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August 25, 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. CWTA is in receipt of the Commission's request for information dated August 20, 2020 and its subsequent letter dated August 24, 2020 regarding a request for immediate action directing the members of the WNP Council to delay introducing or relaunching the enhanced mobile number porting process ("Enhanced Process").
2. In its August 20, 2020 request for information, the Commission asked CWTA and WNP Council members several questions concerning the roll-back of the Enhanced Process that was described in paragraphs 46 to 55 of our February 14, 2020 letter. In this letter CWTA responds to Question 2 on behalf of WNP Council members. WNP Council members will each separately file responses to the remaining questions posed by the Commission.
3. In its letter of August 24, 2020, the Commission poses three (3) questions to CWTA, WNP Council members, and any interested party for response by August 25, 2020, as well as five (5) additional questions to CWTA and WNP Council members for response by August 28, 2020. As each WNP Council member has its own perspective and carrier-specific data in response to such questions, CWTA respectfully defers to the responses made by individual WNP Council members in response to the Commission's letter of August 24, 2020.

Question #2 to August 20, 2020 RFI: In the CWTA's 12 August letter, it was indicated that the decision to temporarily roll-back the implementation of the Enhanced Process was the result of issues encountered after initial implementation and that these issues were related to the manner in which individual service providers implemented the Enhanced Process into their respective business processes and internal systems. Describe in detail the issues encountered as well as the specific causes of any such issues.

4. As communicated to the Commission in CWTA's update letter of August 12th, prior to its roll-back the Enhanced Process was fulfilling its intended purpose of blocking fraudulent ports. However, in the course of implementing the solution across a subset of WNP Council members it became clear that the

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implementation had unexpected impacts on some legitimate number porting requests. As a result, a decision was made by WNP Council members who had implemented the Enhanced Process to temporarily roll-back their use of the solution so that the issues could be studied and remediation could be planned and implemented.

Issues Encountered:

5. Attached as Appendix A to this letter is an aggregate list of issues identified by WNP Council Members.
6. We reiterate that the aforementioned issues do not relate to the Enhanced Process' ability to block fraudulent ports. The initial use of the Enhanced Process proved to be successful in this regard. CWTA and WNP Council members also have confidence in their ability to resolve those issues that require remediation so as to ensure that legitimate number porting requests are not materially impacted.

Sincerely,

[Original Signed by Eric Smith]

Eric Smith
Senior Vice-President

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