

****** DRAFT *****
April 16, 2009
NPA 204 Industry Stakeholder Conference Call

Participants: Doug Birdwise – Bell Canada
Allen Trafford – MTS Allstream
Rob Bazilewich – Westman Media Cooperative
Richard Bourgon – Bell Canada
Bill Mason – CRTC
Kim Wardle – CRTC
Kevin McGouran – MTS Allstream
Deirdre Massiah-Gomes – TELUS
Stephen Lau – MTS Allstream – will e-mail with others
Olena Bilozerska – TELUS
Frank Norman – Interested Party
Mark Cucchia – Interested Party
Glenn Pilley – SAIC Canada (CNA)
Suresh Khare – SAIC Canada (CNA)
Fiona Clegg – SAIC Canada (CNA)

Welcome:

The Director, Canadian Numbering Administrator (CNA), welcomed the attendees and the participants introduced themselves. It was noted that no Relief Planning Committee has been created for NPA 204 and, therefore, only industry stakeholders have been invited to participate in this conference call.

Agenda:

It was noted that no formal agenda had been provided for today's conference call, but that this conference call is a result of a CSCN conference call that was held on April 3, 2009. During that call, the CNA was requested to convene an NPA 204 industry stakeholder conference call for current and prospective CO Code Holders to discuss the situation in NPA 204, to recommend approaches to address the volatility of the forecasts in this area and to consider Bell Canada's proposal to accelerate relief planning for this NPA by making recommendations to the CRTC regarding the relief method and new NPA Code.

January 2009 NRUF Results:

Glenn Pilley provided the 2009 G-NRUF Result for NPA 204 as follows:

NPA	Growth Average	Exhaust 2009	Exhaust 2008¹	Remarks
204	5 years	Sep-2010	Dec-2021	Need to start planning (in Jeopardy Condition)

1. As reported in 2008 Final Aggregate General results.

It was noted that there is tremendous concern with the eleven year and three month change in the Projected Exhaust Date for NPA 204 from December 2021 to September 2010.

It was noted that the CNA declared NPA 204 to be in a Jeopardy Condition on March 23, 2009.

It was noted that preliminary April 2009 J-NRUF results for NPA 204 indicate that the Projected Exhaust Date has moved out to March 2011.

Bell Canada Contribution:

During the April 3, 2009 CSCN conference call, Bell Canada volunteered to submit a contribution to the CNA containing proposals for accelerating the relief planning process prior to today's conference call. It was noted that the contribution has not yet been submitted to the CNA. It was also noted that the contribution will be submitted to the CNA by April 17, 2009 but will not address the situation in NPA 204.

Discussion:

A representative from Bell Canada expressed that company's views on NPA 204, noting that the CNA had originally determined that the Projected Exhaust Date was September 2010, which would not allow the normal relief planning process to take place.

Bell Canada noted that the industry must move very quickly to develop a Planning Document and Relief Implementation Plan for NPA 204. The two primary relief methods would be the overlay of NPA 204 with a new NPA, or an NPA split (i.e., splitting the province into two geographic NPAs). It was noted that an NPA split would require consumers in approximately half of Manitoba to obtain new telephone numbers.

It was noted that in numerous other Canadian NPA relief planning meetings the pros and cons of splits and overlays have been discussed. It was also noted that over the past seven or eight years, overlays have been the favoured relief method.

It was noted that when discussing a relief method for NPA 204, a list of issues, problems and concerns about splits should be developed but possibly without dedicating too much time to various specific split options. It was again noted that the overlay approach is preferred, but implementation of an overlay means 10-digit local dialling is required to ensure competitive equity in the industry.

Bell Canada believes a new overlay area code would be the most expedient relief option to implement in Manitoba.

It was noted that NPA 431 is the only NPA on the list of Future Canadian Geographic NPAs that satisfies the criteria for a relief area code in Manitoba.

Bell Canada suggested developing an accelerated schedule to select the NPA Code, Relief Date, and relief method to be used in NPA 204.

It was noted that the Bell Canada contribution will be sent out on Friday, and people on

this call should consider the contribution even though it does not directly address NPA 204.

It was noted that a Public Notice is expected from the Commission which will announce the formation of a CISC ad hoc Relief Planning Committee. It is anticipated that the Public Notice will also require that CO Codes be set aside for initial code assignments and initial code assignments for new entrants, which will advance the Projected Exhaust Date for NPA 204.

Glenn Pilley explained the procedure contained in the CRTC-approved Canadian NPA Relief Planning Guideline for forming an RPC, developing a Planning Document and a Relief Implementation Plan. It was noted that a copy of the current Guideline is available from <http://www.crtc.gc.ca/public/cisc/cn/CNODGL0013A.doc>.

It was noted that NPA 705 is in a similar position to NPA 204 insofar as the supply of CO Codes is not sufficient to allow for the CRTC-approved NPA relief planning process to take place. It was noted that, compared to NPA 204, NPA 705 does have an additional year of life.

It was noted that the CNA has reviewed the NPA 204 Projected Exhaust Date and the result of that review is that the date has moved out to March 2011. It was asked whether March 2011 is as far as the Projected Exhaust Date is likely to move out. In response, it was noted that, depending on the number of CO Codes set aside by the Public Notice, the Projected Exhaust Date may advance somewhat.

The CNA noted that CRTC staff was asked to discuss the forecasts from some of the carriers in NPA 204. CRTC staff has managed to speak to some of the carriers and certain carriers have decreased their forecasts slightly.

It was noted by a participant that the Canadian NPA Relief Planning Guidelines specify that several documents need to be created (i.e., the Planning Document and Relief Implementation Plan, which includes a relief implementation schedule). It was also noted that the Consumer Awareness and Network Implementation plans are carrier specific. In response, it was noted that there is a requirement to form Consumer Awareness and Network Implementation Task Forces to address common activities contained in the relief implementation schedule. In addition, it was noted that during other recent Canadian NPA relief planning activities, some form of Telecommunications Alliance had been created to address consumer awareness issues.

It was noted that the entire relief planning process is a new activity in NPA 204. It was noted that MTS Allstream needs as much time as possible to implement the new NPA. It was suggested that a document should be created, for submission to the Commission, which recommends shortcuts to the process of relief implementation in NPA 204.

In response, it was noted that in NPA 418 a similar situation occurred and relief had to be implemented faster than is contemplated by the CRTC-approved Guideline. Implementation of the new NPA in 418 was successful because consumers in that area were familiar with 10-digit local dialling and changes had already been made to carriers' networks in that region to allow 10-digit local dialling .

It was again suggested that an overlay should be considered, but was noted that there

are different kinds of overlays.

It was recommended that the NPA 204 stakeholders wait for the Bell Canada contribution for NPAs 289/905, 705 and 819, and see if any of the proposals contained therein could be applied to the situation in NPA 204.

In response to a question, it was noted that the NPA 204 Public Notice is in the process of being drafted. CRTC staff noted that the NPA Relief Planning process should be followed but can be expedited as it was in NPA 418.

It was noted by Commission staff that the Commission has already sanctioned an expedited mode of relief planning in that there is now only one Public Notice related to relief planning in a given area and no comment/reply comment stage is required. It was reiterated that the public must have a chance to participate in the relief planning process. It was noted that, if required, code rationing is a way of dealing with CO Code assignment that would slow down the exhaust of NPA 204.

It was noted that while there are other types of overlays besides a distributed overlay, the area not in a concentrated overlay must have a reasonable quantity of CO Codes from the original NPA (i.e., the area not covered by the overlay NPA). It was noted that, given the timeframe involved in NPA 204, there is not really time to implement a concentrated overlay.

It was agreed that the public and also alarm companies need to be involved in the relief planning process. It was reiterated that the stakeholders in NPA 204 would like as much assistance and time as possible to implement relief. It was noted that the stakeholders need some type of documentation to identify the required steps for implementing relief. In response, it was noted that the steps are documented in the Canadian NPA Relief Planning Guideline albeit that the steps will have to be compressed into a shorter timeframe.

It was noted that a Planning Document and Relief Implementation Plan can be developed and filed simultaneously (as was done in NPA 418), which collapses the timeframes considerably since only one Commission decision is required to approve both documents.

Concern was expressed as to the timeframe remaining prior to exhaust. It was noted that the networks in Manitoba need to be looked at and modified to enable 10-digit local dialling. Bell Canada indicated that knowing the relief method and relief NPA well in advance of the Relief Date gives carriers more time to implement relief prior to the exhaust date.

In response to a question, it was noted that some of the CO Code conservation/rationing measures may help to alleviate the situation in Manitoba, but code conservation/rationing still means carriers will not get the numbers they require. Bell Canada reiterated that they would like to know the relief method and new NPA Code.

It was noted that three or four meetings need to take place to arrive at a consensus agreement with respect to the NPA Code, relief method and relief date.

It was noted that NPA 579 is also available for assignment in Manitoba and was asked

why it has not been mentioned as a relief NPA. In response, it was noted that NPA 579 may be a more suitable relief NPA elsewhere in Canada. It was later confirmed that NPA 579 is being proposed for the next relief of NPA 450.

It was suggested that the selection of a relief NPA could be done earlier, as opposed to waiting for the actual plan to be approved by the Commission. It was suggested that the Relief Planning Committee could ask the CNA to request NPA 431 from the NANPA.

It was noted that when the Decision comes out for NPA 450, the NPA Selection Tool will need to be updated.

It was noted that there are nearly 2 years to implement relief for NPA 204 since the Projected Exhaust Date has moved out.

It was acknowledged that there is a need to minimize impacts on customers, but there is also a need to consider network changes and back-office system changes that would need to be made to the carriers' equipment and software to ensure successful implementation of a relief NPA.

Doug Birdwise reviewed how NPAs should be selected and noted that section 4.6 of the Canadian NPA Relief Planning Guideline contains three criteria for the selection of a relief NPA as follows:

The criteria that should be taken into account when Projected Future Canadian Geographic NPAs are being considered as candidates for relief of a specific current Canadian Geographic NPA include the following:

- a) The preferred Projected Future Canadian Geographic NPA should not be an NPA that is assigned as a CO Code in the area that is being relieved (Home NPA(s)). This is necessary because if the new NPA is the same as an existing CO Code in the area, normal translation methods would not allow the coexistence of 7- and 10-digit calling to that CO Code as required during a 7- to 10-digit transition period with an overlay, or the coexistence of 7-digit dialing to two different NPAs as required during a dual-dialing period with a split. In addition, the use of a new NPA that is the same as the CO Code in the existing NPA could cause customer confusion and create technical and system errors. Existing pre-relief telephone numbers in some customer databases (and possibly some TSP databases) are not updated from 7 to 10 digits when 10-digit numbers in the new NPA are added, and rely instead upon the post-relief NPA not corresponding to any CO Code within the pre-relief NPA.
- b) The preferred Projected Future Canadian Geographic NPA should not be an NPA that is assigned as a CO Code in another NPA within the same province where there is a possibility that a single new NPA could be overlaid on more than one NPA within the province, or where a boundary realignment could occur that affects another NPA. This is advisable since an overlay over more than one NPA or a boundary realignment could create the same problems as those described in a) above if the future NPA is already assigned as a CO Code in any of the affected NPAs. This criterion applies only to NPAs within the same province because it is not

expected that any such overlays and boundary realignments would cross provincial boundaries except in certain cases (e.g., the current use of NPA 902 for both Prince Edward Island and Nova Scotia).

- c) The preferred Projected Future Canadian Geographic NPA should not be an NPA 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. This is needed to avoid translation conflicts. When the combination of a Relief option and a specific potential future NPA is likely to require a change in local dialing on calls within the neighbouring NPA this should be identified in the Relief Plan.

It was noted that two-thirds of Manitoba's telecommunications customers are probably within the Winnipeg LIR. It was asked, if there were a concentrated overlay outside the Winnipeg LIR, whether 7-digit dialling could be retained in the Winnipeg LIR (i.e., this area would not have CO Codes assigned from the new NPA. CO Codes from the new NPA would only be assigned in the rest of Manitoba). It was noted that a mathematical calculation would have to be done to identify whether a concentrated overlay is a viable option. It would also have to be decided whether there would be enough remaining NPA 204 CO Codes to make a concentrated overlay possible.

In response, it was noted that all Canada's overlays to date have required implementation of 10-digit local dialling. It was noted that when the NPA 778 concentrated overlay was implemented, 10-digit local dialling was also implemented. It was also noted that too much CO Code protection would be required if 7-digit dialling were retained in the Winnipeg LIR. It was noted that 10-digit local dialling would be required from local calling areas into the Winnipeg LIR if the Winnipeg LIR retained 7-digit dialling. It was suggested that such a circumstance would create extreme customer confusion.

It was noted that the more relief options put on the table, the longer it will take to develop an NPA 204 Planning Document and Relief Implementation Plan.

It was noted that MTS Allstream has participated in relief planning before but only as a CLEC and not as an ILEC.

It was noted that since the Canadian NPA Relief Planning Guideline is approved by the Commission, the Guideline is federal law and certain steps contained within it cannot be missed. In response, it was noted that sections 4.20 and section 6.0 of the current Guideline does allow the Commission to make a change in the process but both require Commission approval, not just that of Commission staff.

It was noted that a Relief Planning Committee cannot be formed until after the Public Notice has been issued. In response to a question, it was noted that a Public Notice for NPA 204 will probably be issued within the next few weeks (e.g., early to mid-May).

It was noted that once a Public Notice has been released, a Relief Planning Committee meeting must be held. It was noted that no immediate R-NRUF is required in NPA 204 since the CNA has already sent out a J-NRUF, and will continue to do so at the requisite intervals. It was noted that with the latest J-NRUF results, the Initial Planning Document (IPD) could be developed and a Relief Planning Committee meeting could be held in mid-June to discuss the IPD. In response, it was noted that the industry needs to take the finite number of people at the CNA into account.

It was suggested that the Initial RPC meeting in Winnipeg should occur near the end of June, two conference calls in July should be scheduled, and the RPC should arrive at a quick consensus by the end of July. It was also noted that it would take until at least September for the Commission to release a decision concerning NPA 204.

It was noted that the existing different technologies and ISIT equipment need to be investigated to find out whether modification can be done or whether replacement is required. The implementation timeframe needs to take such an investigation into account. It was also noted that the chosen relief option will impact the relief date.

It was noted that for Bell Canada eighteen months is probably sufficient time to implement relief since it is acting as a CLEC in Manitoba, but this may not be sufficient time for MTS Allstream as the incumbent carrier. In addition, it was noted that it is also very important to get alarm companies on board as soon as possible.

It was noted that the CNA includes the national alarm companies on their distribution lists and requests them to notify their membership as soon as possible if 10-digit local dialling is going to be implemented in a given area. It was noted that all automatic diallers need to be programmed for 10-digit local dialling prior to implementation of a new overlay NPA.

It was noted that during relief planning in British Columbia, exceptions to certain provisions in the relief planning documentation were allowed in the far North to accommodate certain technologies (e.g., switches that were allowed to have NPA 250 CO Codes assigned only). In response, it was noted that there are six areas in the Winnipeg LIR that use satellite technology and that particular technology may not support 10-digit local dialling.

It was noted that MTS Allstream will begin investigating the capabilities of the various equipment and software in their networks and systems immediately.

Next Steps:

It was noted that an additional conference call should be held even if a Public Notice is not released by the Commission in mid-May. A conference call has been scheduled for Thursday, May 21, 2009, 14:00 to 16:00 Eastern Time. The call in number will be 1-800-366-7242 with an access code of 7091039.

The Director of the CNA thanked the attendees for their participation on today's conference call.

Summary of Agreements Reached:

None.

Summary of Action Items:

Carriers should immediately begin investigating the capabilities of the various equipment and software in networks and systems that will be impacted by NPA 204 relief.