

Wireless Number Portability

Second Quarterly Report to the CRTC



filed by:
Canadian Wireless Telecommunications
Association

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1.0 Introduction

In Telecom Decision CRTC 2005-72, *Implementation of wireless number portability* (Decision 2005-72), the Commission directed the Canadian Wireless Telecommunications Association (CWTA) to “file quarterly reports in order to inform the Commission of the wireless industry’s progress in implementing WNP”. CWTA filed the first report on January 31, 2006.

This update is submitted on behalf of Aliant Mobility, Bell Mobility, Bell Nordiq, MTS Mobility, Rogers Wireless, SaskTel, TBayTel Mobility and TELUS Mobility and covers the period between February 1, 2006 and April 28, 2006.

Since the filing of the last report, the Canadian wireless industry has continued towards implementation of WNP and has devoted significant time and resources to the task.

2.0 Key Industry Activities between February 1, 2006 and April 28, 2006

- CWTA has continued program management activities for WNP implementation.
- CWTA, and individual members filed Comments and Reply Comments to Telecom Public Notice CRTC 2006-3, *Regulatory issues related to the implementation of wireless number portability*.
- The Project Management Office (PMO), in conjunction with the wireless carriers, has prepared a revised implementation plan to reflect the March 14, 2007 implementation date established in Decision 2005-72 (i.e. by working backwards from the March 14, 2007 launch date).
- The industry continues to assess and rank risks to the WNP implementation plan and consumer experience, as well as to identify strategies to mitigate these risks.
- Under the coordination of the PMO, individual work stream teams have continued working on the various implementation tasks. There are roughly a dozen weekly conference calls of each of the various work streams. These work streams include:
 - **Canadian WNP Guide (CWNPG)**
 - **Industry Clearinghouse**
 - **CLNPC/Neustar**
 - **Shared NXX**
 - **Mobile Identification Number (MIN) Block Identifiers (MBI) Management**
 - **Inter-Carrier Testing**
 - **Marketing Communication**
 - **Legal**
 - **Regulatory**
 - **PMO**
 - **Short Message Service (SMS)/Multi-media Messaging Service (MMS)**
- CWTA WNP Implementation Task Force (WNPITF) members have also been attending meetings of broader industry groups
 - CISC BPWG

- CSCN
- CLNPC NPAC Ops
- Canadian Numbering Administration Consortium (CNAC)
- Discussions have continued between CLNPC and the WNPITF.
- The Canadian Numbering Administrator Consortium has conditionally accepted the role of Canadian MBI administration pending CRTC direction.
- The CSCN has begun development of MBI Assignment Guidelines.
- Work has continued between the WNPITF and BPWG to the mapping of data elements and other processes required for intermodal porting.
- A Request for Proposals for an industry porting clearinghouse has been concluded and a vendor selected.
- Wireless carriers have established development teams and continue to define the known business requirements, secure resources and funding.

3.0 Key Risks to the Implementation Schedule and Customer Experience

As in the first report, the WNPITF is of the view that there are several key risks that could negatively impact the implementation schedule and customer experience. The first risk stems from a number of yet to be resolved regulatory issues. The second risk stems from the reduced amount of time available for testing, the timing of testing (i.e. during the fourth quarter period – the busiest quarter for consumer activity) and the absence of any buffer between the conclusion of testing and the launch date. A third key risk has been added with respect to the development of the automated interchange of customer information through the Clearinghouse.

3.1 Outstanding Regulatory Issues

CWTA notes that the Commission issued Telecom Public Notice CRTC 2006-3, *Regulatory issues related to the implementation of wireless number portability*, shortly after CWTA filed its first report on January 31, 2006. Generally, the Notice addressed each of the outstanding regulatory issues identified by CWTA.

Until a decision is rendered in the current proceeding, key business requirements affecting critical project milestones remain unknown to the implementation team and assumptions must be made where possible. The business rules could change because of the Commission's decision and the new rules would then have to be built into the WNP regime to ensure that customers enjoy a positive porting experience that is consistent with the industry's desire and the Commission's directives. Not knowing the business rules at this time poses a considerable risk to the Information Technology/Information System (IT/IS) and network systems build in particular, as well as to the entire test phase, and the target launch date.

3.1.1 Not all carriers are participating in implementation activities

Not all wireless carriers in Canada have become involved in the WNP implementation. To date, the Commission has not identified or contacted all of the facilities-based

wireless carriers that must participate in WNP implementation. On January 11, 2006, CWTA sent a letter to Commission staff requesting that the Commission contact all facilities-based wireless carrier that were not party to the proceeding leading to Decision CRTC 2005-72. On March 3, 2006, CWTA sent a letter to Commission staff identifying certain known carriers that had not become engaged in the WNP implementation process.

Accommodating the needs of any new carriers late in the program could pose a risk to testing and general readiness timelines. Moreover, the late arrival of additional carriers will lead to customer confusion if these carriers are not ready for launch – indeed, they should be ready in time for inter-carrier testing. That customer confusion would reflect negatively on the entire wireless industry. The test plans that are currently under development only contemplate testing amongst the carriers that have already identified themselves. If some wireless carriers are not prepared for WNP, wireless customers could be significantly affected when they roam away from their own service provider's network, including not being able to use the service at all.

In addition to the absence of certain wireless carriers, not all wireline CLECs are involved in the preparations for intermodal porting. Given the significant impacts WNP will have on the entire Canadian telecommunications industry, CWTA believes it is imperative that the Commission notify all Canadian carriers of their obligations with respect to WNP.

3.1.2 CLNPC Unanimous Shareholders Agreement

In Telecom Order CRTC 2006-25, the Commission approved an Amending Agreement to the *Amended and Restated Unanimous Shareholders Agreement* of the Canadian LNP Consortium. This agreement allowed the wireless carriers to join the CLNPC for the purposes of negotiating the details, including cost-sharing formulas, of the wireless carriers joining as full shareholders of the CLNPC. Those negotiations have now completed, and a further *Amended Unanimous Shareholders Agreement* has been filed for Commission approval. Timely approval of this agreement by the Commission will remove any uncertainty that changes will be required. Any such changes could impact the WNP implementation plan.

3.1.3 Impact of SILEC Decision

In Telecom Decision CRTC 2006-14, the Commission introduced local competition in the territories of all of the small incumbent local exchange carriers SILECs. The specific impact of this Decision is unknown, but the addition of LNP and WNP in SILEC territories could increase the workload faced by CLNPC, NPAC/SMS and the SILECs themselves. It may also change the number and structure of testing scenarios.

3.1.2 MBI Administration

One new regulatory issue has been identified since the last quarterly report, namely the Administration of MIN Block Identifiers. CWTA has requested the Canadian Numbering

Administrator to take the role of administrating the MIN Block Identifiers for Canada's wireless carriers. The Canadian Numbering Administration Consortium has conditionally accepted the task pending a specific regulatory requirement to do so. As a result of this decision, CWTA requests the Commission or Commission staff direct the CNA to carry out the role of MBI Administrator for Canada.

3.2 Testing

Compounding the challenges the carriers face with an abbreviated WNP implementation window is the Commission's assumption that the carriers will be able to continue testing during the busy fourth quarter and that elements of the pilot testing could be performed concurrently. The WNPITF remains concerned that there is little room in the schedule to redevelop and re-test any element of the program that fails testing in the first pass.

3.2.1 Scheduling

The WNPITF has spent considerable time developing a testing schedule, but if any significant issues arise, they will pose a timing challenge and risk achievement of a positive customer experience.

3.3 Clearinghouse

As noted above, the industry has selected a vendor to provide porting clearinghouse services. An issue has emerged with respect to certain delivery dates from the vendor.

The timeline to develop a wireless and inter-modal porting clearinghouse for Canada is more complex than anticipated and will take longer to develop than expected, thereby reducing the buffer between delivery of solution components and when the entire solution is available for inter-carrier testing. At present, the WNPITF is working with the vendor to assess the full extent of the impacts of any new dates on the WNP implementation and determining strategies to mitigate these impacts.

4.0 Conclusion

The wireless carriers remain committed to a successful launch of WNP with a positive customer experience. The industry is doing everything reasonable within its power to move forward efficiently with this project. Given that WNP will have a significant impact on consumers, the industry and the Commission together, must be mindful of our mutual goal of ensuring quick and seamless customer porting experiences. We look forward to continuing the work with other stakeholders to ensure a smooth and efficient porting process for the benefit of Canadian consumers.

Nevertheless, as stated above, the industry remains concerned that delays in resolving the outstanding regulatory issues will place the March 2007 launch date in jeopardy and potentially negatively impact the customer porting experience. The industry is concerned that, in the absence of the necessary regulatory determinations, the potential cost

implications of making last minute modifications to the systems and processes that are being developed absent the necessary regulatory determinations could be material.

Because the time available for testing is short, and testing itself is contingent on so many external factors, this is the area posing the greatest industry challenge at this time.