

July 24, 2025

Reference: [8698-J92-202503367](#)

Mr. Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
1 Promenade du Portage
Ottawa, ON K1A 0N2

Filed by Intervention Comment Form

Dear Mr. Morin:

RE: Procedural request - Part 1 application to delay the implementation of thousand-block pooling for small Telecommunications Service Providers

1. The Canadian Telecommunications Association (“CTA”) is in receipt of the Independent Telecommunications Providers Association’s (“ITPA”) procedural letter, filed 27 June 2025 on behalf of its members, in which they ask the Commission to delay the implementation of thousand-block pooling (“TBP”) for small Telecommunications Service Providers (“SNP-TSP”) until October 2026.
2. In their intervention ITPA identifies several unresolved issues which impact its members’ ability to meet the current implementation date. Further they suggest that once TBP is implemented by larger carriers, and all relevant standards and processes are in place and tested/verified, that SNP-TSP implement TBP in a staggered approach to minimize impacts on them.
3. The CTA is an industry association dedicated to building a better future for Canadians through connectivity. Our members include service providers, equipment manufacturers, and other organizations in the telecommunications ecosystem, that invest in, build, maintain and operate Canada’s world-class telecommunications networks. Through our advocacy initiatives, research, and events, we work to promote the importance of telecommunications to Canada’s economic growth and social development, and advocate for policies that foster investment, innovation, and positive outcomes for consumers.
4. The following comments are being submitted on behalf of CTA’s member telecommunication service providers (“TSPs”).

5. Failure to address specific issues identified within the ITPA intervention should not be construed as our agreement with any opinions expressed. In addition, to the extent that any comments in this intervention conflict with a comment of a TSP, the comment of the TSP shall prevail with respect to that TSP.

Support for extension

6. In its review of the intervention, CTA agrees with many of the items identified by ITPA in relation to the overall current state of implementation activities, and the breadth of work still to be done. As such, CTA submits that an extension of the deadline to October 2026 is not only warranted but also necessary and should be granted to all TSPs regardless of size.

Industry preparedness, including ability to test

7. The implementation of thousand-block pooling is a complex undertaking, touching multiple systems that are both internal and external to TSPs.
8. The items identified at paragraph 10 by ITPA as having an impact on SNP-TSPs impact all TSPs. Without a finalized set of processes and requirements, any work currently underway will need to be re-assessed against the final deliverables. This adds a layer of unnecessary risk, and additional strain on resources. **[Emphasis added.]**

“The latest quarterly implementation report by the CSCN, dated 20 June 2025, which is still in draft form, highlights **a number of important outstanding items related to TBP**. The draft report indicates that **the CSCN is in the process of finalizing a TBP checklist and indicates that many other issues remain unfinalized**. Until these issues are resolved, **the software specifications required to implement TBP in TSP networks will continue to change**. Feedback from ITPA member companies indicates that **switch vendors are unable to implement TBP for SNP-TSPs at this point given that the processes and requirements for TBP in Canada are not fully formalized and documented.**”

9. Each of these issues is a significant problem on its own and, when combined, are potentially catastrophic to the intended outcome.
10. Testing of TSP networks and systems – both intra and inter – will be an important element to complete in advance of TBP launch. It is only in exercising the relevant systems that a TSP will understand if all elements of its solution have been implemented correctly and identify any issues that require remediation.

At this point testing has only just begun and for a limited number of TSPs. As noted by ITPA at paragraph 14 and 15 [**emphasis added**]:

“The ITPA agrees that **testing is vital to the smooth roll-out of TBP**. Its members have surveyed their operating territories to identify potential testing partners but have, to date, been unable to establish testing arrangements with potential partners. The testing exchanges arranged by the CSCN (i.e. Halifax, Montreal, Regina, Rimouski, Ste-Victoire, Toronto, and Vancouver)⁴ are, in most cases, not helpful since ITPA members have no CO codes in use in large metropolitan exchanges, nor do they have any plans to use codes there.”

“ITPA members have **no gauge as to how complex or time consuming the testing process will be since accepted industry processes have not been completed or standardized**. The result of this situation is that ITPA members are not currently able to test TBP, further increasing the difficulty of complying with the Commission’s existing deadline.”

11. TSPs must successfully complete testing as a pre-requisite to launching TBP.

Discussions and planning across multiple forums

12. A significant amount of work has occurred since the release of **Telecom Regulatory Policy CRTC 2024-26, Implementing thousand-block pooling**. Time and effort has been invested by TSPs, both individually and collectively, as well as by other impacted stakeholders. This work has been done in good faith, and with an emphasis to minimize negative outcomes.
13. The magnitude of this project, coupled with its cross-industry impacts, has resulted in discussions concerning its implementation taking place in numerous forums. While this is necessary to identify and address the various elements that require action, it has also resulted in a fragmented understanding of these elements and a lack of ability to action next steps. As noted by ITPA, a check list has been developed to mitigate some of this, but it has not been finalized.
14. Further, it is not clear that all impacted TSPs have been taking part in the multiple discussions which has resulted in a potential for significant gaps that will impact the roll out of TBP.
15. As ITPA points out [**emphasis added**]:

“The ITPA and **a limited number of its members have been only peripherally engaged with this process due to the time commitment involved with the many conference calls, competing regulatory priorities, and because they do not have the in-house technical expertise required to contribute to, or influence, these very technical discussions**. The

lists of contributions and documents generated by this process is substantial and is indicative of the human and technical resources that have been required by the largest service providers to weigh options and proposals.”

16. From a practical perspective, implementing TBP is an ‘all in’ activity in that it requires **all** TSPs in an exchange to be ready at the same time to ensure that the integrity of call routing is maintained. Successful routing requires that each TSP:
 - ensures that industry reference databases with block-level routing are populated and synchronized;
 - updates its internal translations, and interrelated systems so that the new thousand-block is properly assigned (i.e. to the block assignee, not to the original code holder); and
 - ensure each switch is able to query the NPAC or relevant network database for the LRN associated with the pooled block.
17. Simply put, many TSPs may not be aware of the relevant work underway and may not have the resources and ability to take the necessary actions to be ready for launch. This is a problem that needs to be addressed because each TSP – regardless of its size – is a potential point of failure if systems are not updated properly.

Consumer impacts

18. Issues with call routing do not only impact TSPs, they also impact Canadians.
19. When a TSP is not ready to implement TBP, it will impact their internal systems and processes and the way that they are able to interact with traffic from other TSPs. Calls will be misrouted, or fail, and the impacts will be felt acutely by consumers.
20. This can result in increased frustration and confusion for customers when they cannot reach a desired person or business, or in the event they want to move their services to another TSP via porting. It can also result in greater consequences if the calls are to emergency services and cannot be routed or fail, eroding confidence in a system that requires trust.
21. Canadian consumers have an expectation that their telecommunication services will work as expected when they require them to. That confidence can only be maintained when the call routing regime is maintained. All TSPs and impacted stakeholders play a role in ensuring the integrity of the system and, as such, must move forward as a collective.

Proposed Solution

22. CTA does not have an opinion regarding ITPA's proposed implementation plan but would note that a careful review will be necessary to ensure that any proposed approach does not negatively impact other TSPs and ensures the level of service that consumers expect.

Conclusion

23. As articulated by ITPA in their submission, there is still a substantial amount of work that needs to be undertaken, and this impacts the ability of TSPs to launch TBP by the current October 2025 deadline.
24. Ensuring that call routing is not impacted is critical. Until all of the outstanding issues are identified and resolved, there is a significant risk in the delivery of a functioning solution. There is additional risk if the solution is not properly tested in advance of implementation.
25. All TSPs must be brought into current discussions and work collaboratively so that impacts are minimized for the industry as a whole, and that TBP continues to support a fully functioning telecom system for consumers.
26. To that end, CTA reiterates its support for an industry-wide deadline extension to ensure an efficient and effective launch of TBP.
27. CTA appreciates the opportunity to provide its comments in relation to this procedural request.

Kind regards,



Ursula Grant
VP, Industry and Consumer Affairs

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