NPA 204 (P = none; N = minor amount; C = significant)
J. Consistent with the transition towards universal 10-digit local dialling, the Uniform Dialling Plan and future NANP Expansion (P = Yes; C = No)
K. Reprogram Mobile Phones – requirement to reprogram wireless devices to accommodate the number changes (P = low; N = Medium; C = High)
L. Potential maximum quantity of NPAs in an Exchange Area in the next 20 years (P = 1 NPA; N = 2 NPAs; C = 3 NPAs)
M. Does the option consider the potential direction for future reliefs in NPA 204? (P = Yes; C = No)

Relief Plan		Pro, Neutral or Con for Each Attribute													Rating
#	**Description**	**A**	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**	**L**	**M**	
1a	Split – Winnipeg LIR retains NPA 204, remaining LIRs change to new NPA	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
1b	Split - Winnipeg LIR changes to new NPA, remaining LIRs retain NPA 204	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
2a	Split - Melita, Morris, Steinbach & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
2b	Split - Melita, Morris, Steinbach & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
3a	Split - Selkirk, Thompson & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
3b	Split - Selkirk, Thompson & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
4a	Split - Brandon, Melita & Winnipeg LIRs retain NPA 204, remaining LIRs change to new NPA	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
4b	Split - Brandon, Melita & Winnipeg LIRs change to new NPA, remaining LIRs retain NPA 204	N	N	C	C	C	P	C	C	N	C	C	P	C	-6
5	Distributed Overlay of New NPA on NPA 204	N	C	P	P	P	P	P	P	P	P	P	N	P	9

Note: None of the options require Exchange Area boundary changes.

If P, N and C are assigned a weighting of +1, 0 and -1, respectively, then analysis of the above table gives the highest rating of 9 points to Plan 5 Distributed Overlay of New NPA on NPA 204, and the next highest rating of -6 points to each of the Split Plans 1a, 1b, 2a, 2b, 3a, 3b. 4a and 4b.. Plan 5 is clearly superior when assessed using the above criteria.

8. DIALLING IMPACTS FOR LOCAL CALLS

Currently the dialling for local calls within NPA 204 and across its boundaries is as follows:

- 7-digit dialling for local calls within NPA 204
- in addition to providing 7-digit dialling for local calls from NPA 204, some Telecommunications Service Providers permit 10-digit dialling, or 10 and 11-digit dialling,
- 7-digit dialling for local calls from Flin Flon in NPA 204 to Creighton SK in adjacent NPA 306
- 7-digit dialling for local calls from Creighton SK in adjacent NPA 306 to Flin Flon in NPA 204
- no local calling between NPA 204 and adjacent Canadian NPAs 807 & 867, and US NPAs 218 & 701

After NPA relief, dialling for local calls will be as follows:

<table>
<tr><td rowspan="2">Type of Relief</td><td colspan="4">Local calls originating in NPA 204 and new NPA</td><td>Local calls originating in adjacent NPAs</td></tr>
<tr><td>Within NPA 204</td><td>Within new NPA</td><td>Between NPA 204 and new NPA</td><td>From NPA 204 &/or new NPA to adjacent NPA 306 (Flin Flon MB to Creighton SK)</td><td>From NPA 306 (Creighton) to NPA 204 &/or New NPA (Flin Flon)</td></tr>
<tr><td>Split</td><td>7-digit dialling retained</td><td>7-digit dialling provided</td><td>7-digit dialling eliminated, and mandatory 10-digit dialling introduced (see below for potential exception)</td><td>7-digit dialling eliminated, and mandatory 10-digit dialling introduced (see below for potential exception)</td><td rowspan="2">7-digit dialling eliminated, and mandatory 10-digit introduced, OR 7-digit dialling retained (see below)</td></tr>
<tr><td>Overlay</td><td colspan="4">7-digit dialling eliminated, and mandatory 10-digit dialling introduced</td></tr>
</table>

The Canadian NPA Relief Planning Guideline section 4.10 specifies that code protection be eliminated on relief, which means mandatory 10-digit dialling must be introduced for all local calls across NPA boundaries, unless the CRTC approves otherwise. An exception would not normally be justified if it would affect the life of the relief. In addition, if the amount of Code Protection is sufficient to affect the life of the relief it would create a significant administrative burden for managing it,

An exception to allow 7-digit dialling to be retained after a split for cross-NPA boundary local calls originating in NPA 204 and the new NPA would require code protection in all the exchanges listed in the local dialling tables in section 5, and in some other neighbouring exchanges that are not listed. This could affect the life of the relief and would increase administrative burden.
Given the large amount of code protection that would be required to maintain a standard 7-digit local dialling standard for these split options, and the administrative burden this would create on the industry, the RPC recommends that these exceptions not be implemented in the event that a Split option is ordered by the CRTC.

An exception to allow 7-digit dialling to be retained after an overlay for local calls from Creighton SK in adjacent NPA 306 to Flin Flon in NPA 204 & the new NPA would require minimal code protection. Creighton's 2 CO Codes would need to be protected only in the Flin Flon Exchange in the new NPA; these 2 CO Codes are not protected in NPA 204 as they are already assigned elsewhere in NPA 204. Any additional CO Codes assigned in the future in Creighton Exchange Area and the Creighton Local Calling Area would require code protection for corresponding CO Codes in the Flin Flon Exchange Area to maintain 7-digit local dialling as the standard in Creighton. In addition, any CO Codes assigned in the future in the Flin Flon Exchange Area would require code protection for corresponding CO Codes in the Creighton Exchange Area and the Creighton Local Calling Area. This exception would avoid the need for a mix of 7 and 10-digit local dialling in Creighton in the neighbouring province. This exception would not apply to local calls in the reverse direction (i.e. originating in NPA 204) since mandatory 10-digit dialling would still be required on all local calls originating within the overlay area in Manitoba.

Given the small amount of code protection that would be required to maintain a standard 7-digit local dialling standard in Creighton, and the fact that the protected CO Codes in NPA 204 and the new relief overlay NPA could be assigned in distant parts of Manitoba thus making effective use of the CO Codes, the RPC recommends that the exceptions for Creighton be implemented.

The Toll call dialling arrangement for NPA 204 will not be impacted by NPA relief.

9. IMPLEMENTATION OF MANDATORY 10-DIGIT LOCAL DIALLING PRIOR TO OVERLAYS

Equipment used by local exchange carriers to provide service in some Exchange Areas, typically those serving small communities, is currently able to provide 7-digit local dialling and may be able to provide10-digit local dialling on a permissive basis. This equipment may also be able to route calls to an announcement, e.g. when 10-digit dialling is mandatory, or an NPA has changed, but may not be able to connect a call following an announcement (i.e., cut-through), as is usually required during transition to an overlay. Investments that would be required to upgrade or replace network elements to provide transition announcements in some communities could be significant relative to their size, and such investments would provide a capability that would only be used for a short time, i.e. during the dialling transition period.

In Telecom Decision CRTC 2006-26, the CRTC addressed the above situation and established a process and requirements for Carriers to follow. Based on this Decision, the RPC recommends the same approach be adopted for NPA 705.

In situations where TSPs have network limitations in providing recorded announcements with call completion, and/or the provision of such announcements and call completion would not be cost effective (e.g., for companies serving small and/or remote locations with legacy technology, or for wireless carriers), it is recommended that such TSPs may submit written requests to CRTC staff seeking relief from the obligation of providing industry standard network announcements with automatic call completion on calls dialled using 7 digits prior to the implementation of mandatory 10-digit local dialling. In such circumstances, those TSPs seeking relief shall be required to inform their customers of the 10-digit dialling requirement by:

- sending monthly bill inserts (to be submitted at least one month prior to insertion to CRTC staff for approval) in each of the 4 months immediately prior to the month when mandatory 10-digit local dialling is scheduled to be implemented;
- placing two notices in local newspapers (if available), one during the month prior to the month when mandatory 10-digit local dialling is scheduled to be implemented, and one during the month when mandatory 10-digit local dialling is scheduled to be implemented;
- sending a personal letter to each affected customer, to be received 10 days prior to the implementation date of mandatory 10-digit local dialling; and
- placing information on the TSPs' websites in a prominent, highly visible location for the minimum period of about 5 months ending at the end of the month when mandatory 10-digit local dialling is scheduled to be implemented.

10. CO CODES FOR INITIAL CODE ASSIGNMENTS AND CO CODES FOR INITIAL CODE ASSIGNMENTS FOR NEW ENTRANTS ONLY

When area code relief planning becomes necessary, the CRTC usually directs that quantities of CO Codes in an exhausting NPA be set aside prior to relief as unavailable for assignment in order to ensure that some CO Codes in the exhausting NPA will be available after relief via an overlay for initial code assignments for new entrants only and for initial code assignments for applicants in general or those already providing service in the NPA. In the absence of either a Jeopardy Condition or exhaust of the NPA, or a split, the set-aside CO Codes would only be available after relief via an overlay, and any set-aside CO Codes remaining two years after the overlay would be returned to the general pool.

Direction regarding set-aside CO Codes is provided by subparagraphs a), b) and c) of the 5th paragraph of section 9.1 of the Canadian NPA Relief Planning Guideline, which requires that the RPC establish the following as part of the JCP:

a) *If the CRTC has directed, or the RPC has recommended (e.g., per section 5.2 of this guideline), that CO Codes in the exhausting NPA be set aside for initial code assignments for New Entrants only for assignment following relief, then, if all other available CO Codes in the exhausting NPA have been assigned, or if the CRTC has approved a split, these set-aside codes should be made available during the Jeopardy Condition for assignment as initial codes for New Entrants only, i.e. for assignment prior to relief.*

b) *If the CRTC has directed, or the RPC has recommended (e.g., per section 5.2 of this guideline), that CO Codes in the exhausting NPA be set aside for initial code assignments for applicants in general for assignment following relief, then the JCP should specify that these set-aside CO Codes will become available for general assignment when a Jeopardy Condition is in effect*. …

c) *If a Jeopardy Condition is in effect and, if all other available CO Codes in the exhausting NPA have been assigned, CRTC staff may make some or all of the CO Codes in the two pools identified in a) and b), above, available for assignment to any entity for any purpose.*

However, in Telecom Notice of Consultation CRTC 2009-309, Establishment of a CISC ad hoc committee for area code relief planning for area code 204 in Manitoba, issued by the Commission on 28 May 2009, the CRTC noted the CNA has declared a jeopardy condition for area code 204 and that area code 204 is projected to exhaust within only 19 months. Accordingly due to the severe shortage of CO Codes and early projected exhaust date, the CRTC directed that code rationing measures be implemented immediately. Paragraph 10 described these measures as follows:

> "*The CO code rationing measures will be in place until 66 days before the code relief is implemented. These measures will permit CO code holders in area code 204 to obtain the number of CO codes identified in their 30 April 2009 Jeopardy-Numbering Resource Utilization Forecasts (J-NRUFs) or in future J-NRUFs, the applicable J-NRUF to be determined in consultation with Commission staff, up to a maximum of 10 CO codes per year. New entrants who do not have any CO codes in area code 204 will be permitted,*

within the first year of entering the Manitoba market, to obtain up to 20 CO codes as identified in their J-NRUFs. Thereafter, these new entrants will be subject to the above-noted code rationing measures. The Commission believes that these measures will extend the projected exhaust to at least 1 January 2013."

Accordingly no CO Codes in NPA 204 have been set aside by the CRTC prior to relief as unavailable for assignment in order to ensure that some CO Codes in the exhausting NPA will be available after relief via an overlay for initial code assignments for new entrants only and for initial code assignments for applicants in general or those already providing service in the NPA.

As the CRTC has ordered the implementation of CO Code rationing, the RPC recommends that there is no need to set aside CO Codes in the exhausting NPA after relief via an overlay for initial code assignments for new entrants only and for initial code assignments for applicants in general or those already providing service in the NPA.

11. PROPOSED NPA RELIEF IMPLEMENTATION SCHEDULE

The following table identifies the major implementation activities, deliverables and associated dates based upon the tasks identified in the Canadian NPA Relief Planning Timeline as well as major events in both the CAP and NIP. All TSPs and telecommunications service users should plan their internal relief activities in accordance with the following Relief Implementation Schedule.

RELIEF IMPLEMENTATION SCHEDULE
NPA 204 Relief
Mandatory 10-Digit Local Dialling and Overlay NPA

	ITEM	PRIME	START
1	CNA identifies NPA exhaust and notifies by e-mail CRTC staff, CSCN, NANPA & CISC that the NPA will exhaust*	CNA	
	CNA declares Jeopardy Condition in NPA 204		
2	CRTC issues Public Notice regarding RPC Ad Hoc CISC and Interested Parties list	CRTC	
3	CNA announces the date for the initial NPA Relief Planning face-to-face meeting, requests contributions and issues the initial press release.	CNA	
	CNA holds NPA 204 Stakeholder conference call to discuss 11 year advancement of Projected Exhaust Date to September 2010		
4	CNA completes and distributes IPD to RPC	CNA	
5	RPC participants review IPD & submit contributions to RPC	RPC	5 June 200
6	CNA chairs initial RPC meeting to start development of PD, RIP & PL, & schedules future meetings/conference calls including creation & consultation with CATF and NITF	CNA RPC	?
8	CNA chairs subsequent RPC meetings/conference calls to finalize PD, RIP & PL	CNA RPC	?
9	CNA revises and forwards Planning Document (PD), RIP to the CISC and CRTC for approval	CNA	
10	Special Types of Telecommunications Service Users (911 PSAPs, alarm companies, ISPs, paging companies, etc.) to identify any concerns to RPC & CRTC	Special Users	
11	CRTC issues Telecom Decision approving the Relief Method, Relief Date, New NPA & Relief Implementation Plan (RIP)	CRTC	
12	CNA issues media release and sends approved RIP to TRA, CLNPC & RPC participants	CNA	
13	CNA submits Planning Letter and RIP to NANPA	CNA	
14	NANPA Posts Planning Letter	NANPA	
15	Task Forces, TSPs and users execute the RIP	TSPs	
16	All Telecom Service Providers (TSPs) to develop and file individual consumer awareness programs with the CRTC (may be done collectively by Telecommunications Alliance)	TSPs	
17	All TSPs commence and continue consumer awareness activities	TSPs	
18	All TSPs to notify all of their business & special customers of 10-digit dialling & Overlay NPA	TSPs	
19	All TSPs to notify all customers including residence at least once	TSPs	
20	TSPs to submit Progress Report #1 to NITF and CATF	TSPs	
21	NITF and CATF develop & submit Progress Report #1 to RPC	NITF & CATF	
22	RPC develops & submits Progress Report #1 to CISC/CRTC	RPC	
23	Telcordia TRA database updates to include new NPA (6 months prior to either: a) relief date for an overlay or b) start of permissive dialling period for a split)	Telcordia TRA	
24	All Telecommunications Service Users (including Special Users 911 PSAPs, alarm companies, ISPs, paging companies, etc.) to implement changes to their telecom equipment & systems to accommodate 10-digit local dialling	Telecom Users	
25	All Telecommunications Service Users (including Special Users 911 PSAPs, alarm companies, ISPs, paging companies, etc.) to implement changes to their telecom equipment & systems to accommodate new overlay NPA	Telecom Users	
26	Payphone Providers Reprogram Payphones	Payphone Providers	

	ITEM	PRIME	START
27	TSPs and database owners/operators to modify systems and industry databases	Database Owners	
28	Operator Services & Directory Assistance Readiness	TSPs	
29	Directory Publisher to include new dialling instructions for NPA 705 in a directory published prior to the Relief Date	Directory Publishers	
30	Directory Publisher Readiness for overlays (ability to identify the NPA in telephone numbers in the directory published after the Overlay NPA is activated)	Directory Publishers	
31	9-1-1 PSAP Systems and Databases Readiness	PSAPS & TSPs	
32	9-1-1 TSP Readiness	TSPs	
33	International Gateway Switch Translations Readiness for new NPA	Int'l TSPs	
34	Canadian Local Number Portability Consortium (CLNPC) Database Readiness for new NPA	CLNPC NPAC	
35	Toll Free SMS Database Readiness for new NPA	Toll TSPs	
36	ISCP & Service Order Systems Readiness	TSPs	
37	TSPs to submit Progress Report #2 to NITF and CATF	TSPs	
38	NITF and CATF develop & submit Progress Report #2 to RPC	NITF & CATF	
39	RPC develops & submits Progress Report #2 to CISC/CRTC	RPC	
40	TSPs apply for Overlay NPA Test CO Codes and TNs (no more than 6 months and no less than 66 days prior to start date for testing) (not required if a Boundary Extension Overlay is approved)	TSPs	
41	Develop Inter-Carrier Network Test Plans (individual carriers to make arrangements in accordance with interconnection agreements) (not required if a Boundary Extension Overlay is approved)	TSPs	
42	Activation date for Overlay NPA Test CO Codes and Test Numbers in network (prior to start date for Inter-Carrier Testing) (not required if a Boundary Extension Overlay is approved)	TSPs	
43	Date by which Carriers must route all calls using 10-digit signalling (i.e., cease use of 7-digit signaling) for local traffic sent to and received from other Carriers (start date for testing)	TSPs	
44	Inter-Carrier Testing Period (starts 2 months prior to 7- to 10-Digit Dialling Transition Period – subject to Inter-Carrier Network Test Plans – can continue up to introduction of new NPA)	NITF TSPs	
45	Phase-in of 7- to 10-Digit Dialling Transition Period announcements	TSPs	
46	TSPs to submit Progress Report #3 to NITF and CATF	TSPs	
47	NITF and CATF develop & submit Progress Report #3 to RPC	NITF & CATF	
48	RPC develops & submits Progress Report #3 to CISC/CRTC	RPC	
49	Phase-in of mandatory 10-digit dialling announcements	TSPs	
50	Relief Date (earliest date when CO Codes in new NPA may be activated in PSTN)		
51	TSPs develop & submit Final Progress Report #4 to CATF and NITF	TSPs	
52	NITF & CATF develop & submit Final Progress Report #4 to RPC	NITF & CATF	
53	RPC develops & submits Final Report #4 to CISC/CRTC	RPC	
54	TSPs disconnect Test Codes & Numbers (start one month after relief date) (not required if a Boundary Extension Overlay is approved)	TSPs	
55	Change Mandatory 10-Digit Dialling Announcement to standard announcement (mandatory announcement required for a minimum of 3 months)	TSPs	

* When an NPA is projected to exhaust within a 72 months period, the CNA must commence the Relief Planning process.

** In the event that a new R-NRUF or actual demand indicates that the Projected Exhaust Date will change significantly, the CNA may convene a meeting of the NPA Relief Planning Committee to review the issue and make a recommendation to the CISC and CRTC.

12. JEOPARDY CONTINGENCY PLAN (JCP)

Prior to the development of this JCP, CO Code rationing measures were ordered by the CRTC in Telecom Notice of Consultation 2009-309. These measures came into effect 2 June 2009 and will remain in effect until 66 days before the code relief is implemented. The measures permit CO code holders in area code 204 to obtain the number of CO codes identified in their 30 April 2009 Jeopardy-Numbering Resource Utilization Forecasts (J-NRUFs) or in future J-NRUFs, the applicable J-NRUF to be determined in consultation with Commission staff, up to a maximum of 10 CO codes per year. New entrants who do not have any CO codes in area code 204 will be permitted, within the first year of entering the Manitoba market, to obtain up to 20 CO codes as identified in their J-NRUFs. Thereafter, these new entrants will be subject to the above-noted code rationing measures. The CRTC believes that these measures will extend the projected exhaust to at least 1 January 2013.

The RPC has developed the following JCP for inclusion in the PD for NPA 204, based on recent JCPs submitted by other RPCs and the Canadian NPA Relief Planning Guideline dated 2 June 2009.

This JCP shall remain in effect until either the Jeopardy Condition is suspended or 66 days before the Relief Date. A CO Code Applicant needing to activate a CO Code in the minimum amount of time (i.e., 66 days) can obtain a CO Code from the post-relief inventory by applying 66 days prior to the Relief Date.

During a Jeopardy Condition, CO Code Applicants shall submit all CO Code applications and related correspondence for the Jeopardy NPA to CRTC staff in addition to the CNA.

During a Jeopardy Condition, the CNA shall only assign CO Codes from the exhausting NPA to a CO Code Applicant upon approval of CRTC staff.

The following measures shall be implemented by the CNA and all CO Code Holders in NPA 204 when this JCP is approved by the CRTC and while a Jeopardy Condition is in effect.

1) Carriers and/or Telecommunications Service Providers (TSPs):

   a) shall age disconnected residential telephone numbers for a maximum of two months;
   b) shall age disconnected wireless telephone numbers for a maximum of three months;
   c) shall age disconnected business telephone numbers for a maximum of six months. Under special circumstances, the six month aging limit for business telephone numbers may be extended to twelve months if required to accommodate local directory publishing dates for high volume call-in applications (e.g., heavily advertised local business numbers such as radio talk shows, food ordering services, ticket sales, chat lines), or for numbers associated with public service emergency applications or for numbers advertised in directories for which customers have requested reference of calls;
   d) shall return all CO Codes that are not being used nor intended to be used to directly serve customers to the assignment pool within two months (e.g., plant test codes);

e) should work towards, and encourage existing customers, to either activate or return the reserved numbers in order to bring the reserved quantity down to a maximum of 10% of the quantity of numbers In-Service for that customer;
f) shall not allow the quantity of reserved numbers to be increased by new reservation requests by existing customers to more than 10% of the quantity of numbers in service for that customer. In the case of new customers, number reservations shall be limited to 10% of the total quantity of telephone numbers being placed into service for that customer;
g) shall, within 45 days from the date that the CNA declares a Jeopardy Condition, submit a Part 1 Form for each remaining reserved CO Code either returning the reserved CO Code to the CNA or requesting assignment of the reserved CO Code. Once the 45-day period has elapsed, the CNA shall make available for general assignment all CO Codes that are still reserved and have not been applied for as assignments on a Part 1 Form received by the CNA. Within 60 days from the date that the CNA declares a Jeopardy Condition, the CNA shall report to CRTC staff and the RPC as to how many of these codes have been assigned or made available for general assignment;
h) shall not be permitted to obtain a new CO Code reservation;
i) shall place all CO Codes assigned prior to the Jeopardy Condition being declared In-Service within three months of the effective date for CO Code activation in the network, or within three months of the date that the Jeopardy Condition was declared. If the CO Code is an Initial Code and the CO Code Holder can demonstrate that, due to circumstances beyond its control, the In-Service date has been delayed beyond the applicable timeframe, the CNA may grant an extension of up to two months to the In-Service date. The CNA shall initiate reclamation procedures for all CO Codes that have not been placed In-Service within these timeframes;

2) For new applications for Initial Codes, each CO Code Holder shall certify that the CO Code will be activated in the network and placed In-Service within four months of the date of application for the Code. If the CNA does not receive a Part 4 Form within this timeframe, confirming that the CO Code has been placed In-Service, the CNA will initiate reclamation measures. If the CO Code Holder can demonstrate that, due to circumstances beyond its control, the In-Service date has been delayed not more than six months from the original application date, the CNA may grant an extension to the In-Service date, so long as the In-Service date is not more than six months beyond the original application date. If the In-Service date has been delayed more than six months from the original application date, then the CNA shall reclaim the Code.

3) When applying for an Additional Code for Growth, a CO Code Holder who is submitting a Part 1 form and an Appendix B worksheet shall also submit a completed Supplementary form for a Growth CO Code Application (attached) which certifies and/or provides the following information for the specific for the switching entity/POI and Exchange Area when the Growth CO Code is being requested in a Jeopardy Condition:

a) certification that all held telephone numbers have been released;
b) certification that reserved numbers do not exceed ten percent of the total quantity of numbers as defined in Appendix G of the Canadian CO Code (NXX) Assignment Guidelines;
c) certification that each reseller/dealer had been advised of the Jeopardy Condition and the requirement that they would only be allocated additional numbers during

the Jeopardy Condition on the provision to the CO Code Holder of written confirmation that their number inventory has been reduced to an amount less than two times the highest quantity of customer numbers assigned in any month during the previous 12 months. Additional numbering resources will only be provided by the CO Code Holder to the reseller/dealer to the extent that the reseller's/dealer's inventory can only increase up to a maximum of three months' inventory;

d) confirmation that the Part 1 form submitted with the application has the Jeopardy Condition box in section 1.6 checked to certify that the existing CO Codes are projected to exhaust within 4 months of the date of application or within the period specified within an approved JCP, and that the Months-to-Exhaust is documented on an Appendix B submitted to the CNA;

e) a completed Telephone Number Utilization Report;

f) confirmation that the requested Growth CO Code was forecasted in the most recent NRUF, or an explanation as to why it was not is attached; and,

g) confirmation that the requested Growth CO Code will be placed In-Service within four months of the date of assignment.

4) Any Growth CO Codes assigned after the implementation of this JCP must be activated in the network and placed In-Service within four months of assignment. In the event that a CO Code Holder is unable to place the CO Code In-Service within four months of the date of assignment, the CO Code Holder must submit a written request for extension to the CNA. Such written requests must include documentation explaining the reason(s) for the missed date and proposing the new In-Service date. If the explanation includes reasons beyond the control of the CO Code Holder, the CNA may extend the In-Service date a maximum of one month. If the CO Code Holder does not place the CO Code In-Service within the one-month extension, the CNA shall reclaim the CO Code immediately at the end of the one-month extension unless CRTC staff approves a further extension.

5) A Carrier that has multiple switching entities within an Exchange Area shall examine the possibility of, and implement where feasible, number sharing between those switches as a potential method to delay requirements for additional CO Codes.

6) The CNA will compare the initial J-NRUF input to the recent NRUF inputs, in order to assess forecasting trends. The CNA shall monitor all inputs and shall test them for reasonableness in consultation with the Carrier. If the CNA is dissatisfied with the reasonableness, or the rationale provided for the deviations, then the matter will be referred to the Commission.

7) The CNA will request subsequent J-NRUF input from all current and prospective CO Code Holders quarterly until 3 months before relief is provided. If one or more R-NRUFs have already been conducted, and depending on the severity of the Jeopardy Condition, the CNA may defer a J-NRUF by up to two months if such a deferral brings the timing of that J-NRUF and subsequent J-NRUFs into alignment with other NRUFs that are conducted at 12, 6 or 3 month intervals. Subsequent J-NRUF input will be compared with the initial J-NRUF input to evaluate the effectiveness of the JCP. The CNA shall monitor all J-NRUF inputs and shall test them for reasonableness in consultation with the TSP. If the CNA is dissatisfied with the reasonableness, or the rationale provided for the deviations, then the matter will be referred to the Commission.

8) A CO Code Applicant must have submitted a completed J-NRUF to the CNA before the CNA may assign a CO Code to that CO Code Applicant.

9) When a CO Code Applicant requests more CO Codes than it identified in its most recent J-NRUF forecast, the CNA will discuss the matter with the CO Code Applicant, and if the CO Code Applicant wishes to proceed with the request, the CNA will forward the request to CRTC staff for consideration.

10) The CO Codes identified in the NPA CO Code Inventory Chart as "CO Codes unassignable prior to a Jeopardy Condition that become assignable in a Jeopardy Condition" will be assigned in the order determined by the RPC after all CO Codes which are "Available for Assignment as of Date Month Year" have been assigned.

11) After each J-NRUF, the CNA shall provide the Commission and the RPC participants with a report providing an updated NPA CO Code Inventory Chart for the NPA in jeopardy as well as the aggregate results of the most recent J-NRUF.

12) Exceptional issues or concerns may be referred by the CNA, or by individual entities (with a courtesy copy to the CNA), to the Commission for resolution.

13) If the CNA determines that the implementation of the JCP has not extended the Projected Exhaust Date of the NPA beyond the Relief Date, the CNA will consult with Commission staff and further CO Code conservation and assignment procedures may be ordered by the Commission (e.g., additional rationing, lottery, etc.).

14) in paragraph 10 of Telecom Notice of Consultation CRTC 2009-309, Establishment of a CISC ad hoc committee for area code relief planning for area code 204 in Manitoba, issued by the Commission on 28 May 2009, the CRTC directed that code rationing measures be implemented immediately as follows:

> "*The CO code rationing measures will be in place until 66 days before the code relief is implemented. These measures will permit CO code holders in area code 204 to obtain the number of CO codes identified in their 30 April 2009 Jeopardy-Numbering Resource Utilization Forecasts (J-NRUFs) or in future J-NRUFs, the applicable J-NRUF to be determined in consultation with Commission staff, up to a maximum of 10 CO codes per year. New entrants who do not have any CO codes in area code 204 will be permitted, within the first year of entering the Manitoba market, to obtain up to 20 CO codes as identified in their J-NRUFs. Thereafter, these new entrants will be subject to the above-noted code rationing measures. The Commission believes that these measures will extend the projected exhaust to at least 1 January 2013."*

Supplementary form for a Growth CO Code Application – Page 1 of 2

This form is required with each request for an Additional Code for Growth in an NPA where a Jeopardy Condition is in effect. It should be submitted to the CNA together with the Part 1 and Appendix B forms that are required for an application for an Additional Code for Growth. See the Part 1 form for information on how and where to submit the form.

I hereby certify that the following information is true and accurate to the best of my knowledge and has been prepared in accordance with Special Conservation Procedures for a Jeopardy Condition contained in the Canadian Relief Planning Guidelines or the applicable approved Jeopardy Contingency Plan.

_____	_____	_____
Signature of Authorized Representative of Code Holder	Title	Date

Contact information:

Entity Name:	_____	Contact Name:	_____
Address:	_____	City, Province, Postal Code:	_____
Telephone:	_____	Facsimile:	_____
E-mail:	_____		

Switch Identification (Switching Entity/POI) CLLI: _____ **Exchange Area:** _____

For the above Switch Identification and Exchange Area for which a Growth CO code is requested:

- ☐ I certify that all held telephone numbers have been released
- ☐ I certify the total quantity of reserved numbers does not exceed 10% of the total quantity of telephone numbers as defined in Appendix G of the Canadian CO Code (NXX) Assignment Guidelines
- ☐ I certify that each reseller/dealer has been advised of the Jeopardy Condition and the requirement that they would only be allocated additional numbers during the Jeopardy Condition on the provision to the CO Code Holder of written confirmation that their number inventory has been reduced to an amount less than two times the highest quantity of customer numbers assigned in any month during the previous 12 months. Additional numbering resources will only be provided by the CO Code Holder to the reseller/dealer to the extent that the reseller's/dealer's inventory can only increase up to a maximum of three months' inventory.
- ☐ The Part 1 form submitted with the application has the Jeopardy Condition box in section 6 checked (this certifies that the existing CO Codes are projected to exhaust within 4 months of the date of the application or within the period specified in an approved Jeopardy Contingency Plan, and that the months-to-exhaust is documented on an Appendix B submitted to the CNA).
- ☐ The Telephone Number Utilization Report on the page 2 of this form has been completed.
- ☐ The requested Growth CO Code was forecasted in the most recent NRUF, or an explanation as to why it was not is attached.
- ☐ The requested Growth CO Code will be placed In-Service within four months of the date of assignment.

Supplementary form for a Growth CO Code Application - Page 2 of 2 - Telephone Number Utilization Report

(Note: if the spreadsheet below does not show on your display, please change the Word view to "Print Layout" or "Reading Layout")

NPA	NXX	Portable (Y or N)	Quantities of Telephone Numbers							% Utilization
			Reseller Inventory	Assigned	R&H	Admin	Ported Out	Available	Aging	
TOTAL										

% Utilization = (Reseller Inventory+Assigned+R&H+Admin+Ported Out+Aging)/(100)

Remarks: _____

_____

_____

Telephone Number Utilization Report

Entity Name: _____ **Contact name:** _____
Address : _____ **City, Prov/Terr, Postal code:** _____
Telephone: _____ **Facsimile:** _____
E-Mail : _____
Date : _____

Telephone Number Utilization for: **Switch/POI CLLI:**
Exchange Name **Province / Territory :**

NPA	NXX	Portable (Y or N)	Quantities of Telephone Numbers							% Utilization
			Reseller Inventory	Assigned	R&H	Admin	Ported Out	Available	Aging	
TOTAL										

% Utilization = (Reseller Inventory+Assigned+R&H+Admin+Ported Out+Aging)/(100)

NPA 204 CO Code Inventory Chart

The following chart and the instructions it contains will apply in NPA 204 in a Jeopardy Condition.

The chart shown below lists quantities of CO Codes unassignable prior to a Jeopardy Condition, CO Codes that become assignable in a Jeopardy Condition, and CO Codes in NPA 204 assigned and In-Service as of 5 June 2009. For an Overlay option it identifies 27 CO Codes that are unassignable prior to a Jeopardy Condition, 8 of which become assignable in a Jeopardy Condition. For a Split option it identifies 27 CO Codes that are unassignable prior to a Jeopardy Condition, 8 of which become assignable in a Jeopardy Condition. The CO Codes that become assignable in a Jeopardy Condition shall only be made available for assignment when all other available CO Codes have been assigned. The types of CO Codes that become assignable in a Jeopardy Condition should be made available in the same order as listed in the chart.

		Overlay	Split
A	**Total CO Codes in an NPA (NXX format)**	**800**	**800**
B	**CO Codes unassignable prior to a Jeopardy Condition**		
	N11 Service Codes (211, 311, 411, 511, 611, 711, 811, 911)	8	8
	Special Use Codes (555, 950 & 976)	3	3
	Protected Code(s)	0	0
	Home NPA Code (204)	1	1
	Current Neighbouring NPA Codes (306 and 807 - see Note 1)	2	2
	Future Canadian Geographic NPA Codes (273, 387, 431, 460, 579, 584, 879 - see Note 2)	7	7
	Plant Test Codes (959 – see Note 3)	1	1
	Special 7-digit Dialling Codes (610 & 810)	2	2
	911 Misdial Codes (912, 914 & 915)	3	3
	Subtotal	**27**	**27**
C	**CO Codes assignable prior to a Jeopardy Condition (C=A-B)**	**773**	**773**
D	**CO Codes unassignable prior to a Jeopardy Condition that became assignable in a Jeopardy Condition:**		
	Future Canadian Geographic NPA Codes (Note 4)	6	6
	Current Neighbouring NPA Codes (assign CO Code 306, in the Eastern portion of NPA 204 and assign CO Code 807 in the western portion of NPA 204)	2	2
	Subtotal	**8**	**8**
E	**Assignable CO Codes in a Jeopardy Condition (E=C+D)**	**781**	**781**
F	**Assigned CO Codes as of 5 June 2009**	**621**	**621**
G	**Net CO Codes available for assignment as of 5 June 2009 without a Jeopardy Condition (G=C-F)**	**179**	**179**
H	**Net CO Codes available for assignment as of 5 June 2009 in a Jeopardy Condition (H=E-F)**	**206**	**206**

Notes:

1. The CO Code corresponding to neighbouring NPA Code 867 is already assigned in NPA 204
2. 27 CO Codes corresponding to the 34 Future Canadian Geographic NPA Codes are already assigned in NPA 204.
3. CO Code 958, a Plant Test Code in all other Canadian NPAs, was assigned and is in-service in NPA 204
4. The 7 CO Codes corresponding to the Future Canadian Geographic NPA Codes that are currently unavailable for assignment in NPA 204 are: 273, 387,431, 460, 579, 584 & 879; one of these cannot become assignable even in a Jeopardy Condition as it would correspond to the new NPA, therefore must remain unassignable as a CO Code.

13. SELECTION OF RELIEF NPA

In the event that the recommended relief option requires a new NPA Code, the criteria for selection of an appropriate area code for relief is addressed in section 4.6 of the Canadian NPA Relief Planning Guideline. The criteria that should be taken into account when Future Canadian Geographic NPAs are being considered as candidates for relief of a specific current Canadian Geographic NPA include the following:

a) The preferred Future Canadian Geographic NPA Code should not be an NPA Code that is assigned as a CO Code in the area that is being relieved (Home NPA(s)).
b) The preferred Future Canadian Geographic NPA Code should not be an NPA Code that is assigned as a CO Code in another NPA within the same province where there is a possibility that a single new NPA Code could be overlaid on more than one NPA within the province, or where a boundary realignment could occur that affects another NPA.
c) The preferred Future Canadian Geographic NPA Code should not be an NPA Code that is assigned as a CO Code in an Exchange Area in a neighbouring NPA, if the neighbouring NPA has 7-digit local calling within the NPA, and i) the Exchange Area in the neighbouring NPA where the CO Code is assigned has local calling to the NPA being relieved, or ii) the Exchange Area in the neighbouring NPA where the CO Code is assigned does not have local calling to the NPA being relieved, but other Exchange Areas within that neighbouring NPA have 7-digit local calling to the Exchange Area where the CO Code is assigned as well as local calling to the new NPA.

On the CNA web site at *http://www.cnac.ca/npa_codes/relief/overview.htm* there is an NPA Selection Tool that can assist in determining which of the NPA Codes that are currently available for assignment in Canada are most suitable for relief of an exhausting NPA.

See Annex B, Table 3 for an extract from the NPA Selection Tool that shows details of the status in NPA 204 and adjacent NPAs of CO Codes that correspond to Future Canadian Geographic NPA Codes.

CO Codes corresponding to Future Canadian Geographic NPA Codes which are not assigned in NPA 204 and therefore meet criterion a) above are 273, 387, 431, 460, 579, 584 and 879. The code 579 must be excluded as it has been reserved for the future relief of NPA 438/450/514 by Telecom Decision CRTC 2009-255, leaving 6 codes, i.e. 273, 387, 431, 460, 579, 584 and 879. Criterion b) is not applicable since Manitoba is a single NPA area. Criterion c) is met by all 6 codes because none of them are assigned as CO Codes in Creighton SK, (the only exchange in a neighbouring NPA with local calling into NPA 204), and Creighton has no local calling to any other exchanges in NPA 306. All of the codes 273, 387, 431, 460, 579, 584 and 879 are therefore equally suitable as a new NPA code for the relief of NPA 204, unless analysis of potential future code reservations for NPA reliefs in other areas of Canada, or telecom service provider cost considerations indicate a preference for one code over another for the relief of NPA 204.

Additional factors requiring consideration when recommending a specific NPA Code for NPA 204 relief are:

- 460: The NPA Code Selection Tool indicates that NPA 460 is the only NPA Code that satisfies all the criteria for future relief of NPA 807. Also Bell Canada advises that NPA 460 would be the least cost option for the future relief of NPA 226/519.

- 431: The NPA Code Selection Tool indicates that NPA 431 is the only future NPA Code for which the corresponding CO Codes are not assigned in both the Home and all Neighbouring NPAs, which could be beneficial if local calling areas were ever expanded in the future.

Based on the above information, the RPC recommends that NPA Code 431 should be assigned for the relief of NPA 204.

As the NPAs that would serve the Manitoba region under a split or overlay method (e.g., 204 and 431) would provide for a long useful life before subsequent relief would be required (i.e., greater than 20 years), the RPC does not recommend that an additional Future Canadian Geographic NPA Code be reserved at this time for subsequent relief in this region.

As one of the CO Codes corresponding to Future Canadian Geographic NPA Codes that are not assigned in NPA 204 (i.e., 273, 387, 431, 460, 579, 584 and 879) will be used for the relief of NPA 204, there would be a maximum of 6 CO Codes corresponding to Future Canadian Geographic NPA Codes that could be made available for assignment in NPA 204 to extend the life of NPA 204. For relief of neighbouring NPA 306, based on an assessment of most likely relief NPAs, one of Future Canadian Geographic NPA Codes 474, 639, 851 or 879 is most likely to be used for future relief; therefore Code 204-879 should re retained as unassignable in NPA 204 at this time. CO Codes 273, 387 and 460 are currently unassigned in Neighbouring NPAs 867 and 807, both of which are not projected to exhaust for a very long time (i.e., beyond 2030). CO Code 460 is also unassigned in all neighbouring NPAs of NPA 807. Accordingly, NPA 204 CO Codes 273, 387 and 460 should be retained as unassignable at this time. NPA 204 CO Codes 584 and 579 could be made available for assignment in NPA 204 to lengthen the life of NPA 204; however this would not appreciably increase the life of NPA 204. Accordingly, the RPC recommends that NPA 204 CO Codes 584 and 579 should be made available for assignment to extend the life of NPA 204.

14. RECOMMENDATIONS

The RPC recommends a distributed overlay of a new NPA on NPA 204 (Relief Option 5) based on the assessment of Relief Options and other issues contained in this document, including the following factors:

Factors supporting recommendations for an overlay versus a split

- Customer telephone number changes are not required, thus minimizing negative customer impacts.
- Wireless communication devices do not have to be reprogrammed and therefore customers will not be inconvenienced by having to take their sets to their service providers for reprogramming.
- Costs for TSPs would be lower with an overlay due to the avoidance of the need to reprogram wireless telephones, and lower costs for changes to back-office support and billing systems, etc.
- An overlay Relief Option does not favour customers and Carriers in one part of NPA 204 versus the other part of NPA 204, such as would occur with a split. Retaining the NPA 204 Code in one of these areas would benefit certain customers and Carriers located in that area, and changing it in the other area would seriously disadvantage the customers and Carriers located in the other area.
- Local dialling plans would be consistent throughout the province of Manitoba and the implementation of mandatory 10-digit local dialling would be consistent with recent dialling plan changes in other Canadian NPAs and with the industry-recommended adoption of the 10-digit Uniform Dialling Plan.

Based on the assessment of Relief Options and other issues contained in this document, the RPC submits the following recommendations to the CISC and CRTC:

1) The relief method should be a distributed overlay on NPA 204;

2) NPA 431 should be the Relief NPA for NPA 204;

3) The Relief Date should be XX MONTH YEAR in order to provide Carriers and customers with advanced notification and sufficient lead-time to implement relief;

4) The local dialling plan should be changed to 10 digits for all local calls originating within the NPA 204 area and the new relief NPA Code;

5) A 7- to 10-digit dialling transition period should be implemented commencing on XX MONTH YEAR and ending on YY MONTH YEAR, with network announcements on calls dialled using 7 digits phased in over one week between XX-ZZ MONTH YEAR.

6) Mandatory 10-digit local dialling should be implemented commencing on YY MONTH YEAR, with network announcements on calls dialled using 7 digits phased in over one week between YY-ZZ MONTH YEAR;

7) Standard network announcements should be implemented commencing on YY MONTH YEAR and completed within one month by ZZ MONTH YEAR;

8) Per the discussion in section 13 of this Planning Document, the RPC recommends that NPA 204 CO Codes 584 and 579 should be made available for assignment to extend the life of NPA 204.

9) Per the discussion in section 9 of this Planning Document, in situations where TSPs have network limitations in providing recorded announcements with call completion, and/or the provision of such announcements and call completion would not be cost effective (e.g., for companies serving small and/or remote locations with legacy technology, or for wireless carriers), it is recommended that such TSPs may submit written requests to CRTC staff seeking relief from the obligation of providing industry standard network announcements with automatic call completion on calls dialled using 7 digits prior to the implementation of mandatory 10-digit local dialling. In such circumstances, those TSPs seeking relief shall be required to inform their customers of the 10-digit dialling requirement by:

   a. sending monthly bill inserts (to be submitted at least one month prior to insertion to CRTC staff for approval) in each of the 4 months immediately prior to the month when mandatory 10-digit local dialling is scheduled to be implemented;
   b. placing two notices in local newspapers (if available), one during the month prior to the month when mandatory 10-digit local dialling is scheduled to be implemented, and one during the month when mandatory 10-digit local dialling is scheduled to be implemented;
   c. sending a personal letter to each affected customer, to be received 10 days prior to the implementation date of mandatory 10-digit local dialling; and
   d. placing information on the TSPs' websites in a prominent, highly visible location for the minimum period of about 5 months ending at the end of the month when mandatory 10-digit local dialling is scheduled to be implemented.

NPA 204
INITIAL PLANNING DOCUMENT

ANNEXES