

# Wireless Number Portability

## Fifth 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 November 1, 2006 and January 31, 2007.

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

## 2.0 Key Industry Activities between November 1, 2006 and January 31, 2007

- CWTA has continued program management activities for WNP implementation. Discussions have begun concerning the post-launch governance structure that would be required to successfully maintain the WNP program, recognizing that many activities must continue after March 2007.
- 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 Project Management Office (PMO), individual work stream teams have continued working on the various implementation tasks. As the project has evolved and work has progressed, the work streams have adjusted themselves accordingly. Most of the following twelve work streams, and their sub working groups, meet weekly, or more often as required:
  - Canadian WNP Guide (CWNPNG)
    - Industry Fall Out Management/Coordination sub working group
  - Industry Clearinghouse
    - Defect Management and Prioritization sub working group
    - ICH Acceptance Testing sub working group
  - CLNPC/NeuStar
  - Shared NXX
    - LRN Testing sub working group (completed)
    - Bulk Porting Pilot sub working group (completed)
    - Bulk Porting Error Management sub working group (completed)
    - Scheduling and Sequencing sub working group
  - 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)
- Network Readiness
- WNP Implementation Task Force (WNPITF) members continue to attend 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 included work on the following items:
  - BPWG providing updates to BPRE062b
  - BPWG developing a bulk number porting process for Phase 2 activity.
- Work has continued between CLNPC and the WNPITF regarding overall requirements for the scheduling and implementation of the bulk porting process.
- Work has continued with the industry porting Clearinghouse vendor to ensure it can meet the full requirements of the Canadian industry .
- Wireless carriers' internal development teams continue to work on the planning, development and testing of internal systems and processes, including the support of Mobile Virtual Network Operators (MVNOs) and resellers, who are dependent upon their underlying carrier as directed in CRTC Decisions 2005 -72 and 2006-14.

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

There are several key risks that will and are negatively impacting the implementation schedule and customer experience. These risks, which are further explained below, include:

1. The implementation timeline and quality of deliverables provided by the Clearinghouse vendor.
2. The limited amount of time originally made available for testing and the absence of any buffer between the conclusion of testing and the WNP launch date.
3. Shared NXX/Bulk Porting.
4. Remaining unresolved regulatory issues, specifically the uncertainty created by recent statements made by the SILECs.

The risks, likelihood of occurring, and impact are summarized in the following table:

<u>Risk</u>	<u>Probability of Occurring</u>	<u>Impact if Occurs</u>
1. Clearinghouse application delivery timing or quality issues and downstream impact on carrier application testing and readiness	High	High
2. Lack of Time for testing and error correction	High	High
3. Unable to complete Shared NXX bulk porting	Medium	Medium
4. Unresolved regulatory issues	Low	Low

### **3.1 Clearinghouse**

The industry continues work to ensure th at the Clearinghouse application can meet the requirements of the Canadian industry ; however, the implementation timeline and quality of Clearinghouse application continue to pose a risk to overall program completion . The Industry Defect Management sub working group continues to manage this risk by working closely with the Clearinghouse vendor to identify, prioritize and mitigate impacts that result from the code quality.

Currently the wireless to wireless porting requirements have been delivered and most high severity defects have been identified and resolved . CWTA notes that a large number of medium and low severity defects are still outstanding , with no scheduled resolution date. None of these defects are considered critical to program launch of wireless to wireless porting. The carriers have started an impact analysis to understand the overall, cumulative impact caused by these defects and any associated work-arounds that may be required.

Meeting intermodal porting requirements continues to pose a more significant challenge. The task of developing and testing an intermodal porting Clearinghouse process continues to be an immensely complex endeavour , as the requirements for wireline porting are more onerous than for wireless. The vendor continues to provide updated versions of the intermodal software to address identified defects. However, several key defects remain outstanding and the quality of the code continues to be a concern. Further, each new code release requires carriers to retest the entire appl ication to ensure that additional defects have not been introduced. For example, new high priority intermodal porting defects were identified on 1/30/07. These defects, plus any additional high priority defects that may be found in the next few weeks must be addressed a code release scheduled for delivery on February 19. The carriers are reliant on the vendor providing a working code release on February 19. Until this release is received and tested, the ability to deliver an acceptable customer experience f or intermodal porting remains at risk.

CWTA wishes to highlight that there is less than one month between the planned code delivery date and the launch date, adding incremental risk to the program. The risks presented by this situation are compounded by the fact that this release can not be promoted to the Clearinghouse production environment until February 26, a mere 16 days before planned implementation. CWTA notes that the limited time available for production testing is significantly less than planned and significantly less than would be considered prudent for any major software application.

### **3.2 Testing**

The WNPITF remains concerned that there is no room left in the schedule to redevelop and re-test any element of the program that fails testing in the first pass. This situation is made more problematic because only limited testing of the production Service Management Gateway (SMG) has yet taken place. This limited production environment testing has been primarily conducted by GUI SMG users. To date, no OSS testing has occurred in the SMG production environment. This concern is primarily related to the testing of inter-carrier processes, although it does increase the risks associated with Acceptance Testing of the industry Clearinghouse application.

Quality issues associated with the Clearinghouse application have continued to delay the planned acceptance of that platform, and, as a result, the industry has had to perform ICT testing in parallel to Acceptance Testing activities. Further, certain carriers have delayed the scheduled start of their participation in Inter-Carrier Testing (ICT) due to internal development problems.

### **3.3 Shared NXX/Bulk Porting**

Since the last report, the Shared NXX work stream successfully completed Bulk Porting Pilot activities in Penticton BC. This activity provided the industry with an excellent perspective on key network readiness elements as well as the robustness of the bulk porting process. Despite this success, the need to bulk port 3 million numbers prior to launch continues to represent a risk.

Bulk porting of Phase 1a numbers began on January 22<sup>nd</sup>. The industry expects to move some 2.5 million telephone numbers during this phase, which is currently scheduled to end on February 12th 2007. This represents roughly 1.4 telephone numbers per second over the course of 21 days.

During Phase 1b (scheduled for the end of February) a further 600,000 telephone numbers are expected to be Bulk Ported. In preparation for Phase 1b, the WNPITF has been working to ensure that test calls are being conducted by other carriers (e.g. not the Shared NXX lessee or lessor).

The dates for Bulk Porting continue to be subject to change. As the Industry proceeds with the execution of Bulk Porting, issues are being addressed as they arise. However,

with any new high-volume industry activity, there exist many unknowns which add risk and the possibility of delay. Customer impacting troubles have already been encountered. There have also been several scheduling changes that could in turn cause delays to future pre-planned dates. (For example, the industry was behind schedule by approximately 100,000 numbers as of January 28).

Several issues – namely timing and network readiness (e.g. first port notifications, LRN testing, network translations and upgrades, LERG updates, LRN routing) - continue to be a concern for the bulk porting activities scheduled to occur in Phases 1a and 1b. If a Phase 1a or 1b exchange slips it will impact i) the ability to meet the 2.5 hour interval mandated in exchanges to be opened for March 14 (i.e. Phase 1 exchanges), and ii) the customer experience related to porting if we proceed in an exchange where Bulk Porting has not been completed. Furthermore, any exchanges that cannot be bulk ported prior to launch because these activities have not been completed will need to be rescheduled for Phase 2, which may have a detrimental effect on the current NTWG roll -out schedule.

In the event of exchange readiness problems and/or post LRN testing issues, it may become necessary to move the bulk porting of some telephone numbers to Phase 2. Planning for Phase 2 – after March 14, 2007 – is currently behind schedule and could have implications for the post launch roll-out schedule.

Underlying all these concerns is the fact that bulk porting must work seamlessly, as the changes will affect the services of working customers. The purpose of bulk porting is to ensure the Service Provider ID (SPID) of the Telephone Number reflects the true service provider supporting that TN. When a port request is received at the Clearinghouse, the Old Service Provider (OSP) must be properly identified in order to achieve the 2.5 business hour porting interval.

### **3.4 Outstanding Regulatory Issues**

Since the filing of our last quarterly report, we have learned that certain SILECs have indicated that they will not participate in the roll-out of WNP after March 14, 2006, despite the fact that several SILEC exchanges were included in the roll -out schedule approved by the Commission in Telecom Decision CRTC 2006-74. A letter dated December 1, 2006 signed by 28 of approximately 39 SILECs states they will not participate in WNP until “a full public hearing is held”.

CWTA is concerned this may have a negative impact on the roll -out of WNP and increase the level of customer confusion about where and when WNP will be available. We would ask that the Commission provide clarity on this matter as soon as possible.

### **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 (including significant overtime commitments).

Given that WNP will have a significant impact on customers, both the industry and the Commission must be mindful of our mutual goal of ensuring quick and seamless customer porting experiences.

Nevertheless, as noted above, there remain significant risks to the program . Delays or problems encountered in any one of a number of individual tas ks could place the March 2007 launch date in jeopardy and negatively impact the customer porting experience .

The industry reiterates its concern that the tight timelines resulting from the mandated implementation date of March 14, 2007 have left the industry with no margin for error. At this time, CWTA believes that successful launch will rest on 1) the successful delivery of the full Clearinghouse solution; 2) the successful completion of testing, and 3) successful bulk porting of the shared NXXs.