

June 3, 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 – CTA Reply Comments*

1. The Canadian Telecommunications Association (“CTA”) provides its reply comments on behalf of its member telecommunication service providers (“TSPs”).¹
2. Failure to specifically address any issue or comments made by other intervenors 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.
3. As noted in our original submission, the present consultation arises from a series of regulatory developments concerning the management and preservation of Canadian telephone numbering resources primarily related to concerns about the exhaust of geographic numbering resources.
4. Measures have since been implemented to mitigate this concern, including the introduction of thousand block pooling,² and activities to strengthen numbering

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

² Telecom Regulatory Policy CRTC 2024-26 introduced thousand-block pooling (“TBP”).

guidelines and WSP forecasting and reporting requirements.³ Further, the Canadian Number Administrator (“CNA”) has secured a new area code for Canada from the North American Numbering Plan Administrator (“NANPA”), with an option to obtain additional Numbering Plan Area (“NPA”) codes as needed.

5. The 2030 date that has previously been considered by the Commission and referred to by certain parties in the present proceeding,⁴ does not reflect the true exhaust date for Canada. Rather, it reflected the potential date for exhaust for particular NPA-complexes and the requirement for Canada to reach out to NANPA for more NPAs. Such requests are not surprising (and, in fact, are expected) as Canada and other states and countries managed by NANPA cannot request NPAs to address their projected exhaust further out than ten years.⁵ Based on NANPA’s own reporting, numbering resources will be available in every geographic region in Canada for decades. NANPA’s latest annual report, which includes demand and projections for Canada, does not project exhaust for the NPAs and CO Codes it manages before 2060 and, under a stress test that assumes 20% more than projected demand, exhaust in 2052.⁶ Conversely, a sensitivity analysis that assumes a 12.5% decrease in annual demand for new CO codes results in a projected exhaust date of 2065.⁷ While the Commission should consider approaches that promote efficient use of number resources such that annual demand for new CO Codes continues to decline, there is time for the Commission and all impacted service providers to take a step back and evaluate practical next steps in this over-arching discussion.
6. In the context of this proceeding, the management of numbering resources is an important topic that impacts a broad range of service providers in multiple ways, and the development of the proposed solution will have further significant impacts on all stakeholders including the CNA and the Commission itself.

³ Telecom Decision CRTC 2025-252 approved recommendations from the Canadian Steering Committee on Numbering (“CSCN”) consensus report CNRE144B to strengthen the number assignment guidelines. Number usage reporting requirements for carriers when forecasting or requesting new numbers, and increasing the frequency and granularity of forecasting exercises, were also introduced.

⁴ See Telus Intervention, paragraph 9, referring to TRP 2024-26.

⁵ See section 5.1 Canadian NPA Allocation Plan and Assignment Guideline, Version 1.0, 10 April 2026.

⁶ North American Numbering Plan Administrator (NANPA) 2025 Annual Report, pages 152-153.

⁷ North American Numbering Plan (NANP) Exhaust Analysis, April 2026, online:

https://www.nanpa.com/sites/default/files/2026-04/April_2026_NANP_Exhaust_Analysis_Final.pdf

7. However, as the current record identifies, there has been minimal uptake in this proceeding overall, and the comments provided to-date do not provide a sufficient record from which a clear decision could be made.
8. CTA would note that of the 14 interventions filed (including its own): 2 are filed by entities that don't lease TNs but highlight other concerns,⁸ one provides a point of clarity with the US environment,⁹ two specifically ask for a pause,¹⁰ and another 3 simply state their desire to be an intervenor in the proceeding.¹¹ The remaining six¹² interventions provide support for the notion of number management activities but do not provide a singular view regarding how that could be achieved within the proposed framework.
9. To be clear, our members universally support the notion of ensuring numbers are properly managed and accounted for. This benefits the entire industry, and allows for robust competition and the delivery of services to Canadians.
10. However, to meet its objectives, this activity must be undertaken with a clear eye, and a clear understanding of elements that to-date remain undefined. CTA respectfully submits that the lack of industry participation in the proceeding, coupled with the lack of clarity on key elements and clear consensus amongst current participants, require the Commission to take steps to pause the proceeding.
11. For example:
 - there appears to be confusion as to the objective of the proceeding which further lends support for the need for clarification. Both the Canadian Anti-Fraud Centre ("CAFC")¹³ and Deaf Wireless Canada Consultative Committee ("DWCC")¹⁴ outline uses for the data that is intended to be collected that fall outside of the identified objective and scope.
 - in addition, the Alliance for Telecommunications Industry Solutions ("ATIS") provided a clarification that it believed was necessary for the Commission to make [emphasis added]:

⁸ CAFC; DWCC.

⁹ Alliance for Telecommunications Industry Solutions.

¹⁰ CTA; Bandwidth; Rogers also acknowledges the benefit of a pause in their intervention.

¹¹ Terrestar Solutions; Canadian Numbering Administration Consortium Inc.; Quebecor.

¹² TekSavvy; Iristel; Rogers; Fibernetics; Independent Telecommunications Providers Assoc.; TELUS.

*“4. To provide a clearer understanding of the U.S. regulatory framework governing numbering resources, **ATIS INC would like to clarify a statement made in Telecom Decision CRTC 2025-252. Telecom Decision CRTC 2025-252 states that, “[i]n the U.S., “all entities holding numbering resources must report usage directly to the administrator.”**”³ INC respectfully clarifies that, in the U.S., numbering usage reporting obligations do not apply to every entity that may receive numbering resources downstream.*

*5. Accordingly, **INC recommends that the record in this proceeding distinguish between entities that are directly assigned numbering resources by the North American Numbering Plan Administrator (NANPA) and therefore are subject to NRUF reporting obligations, and entities that may receive or use numbering resources through commercial or operational arrangements but are not the direct assignees. In the U.S., NRUF reporting is limited to service providers that are authorized numbering resource assignees and hold an Operating Company Number (OCN) and a Federal Registration Number (FRN), as these identifiers are required to submit utilization and forecast data to the NANPA.**”*

12. Direct support for a pause of the current proceeding was also provided by Bandwidth and Rogers in their interventions, highlighting the complexity of the numbering environment and need for industry alignment [emphasis added]:

*“Bandwidth operates primarily as a wholesale service provider in the United States and Canada and has extensive experience with the complexities of the North American Numbering Plan. Accordingly, **Bandwidth recommends that the Commission consider an effort to convene industry experts in a workshop or other forum to discuss the future of Canadian numbering as a beneficial and appropriate component of its considerations in this proceeding.**”¹⁵*

*“At the outset, Rogers notes that it has reviewed the Canadian Telecommunications Association’s (CTA) draft submission in this proceeding. **Rogers agrees that there may be value in pausing this consultation and providing direction to the Canadian Steering Committee on Numbering (CSCN) to further examine and clarify certain underlying issues related to telephone number resale, including definitions of acceptable and***

¹⁵ See Bandwidth intervention filed with Commission on May 19th.

unacceptable uses of Canadian telephone numbers. At the same time, in order to assist the Commission in advancing its analysis, Rogers provides below its responses to the questions set out in the Notice. Rogers reserves the right to modify or supplement its submissions at a later stage of this proceeding in light of any additional evidence or developments arising from CSCN discussions.”¹⁶

13. CTA reiterates its 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?”
14. We continue to urge the Commission to direct CSCN and the industry to report on the delineation between “legitimate” and “illegitimate” and “efficient” or “inefficient” use of numbering resources, and to discuss and identify the proposed data reporting requirements, as well as the scope of their usage, before additional steps are taken.
16. 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.

Kind regards,



Ursula Grant,
VP Industry and Consumer Affairs

*** End of Document ***

¹⁶ See Telecom Notice of Consultation CRTC 2026-61: Call for comments – Strengthening numbering usage management practices – Rogers’ Intervention, at paragraph 3.