

June 16, 2020

Mr. Claude Doucet  
Secretary General  
Canadian Radio-television and  
Telecommunications Commission  
Ottawa, ON K1A 0N2

**VIA GC KEY**

Dear Mr. Doucet:

Re: CRTC file: 8665-C12-202000280 - Unauthorized Mobile Telephone Number Porting in Canada

1. The Canadian Wireless Telecommunications Association (CWTA) is in receipt of the Canadian Radio-television and Telecommunications Commission's (CRTC) request for additional information dated May 28, 2020 related to Unauthorized Mobile Telephone Number Porting in Canada. Below are responses to questions directed to CWTA.
2. CWTA requests that the Commission treat certain information contained in the responses below as confidential. The identified responses are filed in confidence pursuant to section 39 of the Telecommunications Act, sections 30-34 of the Rules of Practice and Procedure and section 20 of the Access to Information Act. CWTA and WNP Council members would never publicly disclose details of steps the industry is taking or contemplating taking to prevent unauthorized ports and SIM-swaps other than to the Commission. The information submitted contains detailed fraud prevention measures, and its release would enable fraudsters to better understand the measures implemented by the industry to protect Canadian consumers from fraud, thus circumvent these measures and expose consumers to further harm. CWTA submits that any possible public interest in disclosure of this Information is greatly outweighed by the specific direct harm that would flow to Canadians and the WNP Council members.

**Question 11: CWTA, referring to paragraph 41 of your 14 February 2020 response in which you identified an interim measure that was taken, to provide additional details on the interim measure in question including how and when customers are made aware, as well as the information provided to the customer, whether a charge is applied, and whether the interim measure is intended as a short-term measure and the possibility of extending this interim measure indefinitely.**

3. CWTA requests that the Commission treat certain information contained in this response as confidential for the previously identified reasons.
4. Port protection refers to a functionality that may be used by the OSP, which is applied to a telephone number (TN), to block a Port Request. There is no charge to the customer for applying this functionality.

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5. As noted in our February 14<sup>th</sup> response, Port Protection can be applied to a wireless TN, under very specific circumstances that are identified below. (The original scope of Port Protection was limited to the first bullet.)
- accounts where public protection or safety may be at risk as a result of an unauthorized port or service cancellation. This includes police, fire, ambulance and emergency management organizations, or where required by law, statute or court order;
  - accounts that have been previously subjected to fraudulent activity or an unauthorized port, where the account holder gives consent to implement port protection on one or several wireless numbers related to their account; or
  - accounts where the account holder proactively requests port protection on one or several wireless numbers related to their account, usually in circumstances where the customer has had personal information breached.
6. # [REDACTED] #
7. # [REDACTED] #
8. # [REDACTED] #

**Question 12: CWTA and each mobile carrier, to provide a description of discussions held or plans developed with other organizations, such as financial institutions and social media and others, to address the issue of fraudulent activity involving unauthorized customer transfers (ports) and SIM swapping in Canada.**

9. At present, all CWTA activities related to addressing fraudulent porting activity have been focused on the changes that are necessary to implement the required solution. Industry activity has been focused on identifying where the fraud is occurring, understanding where gaps might exist, and tightening systems and processes to minimize abuse in the interim.
10. It should be understood that other organizations, such as those identified above, have their own security and fraud mechanisms in place, and it is not clear what plans, if any, could be implemented with other organizations to separate valid activity from fraudulent activity. The vast majority of activity is valid activity and fraudulent activity is only identified after-the-fact.
11. Once the new processes are implemented, CWTA expects that there will be key stakeholders (i.e. CRTC, CCTS, OPC, etc.) with which it will communicate concerning the changes. This communication will continue to safeguard the specifics of the solution.

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**Question 13: CWTA, referring to paragraphs 46 to 55 of your 14 February 2020 letter where you discussed an enhanced wireless number portability process, to provide an update on the implementation of such enhanced process and an updated timeframe for each wireless service provider to implement it.**

12. CWTA requests that the Commission treat certain information contained in this response as confidential for the previously identified reasons.

13. # [REDACTED]  
#

14. # [REDACTED]  
#

15. # [REDACTED]  
#

**Question 14: CWTA and each mobile carrier, to comment on any impact of the Covid-19 pandemic on the industry's implementation of measures to counter unauthorized customer transfers (ports) and SIM swapping as described in the CWTA's 14 February 2020 letter or in response to this letter.**

16. Covid-19 has made a marked impression across the country, and across the industry. Carriers continue to play a vital role in enabling Canadians to stay in touch with loved ones, sustain economic activity and receive critical services. Carrier work to ensure Canadians can continue to rely on high-quality networks and services to which they are accustomed has occurred in parallel with internal activities to deal with operational challenges across their own organizations, including impacts to resources and projects, in parallel.

17. Despite the challenges of the past few months, we've continued to work diligently to ensure that the identified schedule has not been materially impacted. Work on a carrier and industry-level concerning the enhanced validation process has remained on track.

**Conclusion:**

18. The industry has invested considerable time, effort, and resources into building a solution to address the issue of WNP fraud.

19. As fraudsters' methods evolve, so do the efforts of the wireless industry. CWTA and the members of the WNP Council will continue to work collaboratively to protect Canadian consumers as issues become known.

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