

May 19, 2026

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

Filed by Intervention Comment Form

Dear Mr. Morin:

Re: CRTC File #1011-NOC2026-0061 – Telecom Notice of Consultation *CRTC 2026-61, Call for comments – Strengthening numbering usage management practices*

1. Pursuant to the procedure outlined in Telecom Notice of Consultation 2026-61 (“TNC 2026-61”), the Canadian Telecommunications Association (“CTA”) provides its initial comments on behalf of its member telecommunication service providers (“TSPs”).¹
2. 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.
3. Failure to address any issue should not be construed as our agreement with any assertions made, or preliminary positions taken in the TNC 2026-61. In addition, to the extent that any comments in this intervention conflict with a comment of a CTA member, the comment of the member shall prevail with respect to that member.

¹ These comments have been reviewed by Bell, Cogeco, Eastlink, Rogers, SaskTel, Tbaytel, and Videotron, and are submitted on their behalf.

Introduction and Background

4. The present consultation arises from a series of regulatory developments concerning the management and preservation of Canadian telephone numbering resources. Telephone numbers (“TNs”) are a finite resource critical to Canada’s modern communications system, and increased demand from mobile telephony, voice over Internet Protocol (“VoIP”), and Internet of Things (“IoT”) applications has led to concerns about the potential exhaust of geographic numbering resources.
5. In Telecom Regulatory Policy CRTC 2024-26, the Commission introduced thousand-block pooling (“TBP”) as a measure to preserve telephone numbering resources by assigning numbers to carriers in blocks of 1,000 rather than 10,000. The Commission also directed local exchange carriers and wireless carriers to implement TBP and introduced several measures to shift the industry’s focus towards number preservation, including requirements that geographic numbers be used only where truly required and that increased scrutiny be applied to requests for numbers.
6. Subsequently, in Telecom Decision CRTC 2025-252, the Commission approved recommendations from the Canadian Steering Committee on Numbering (“CSCN”) consensus report CNRE144B to strengthen the number assignment guidelines. These recommendations included introducing number usage reporting requirements for carriers when forecasting or requesting new numbers, and increasing the frequency and granularity of forecasting exercises. The Commission also approved a 75% utilization threshold for carriers to qualify for additional numbering resources, modeled on practices in the United States. However, the Commission noted that these measures do not adequately incentivize carriers to obtain usage reports from their wholesale and third-party customers.
7. As a result, the Commission indicated in Telecom Decision 2025-252 that it intended to launch a notice of consultation to examine whether and how it should leverage its authority under the *Telecommunications Act*, SC 1993, c 38 to impose conditions on carriers, or their wholesale and third-party customers, to ensure all numbers assigned by the Canadian Numbering Administrator (“CNA”), including those that are resold, are “effectively accounted for.”² TNC 2026-61 is that consultation.

² Telecom Decision CRTC 2025-252, *CISC Canadian Steering Committee on Numbering – Consensus report CNRE144B – Recommendations to strengthen the number assignment guidelines*, 26 September 2025, at para 54 [TD 2025-252].

8. Significantly, since the original concerns about numbering resource exhaust were raised, the environment has shifted materially. The CNA has secured a new area code for Canada from the North American Numbering Plan Administrator, with an option to obtain additional codes as needed. As a result, numbering resources are now expected to continue to be available in every geographic region in Canada for at least another 10 years, substantially mitigating the urgency that existed when CNRE144B was developed. Moreover, thousand-block pooling is in the process of being implemented and will address many of the concerns that originally motivated enhanced reporting discussions.
9. Based on discussions with our members, we are concerned that the present proceeding may result in reporting obligations that do not further the public interest and instead burden the industry with unnecessary red tape. For the reasons below, we respectfully request that the industry be tasked to report on the delineation between “legitimate” and “illegitimate” and “efficient” or “inefficient” use of numbering resources.

Request to Pause the Consultation Process and Refer the Matter to CSCN CISC for Comprehensive Policy Development

10. CTA respectfully submits that the Commission should pause this consultation and direct the CSCN to develop a comprehensive report examining the policy, operational, and enforcement issues at stake. This collaborative approach is warranted for several compelling reasons.
11. First, the TNC 2026-61 raises fundamental questions about the permissible and impermissible uses of Canadian numbering resources—questions that have never been systematically addressed by the Commission and that carry significant implications for industry participants, enforcement, and the integrity of the numbering system.
12. Second, the CISC process would allow stakeholders and the Commission to properly scope the concerns that precipitated this consultation, identify the specific harms the Commission seeks to remedy, and develop targeted, evidence-based solutions proportionate to those harms.

13. Third, it will avoid the development of potentially onerous reporting mechanisms which may not result in a meaningful benefit to the numbering ecosystem in the absence of necessary guidance to help develop an effective reporting mechanism that can be used to help identify inefficient number usage.
14. CTA further notes in this respect that discussions with its members have raised significant concerns regarding the lack of conceptual and definitional clarity within TNC 2026-61. The fundamental question remains unanswered: what specific problem is this proposed reporting regime intended to solve, and what evidence establishes that the contemplated measures are necessary and appropriately calibrated to address it?

The Need for Clarification on Legitimate and Illegitimate Uses of Numbering Resources

15. The Commission identifies multiple objectives within the current proceeding:

*“In Telecom Decision 2025-252, the Commission approved recommendations made by the Canadian Steering Committee on Numbering in consensus report CNRE144B. This included a recommendation to introduce number usage reporting requirements for Canadian telecommunications service providers (TSPs) that obtain new numbers directly from the CNA. In its decision, the Commission also signalled its intention to launch a notice of consultation to examine whether and how it should leverage its authority under the Telecommunications Act **to impose conditions on these TSPs, or their wholesale and third-party customers, to ensure all numbers, including those that are resold, are effectively accounted for.***

*Accordingly, the Commission is seeking comments on potential new measures **to improve the management of telephone numbers and increase accountability for their use, particularly with respect to resold telephone numbers.** In doing so, the Commission seeks to conserve the supply of telephone numbers that support Canada’s modern communications system, while ensuring that any new requirements are as streamlined and efficient as possible to minimize the administrative burden on TSPs and other stakeholders.”³ [emphasis added]*

³ See Summary: Telecom Notice of Consultation CRTC 2026-61, *Call for comments – Strengthening numbering usage management practices*, 2 April 2026.

16. At the heart of the Commission's consultation lies a threshold policy question that has yet to be addressed: what constitutes a legitimate versus an illegitimate use of Canadian numbering resources? Without authoritative guidance on this foundational distinction, the industry lacks a clear framework for compliance, and the Commission lacks a principled basis for enforcement. This regulatory uncertainty creates several significant harms.
17. First, telecommunications service providers ("TSPs") and third parties operating in good faith cannot reliably assess whether their business practices comply with Commission expectations when the boundaries of permissible conduct have not been defined. TNC 206-61 contemplates far-reaching reporting requirements and potential enforcement measures, yet stakeholders have no authoritative standard against which to measure their own conduct or that of their counterparties. This ambiguity creates legal and operational risk for market participants and undermines the predictability that is essential to investment and innovation in the telecommunications sector.
18. Second, the absence of clear definitions impedes effective enforcement. If the Commission's objective is to address "bad actors" or misuse of numbering resources, the terms "misuse," "illegitimate use," and "bad actor" must be defined with sufficient precision to support consistent regulatory action. Enforcement without clear standards risks arbitrary application and invites legal challenge, while simultaneously failing to provide the deterrent effect that clear rules would achieve.
19. Third, the design of any reporting regime necessarily depends on understanding what information is needed and for what regulatory purpose. As discussed below, the consultation contemplates collecting data to ensure numbers are "effectively accounted for," but this concept remains undefined. Whether the Commission seeks to track the current holder of each number, verify that numbers are deployed on Canadian networks, identify numbers that have been stranded or lost, or detect specific types of misuse will fundamentally shape the information that must be collected, by whom, and at what cost. Proceeding to develop a reporting architecture without first resolving these definitional questions puts the cart before the horse.
20. CTA therefore urges the Commission to use the CISC process to develop clear, consensus-based definitions of legitimate and illegitimate uses of numbering resources before imposing new reporting obligations or enforcement mechanisms. This approach is consistent with the Commission's longstanding practice of relying on CISC to develop technical and operational standards through collaborative industry

engagement, and would ensure that any resulting regulatory framework is grounded in a shared understanding of the conduct it seeks to address.

The Concept of “Effectively Accounted For” Requires Definition

21. TSPs have a vested interest in ensuring that numbers are properly managed for long-term sustainability, and that all actors are accountable and adhere to rules outlining the legitimate use of these finite resources.
22. There is general support for the notion that third parties should be held accountable for the TNs that they lease, including identifying and reporting this information as determined.
23. However, TNC 2026-61 provides little clarity as to the specific problem the Commission seeks to solve or how the contemplated reporting regime would address it. Without properly defining the regulatory objective, it is impossible to design an effective solution. For example, the notion that numbers should be “effectively accounted for” cannot be operationalized without first defining what this standard means in practice. If the objective is simply to identify which TSP or third party currently holds particular numbers, that requires a very different data collection approach than determining whether those numbers have been activated on a network, or whether they are being used for purposes the Commission considers legitimate.
24. Moreover, if “effectively accounting for” numbers is intended to support identification of illegitimate uses, this requires a robust policy discussion to define which uses are permissible and which are not—a discussion that has not yet occurred and which can be focused through prior CISC discussions. Finally, any accountability framework must address how compliance will be monitored and what consequences will flow from identified violations, matters that require careful deliberation before a reporting regime can be meaningfully designed.

Number Exhaust Concerns Have Diminished, Reducing the Urgency for Immediate Regulatory Action

25. The Commission identifies that TNs are a finite resource that are assigned to TSPs directly by the CNA. TSPs are also able to resell these resources to third parties that provide services or further resell the TNs. In Telecom Decision 2025-252, the Commission approved new reporting requirements for assignees, including the introduction of number usage reporting when forecasting or requesting new numbers, and a 75% utilization threshold to qualify for additional resources.⁴ However, these requirements apply only to carriers that obtain numbering resources directly from the CNA—they do not apply to third parties. Similarly, there remains no restriction on how many times a TN can be transferred before it is activated on a network. These limitations impact the CNA’s ability to obtain a complete picture of numbering resource usage, which the current consultation seeks to address.
26. CTA notes that consensus report CNRE144B was filed in 2024, and since that time the environment relating to numbering resource availability has shifted materially. The implementation of TBP has addressed many of the concerns that originally motivated enhanced reporting discussions, and the full benefits of TBP are still to be realized as implementation proceeds following the July 2026 deadline. Moreover, NANPA has provided Canada an additional NPA upon request and it is our understanding that NANPA has indicated that further NPAs would be available upon request should any more be required, such that Canada no longer faces a 2029 numbering exhaust date as had been reported in the lead up to Telecom Regulatory Policy CRTC 2024-26, Implementing Thousand-Block Pooling.
27. The Commission itself has confirmed within Telecom Decision 2025-321, Modification of deadline for thousand-block pooling that the potential impacts have been mitigated:
- “5. Following the issuance of the Policy, the Canadian Numbering Administrator (CNA) secured a new area code for Canada from the North American Numbering Plan Administrator, with an option to obtain additional codes as needed.”
- “6. As a result, the most recent industry forecast indicated that numbering resources are now expected to continue to be available in every geographic region in Canada for at least another 10 years.”⁵

⁴ TD 2025-252 at para 20.

⁵ Telecom Decision CRTC 2025-321, *Modification of deadline for thousand-block pooling*, 28 November 2025 at paras 5-6.

28. Accordingly, the urgency that may have existed in 2024 when CNRE144B was developed has been substantially mitigated by subsequent regulatory and industry developments. This changed landscape supports taking the time to properly scope the issues through CISC rather than proceeding with a potentially overbroad reporting regime whose necessity is no longer clear.

The Proposed Reporting Regime Is Inconsistent with Red Tape Reduction Principles

29. TNC 2026-61 effectively asks respondents to design a comprehensive data collection and reporting regime for implementation across the industry—by TSPs, third parties, the CNA, and potentially the Commission itself. Such an undertaking carries significant implications for regulatory burden and industry resources.
30. The resource allocation this will require across the industry—in terms of personnel, systems development, ongoing compliance costs, and opportunity costs—is substantial. Before incurring these costs, the Commission and stakeholders should have confidence that the proposed measures are necessary to address a clearly defined problem and that less burdensome alternatives have been considered and found inadequate.
31. The consultation questions further indicate that some of the proposed measures would result in disproportionate and inappropriate regulatory burdens on TSPs, such as:
- a. requiring TSPs to report on information which they do not have;
 - b. requiring TSPs to be responsible for other entities they have no control over;
 - c. adding new reporting requirements on top of existing numbering reports (e.g. the annual NXX utilization reports and the new reporting requirements from Telecom Decision 2025-252);
 - d. re-opening existing contracts to further negotiation through mandating the addition of new clauses; and
 - e. potentially increasing CNA's administrative costs, which are ultimately borne by TSPs.
32. A more collaborative approach through CISC would allow for proper scoping of the issues at hand and development of solutions grounded in operational practicality and regulatory efficiency. The CISC process is well-suited to identifying the minimum

necessary interventions to achieve the Commission's legitimate objectives while avoiding unnecessary compliance burdens.

33. If the Commission's primary concern is addressing bad actors who misuse numbering resources, regulatory efforts should be focused on that specific objective rather than imposing broad reporting obligations on all market participants. The Commission possesses existing enforcement tools that may be deployed against identified bad actors, and a targeted approach would be more consistent with principles of proportionality and red-tape reduction than a comprehensive new reporting regime whose relationship to the underlying concern remains unclear.

Responses to TNC 2026-61 Questions

Reporting requirements regarding numbering usage by third parties

Q1. Should the Commission require that usage data for Canadian telephone numbers obtained by third parties be reported to the CNA? If so, what information should be reported?

Q2. If the Commission were to establish such a reporting requirement, to whom, how, and under what circumstances should it apply, and when should it come into effect? For example, would it be reasonable and appropriate for the Commission to:

- (a) require all assignees, as a condition of providing telecommunications services, to include in their agreements with third parties to whom they have resold Canadian telephone numbers a clause requiring the provision of usage data to the assignees for those numbers;***
- (b) require all third parties to report usage data to the assignee or third party from which they obtained the numbers;***
- (c) require all third parties to report usage data directly to the CNA or the Commission;***
or
- (d) implement a combination of the above or an alternative reporting mechanism?***

Q3. How could the Commission effectively monitor and enforce compliance with reporting requirements?

Q4. What remedies would be appropriate in cases of non-compliance, and to whom should they apply (for example, the third party obtaining the numbers, the assignee, the third party providing the numbers)?

Q5. What changes, if any, would be required to the Canadian numbering guidelines to support the implementation of such a reporting requirement?

Q6. What new enforcement powers or tools, if any, would be appropriate for the CNA to use to support the implementation of such a reporting requirement?

Q7. Should a public registry be established listing all assignees and third parties, similar to the CNA's Central Office Code Status spreadsheet? If so, who would be best positioned to develop, maintain, and publish that registry, and what information should it include?

34. As noted in the earlier section of this intervention, until clear definitions are developed, and issues that require resolution are articulated and better understood, there is not enough information to provide a meaningful response to these questions.

35. CTA reserves the right to provide comments, as appropriate or necessary, on interventions filed by other stakeholders in relation to Questions 1-7.

Limitations on third-party access to Canadian telephone numbers based on the provision of telecommunications services

Q8. Should the Commission establish limitations whereby a third party can only obtain Canadian telephone numbers if they provide telecommunications services to Canadian endusers?⁵ If so:

- (a) What specific approval criteria should third parties meet to obtain Canadian telephone numbers (for example, registration with the Commission as a TSP or provision of a specific or minimal combination of services)?***
- (b) What threshold, if any, should be established to ensure that a third party uses the majority of numbers obtained to provide telecommunications services to end-users, recognizing that some third parties obtain telephone numbers both to provide telecommunications services to end-users and to resell numbers to other third parties?***
- (c) What considerations, if any, should be given to third parties who currently hold telephone numbers but do not offer telecommunications services to Canadian end-users?***
- (d) How could the Commission effectively monitor and enforce compliance with such limitations?***
- (e) What remedies would be appropriate in cases of non-compliance, and to whom should the remedies apply (for example, the third party obtaining numbers or the assignee or third party providing the numbers)?***
- (f) What changes, if any, would be required to the Canadian numbering guidelines to support the implementation of these limitations?***

(g) What new enforcement authority or tools, if any, would be appropriate for the CNA to use to support the implementation of these limitations?

36. As noted in the earlier section of this intervention, until clear definitions are developed, and issues that require resolution are articulated and better understood, there is not enough information to provide a meaningful response to these questions.

37. CTA reserves the right to provide comments, as appropriate or necessary, on interventions filed by other stakeholders in relation to Question 8.

Limitations on the reselling of telephone numbers

Q9. Should the Commission establish a limit on the number of times a telephone number may be resold before it is activated? If so:

(a) How many times should a number be permitted to be resold?

(b) What types of transactions should count towards the resale limits (for example, resale between assignees, resale from an assignee to a third party, resale between third parties)? How could the Commission effectively monitor the resale of numbers?

(c) How could the Commission effectively monitor and enforce compliance with such limitations? What remedies would be appropriate in cases of non-compliance?

(d) What changes, if any, would be required to the Canadian numbering guidelines to support the implementation of these limitations?

(e) What new enforcement authority or tools, if any, would be appropriate for the CNA to use to support the implementation of these limitations?

38. As noted in the earlier section of this intervention, until clear definitions are developed, and issues that require resolution are articulated and better understood, there is not enough information to provide a meaningful response to these questions.

39. CTA reserves the right to provide comments, as appropriate or necessary, on interventions filed by other stakeholders in relation to Question 9.

Red tape reduction

Q10. How should the Commission balance the urgency and importance of strengthening management and accounting practices for resold numbers with efforts to reduce regulatory burden when developing any new measures? In your response, please identify (i) which measures you consider most essential, (ii) which could be streamlined

or avoided, and (iii) how the Commission could achieve meaningful improvements in numbering oversight while ensuring any new requirements remain efficient, proportionate, and practicable.

40. As identified earlier within this submission, the reporting regime is inconsistent with red tape reduction principles.

41. CTA reserves the right to provide comments, as appropriate or necessary, on interventions filed by other stakeholders.

Conclusion

42. CTA respectfully submits that the Commission should pause this consultation and direct the CSCN to develop a comprehensive report examining the policy, operational, and enforcement issues at stake.

43. Until clear definitions are developed, and issues that require resolution are articulated and better understood, there is not enough information to provide a meaningful response to this consultation.

44. CTA appreciates the opportunity to provide its views.

Kind regards,



Ursula Grant,
VP Industry and Consumer Affairs

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