

# Wireless Number Portability

## Third 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”.

This update is submitted on behalf of Aliant Mobility, Bell Mobility, Bell Nordiq, KMTS, MTS Mobility, Rogers Wireless, SaskTel, TBayTel Mobility and TELUS Mobility and covers the period between April 29, 2006 and July 31, 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 April 29, 2006 and July 31, 2006**

- CWTA has continued program management activities for WNP implementation.
- CWTA has reviewed the determinations contained in Telecom Decision CRTC 2006-28 in order to determine the impacts on the implementation plan.
- The Project Management Office (PMO), in conjunction with the wireless carriers, continues to fine-tune the implementation plan to include any new tasks, changes to deadlines, etc. as they become evident, always maintaining the March 14, 2007 implementation date established in Decision 2005-72.
- 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. The following eleven work streams meet weekly, or more often as required:
  - Canadian WNP Guide (CWNPNG)
  - Industry Clearinghouse
  - CLNPC/Neustar
  - Shared NXX
  - Mobile Identification Number (MIN) Block Identifiers (MBI) Management
  - Inter-Carrier Testing
  - Marketing Communications
  - 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
  - CISC NTWG
  - CISC ESG

- Canadian Steering Committee on Numbering (CSCN)
  - CLNPC NPAC Ops
  - Canadian Numbering Administration Consortium (CNAC)
- Activities of the above groups includes work on three reports mandated by Telecom Decision CRTC 2006-28, including:
  - NTWG developing a roll-out schedule for non-portable exchanges
  - CSCN modifying the LRN Assignment Guidelines
  - BPWG developing a bulk number porting process
- CWTA recently contacted the CISC ESWG Chair to request that WNP be added as an agenda item as there are certain processes and test plans that will require review and agreement of the Public Safety Answering Points (PSAPs). The ESWG has agreed to set up a WNP Sub-Committee and has already expressed concern with the aggressive schedule the wireless industry requires in order to meet March 14, 2007.
- 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 completed development of MBI Assignment Guidelines and submitted them for CISC and CRTC approval.
- Work has continued between the WNPITF and BPWG on the mapping of data elements and other processes required for intermodal porting, as well as those which will be reflected in CLOG 6.
- Work has continued with the industry porting Clearinghouse vendor to ensure they can meet the requirements of the Canadian industry.
- Wireless carriers' internal development teams continue to work on the planning and development of internal systems, processes and test plans.

### **3.0 Key Risks to the Implementation Schedule and Customer Experience**

As in the first and second reports, the WNPITF is of the view that there are several key risks that could negatively impact the implementation schedule and customer experience. These risks include:

1. A number of unresolved regulatory and industry issues.
2. The reduced amount of time available for testing, the timing of testing and the absence of any buffer between the conclusion of testing and the launch date.
3. Shared NXX/Bulk Porting. The industry is working to understand all impacts where bulk porting is used as a solution to the Shared NXX problem, including processes, timing and costs. In addition, bulk porting has a dependency on CISC groups to report to the CRTC on process and roll-out schedule.
4. The development and vendor delivery of the automated interchange of customer information through the Clearinghouse.

### **3.1 Outstanding Regulatory and Industry Issues**

Telecom Decision CRTC 2006-28 was issued shortly after CWTA filed its second report. Generally, the Decision addressed each of the outstanding regulatory issues previously identified by CWTA.

CWTA notes that there are still a few items that will remain outstanding pending completion of reports by the CISC (i.e. the BPWG Process for Bulk Porting and NTWG for Roll-out Schedule). Until those reports receive Commission approval there remains a certain level of 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

There remain a number of Canadian carriers (both WSP and LEC) that are not participating in the implementation activities either within the CWTA WNPITF or the CISC. It is our understanding that CRTC Staff intend to issue letters to carriers informing them of certain key dates related to the WNP implementation.

As the CWTA has previously reported, 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 their customers may not be able to port-out effectively, as one example, as required in Decision 2005-72.

We are fast approaching the date at which the WNP implementation program will no longer be able to accept or accommodate new participants to the inter-carrier testing activities. The test plan will only be able to provide limited testing to new participants after September 1, 2006, and it is unlikely that the test plan will be able to accommodate a new carrier at all after October 13, 2006.

Given the significant impacts WNP will have on the Canadian telecommunications industry, and the potential negative consequences for Canadian consumers, CWTA believes it is imperative that the Commission notify all Canadian carriers of their obligations with respect to WNP. The CWTA appreciates the actions of CRTC Staff in this regard.

### 3.1.2 Impact of SILEC Decision

As expected, the introduction of local competition in the territories of the small incumbent local exchange carriers (SILECs) as a result of Telecom Decision CRTC 2006-14 is already having an impact on Canada's LNP systems. Requests to implement

LNP in SILEC territories have begun and will increase the workload faced by CLNPC, NPAC/SMS and the SILECs themselves.

### 3.1.3 LNP Roll-out Schedule

The Roll-out schedule under development in the NTWG will have an impact on the level of workload imposed on all carriers. For each new additional LNP capable exchange there is added complexity to the project, including additional switching upgrades, additional testing (internal and inter-carrier), increased translation activities, and the likelihood of more numbers to be bulk-ported – all dependant on the same finite resources. Until the list is completed by the NTWG and approved by the Commission, the workload impact on all carriers will remain unclear.

### 3.1.4 MBI Administration

The CNAC has conditionally accepted the task of administering MIN Block Identifiers pending a specific regulatory requirement to do so. CSCN has now completed development of MBI Assignment Guidelines and submitted them for CISC and Commission approval.

### 3.1.5 OSS Vendor Support

Certain wireless carriers are concerned with the increased instability in the region that includes the location of a major OSS vendor. This instability could impact the vendor's ability to provide upgraded systems to the carriers within the already strict timelines.

## **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. This concern is primarily related to the testing of inter-carrier processes, but there are also risks associated with the Acceptance Testing of the industry Clearinghouse and of the bulk porting process for Shared NXXs which are incremental to the original test plan.

### 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 Shared NXX/Bulk Porting**

In Telecom Decision CRTC 2006-28 the Commission determined that bulk number porting of leased numbers is only required to be done in those exchanges that are LNP-capable and that the bulk porting need only be completed at the time of WNP launch.

The latest analysis indicates that there are approximately 2.5 million numbers that will need to be bulk ported prior to WNP launch. This is only an estimate, as the LNP/WNP roll-out schedule has not been completed, and the list of LNP capable exchanges is not complete. Carriers are dependent on the Roll-out Schedule to be provided by the NTWG.

CWTA understands that the ILECs will not be able to begin bulk porting until January 15, 2007. Some wireless carriers consider a January 2007 commencement of bulk porting to be extremely late in the program thereby creating a significant risk to the overall implementation launch date and customer experience.

At any rate, the method by which bulk porting will take place has not yet been decided, and certain alternatives may prove to be cost-prohibitive. The generation and analysis of alternative methods is dependant on the work of the BPWG and CLNPC NPAC Ops.

Underlying all these concerns is the fact that bulk porting must work seamlessly, as the changes will affect the services of working customers.

### **3.4 Clearinghouse**

As noted above, the industry has selected a vendor to provide porting Clearinghouse services and is working with the vendor to ensure they can meet the requirements of the Canadian industry. These Canadian requirements include the requirements contained in the CWNPG (Canadian Wireless Number Portability Guidelines), CLOG and CDIG. In addition to these requirements, the Canadian solution requires French character support. These items were never part of the systems built for the U.S. WNP implementation.

As a result of these Canadian requirements, the task of developing a wireless and inter-modal porting Clearinghouse is more complex than would appear to outside observers, and is taking longer to develop than anticipated in the Commission's analysis that led to the March 14, 2007 launch date. This additional time further reduces the buffer between delivery of solution components and when the entire solution is available for inter-carrier testing. Since the last quarterly report, the WNPITF has worked with the vendor to assess the full extent of the impacts and develop 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 any delays in resolving some of the outstanding regulatory and industry issues identified in this Report could materially impact the systems and processes that are being developed. Further, delays or problems encountered in any one of a number of individual tasks could place the March 2007 launch date in jeopardy and potentially negatively impact the customer porting experience. The industry remains concerned that the tight timelines and relatively short buffers resulting from the Commission's mandated implementation date of March 14, 2007 have left the industry with very little margin for error.

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