



Telecom Decision CRTC 2025-252

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CISC Canadian Steering Committee on Numbering – Consensus report CNRE144B – Recommendations to strengthen the number assignment guidelines

Summary

Telephone numbers are critical to our modern communications system. Increased cellphone usage, as well as services like machine-to-machine communications and Internet of Things applications, are increasing the demand for this finite resource.

In Telecom Regulatory Policy 2024-26 (the Policy), the Commission introduced measures to help preserve telephone numbers. The Commission also requested that the CRTC Interconnection Steering Committee (CISC) Canadian Steering Committee on Numbering (CSCN) recommend ways to strengthen Canadian number assignment guidelines. In response, the CSCN filed a report with the Commission recommending more frequent numbering forecasts and the introduction of number usage reporting when carriers complete forecasts or request new numbers.

In this decision, the Commission approves the recommendations in the CSCN's report. These recommendations take industry input into account and help achieve the objectives of the Policy. They promote stronger oversight and more responsible use of telephone numbers, which ultimately benefits Canadians.

The Commission will launch a notice of consultation to examine whether and how to collect additional data to provide the Canadian Numbering Administrator with a more complete picture of the status of numbering resources in Canada.

Background

1. In *Implementing thousand-block pooling*, Telecom Regulatory Policy CRTC 2024-26, 5 February 2024 (the Policy), the Commission introduced measures to preserve telephone numbering resources, including the implementation of thousand-block pooling. These measures help (i) increase scrutiny when carriers request numbering resources and (ii) manage numbering resources so that they are only used when and where required.

2. In the Policy, the Commission also requested that the Canadian Steering Committee on Numbering (CSCN)¹ of the CRTC Interconnection Steering Committee (CISC) provide recommendations to strengthen the number assignment guidelines, focusing on preserving numbering resources during and after the implementation of thousand-block pooling.²

The report

3. On 4 September 2024, the Commission received CSCN consensus report [CNRE144B](#) (the Report), in which the CSCN recommended:
 - 1) introducing number usage reporting requirements for Canadian carriers when forecasting or requesting new numbers; and
 - 2) increasing the frequency and granularity of forecasting exercises.
4. In addressing the Commission's request in the Policy, the CSCN reviewed its numbering resource forecasting and reporting practices. It compared current practices in Canada to those in place in the United States (U.S.), the only other country to have implemented thousand-block pooling in North America.
5. The CSCN comprises Canadian telecommunications service providers (TSPs) and experts in Canadian numbering and is open to the public. The Commission considers that the recommendations in the Report, approved by consensus, accurately reflect the views of the telecommunications industry.

Recommendation 1: Introducing number usage reporting requirements

6. In Canada, current number forecasting exercises consist of tracking the quantity of telephone numbers assigned to a carrier, and a carrier's projected needs for numbering resources in the coming years. Carriers complete a "months-to-exhaust" worksheet on which they must demonstrate that their expected growth will exceed their current inventory of assignable numbers in the affected area within 12 months of their request.
7. Currently, carriers are not required to report how many of the numbers allocated to them by the Canadian Numbering Administrator (CNA)³ are actively in use by end-users on Canadian networks. Similarly, carriers in Canada do not need to meet a

¹ The CSCN is a CISC working group that addresses numbering issues that fall under the jurisdiction of the Commission. The CSCN is currently chaired by the Canadian Numbering Administrator, which administers Canada's telecommunications numbering resources on behalf of the Commission.

² See paragraph 51 of the Policy.

³ The CNA is responsible for assigning numbering resources to Canadian carriers. The CNA also manages guidelines that outline how telephone numbers in Canada should be planned, forecasted, and assigned.

set usage threshold (i.e., a minimum rate of active assigned numbers) when requesting additional numbers.

8. The CSCN noted that since the early 2000s, TSPs in the U.S. must demonstrate that they are using at least 75% of their assigned resources in a given exchange area before they can obtain new numbering resources. This encourages efficient use of numbers and helps to identify those TSPs not using their resources effectively.
9. The CSCN recommended updating the [Canadian Central Office \[CO\] Code \(NXX\) Assignment Guideline](#) (the CO Code Assignment Guideline)⁴ to introduce a requirement for Canadian carriers to report on their numbering resource usage and achieve a 75% utilization rate to qualify for additional resources. Per the Report, a carrier's usage rate would be calculated based on, among other things:
 - the total quantity of telephone numbers a carrier holds (Total TNs);
 - the quantity of numbers that have been assigned to end-users (Assigned TNs); and
 - the quantity of resold numbers that remain unassigned or for which assignment data has not been reported back to the reseller (Unassigned or Unreported Resold TNs).
10. The usage calculation recommended by the CSCN is similar to the U.S. model, with the exception that the CSCN's proposed reporting requirements would apply only to carriers that obtain numbering resources directly from the CNA. This would make such carriers responsible for collecting and integrating usage data from third parties to which they have resold numbers. In the U.S., all entities holding numbering resources must report usage directly to the administrator.
11. If third parties fail to provide downstream usage data, the CSCN's proposed usage calculation makes it possible for carriers who resell numbers to achieve a 75% utilization rate. In such cases, the calculation will only include data the carrier has access to (i.e., its own data and any data provided by third parties that comply). If the carrier can demonstrate that 75% of the numbers it holds (including those resold to third parties that report usage data) are assigned to end-users, it will be eligible to request more numbering resources.
12. The CSCN also recommended introducing usage reporting requirements to forecasting exercises because it would allow the CNA to (i) examine how efficiently carriers are using their numbering resources and (ii) manage the thousands-block pools more effectively. The CSCN added that a baseline usage rate should be

⁴ The CO Code Assignment Guideline provides instructions for managing telephone number central office codes (i.e., the first three digits of a seven-digit telephone number). It helps ensure that numbering resources are allocated and used properly.

established so that the success of thousand-block pooling could be measured after its implementation. The CSCN therefore recommended that carriers provide usage data to the CNA before thousand-block pooling is implemented.

13. The CSCN suggested it would be beneficial for carriers to gain experience with the new process before usage reporting becomes a requirement to obtain additional numbering resources. The CSCN recommended that carriers initially start providing usage data in their applications for new numbering resources without needing to meet the 75% utilization threshold. The 75% threshold would be imposed on carriers only 18 months after usage reporting is implemented in general forecasting exercises.

Commission's analysis

14. Implementing measures to collect and track numbering resource usage data will strengthen Canadian numbering administration. Currently, carriers are not required to report on how many previously assigned resources are in use when forecasting future need or requesting new numbers. While the Commission's October 2023 [interim measure](#) requires carriers to attest that they do not possess unused numbers from previous allocations before requests for additional resources can be considered, neither the Commission nor the CNA can verify this independently.
15. To close this gap, more information could be made available regarding the status of numbers allocated to a carrier and a formula could be applied to calculate utilization rate based on this information. Further, carriers could be required to meet a minimum utilization threshold of 75% in order to request new numbers from the CNA.
16. The Commission notes that usage reporting has been in place in the U.S. since 2001, following the establishment of thousand-block pooling by the Federal Communications Commission. The CSCN's recommendation considers the lessons learned in the U.S. and will improve the management of Canadian numbering resources if implemented as proposed.
17. The Commission considers that implementing a 75% utilization threshold would be a valuable addition to the current factors the CNA and the Commission already consider when reviewing a request for numbering resources. Currently, these factors include (i) whether the request exceeds the carrier's forecast, (ii) whether the carrier has unused numbers from previous assignments, and (iii) the impact on number availability across Canada or in a specific region.
18. Carriers assigning telephone numbers directly to retail end-users (without reselling) will be eligible to request additional resources if they can demonstrate that 75% of the numbers allocated to them by the CNA have been assigned.
19. Carriers that resell telephone numbers will have to account for the quantity of unassigned and unreported numbers they have resold to third parties. The CSCN defines "unassigned" telephone numbers as those that have been allocated to a carrier but not assigned to an end-user. It defines "unreported" numbers as those that have been allocated to a carrier but for which the status is unknown.

20. The CSCN's proposed calculation addresses two main scenarios in the case of carriers that resell telephone numbers:
- A carrier succeeds in obtaining usage data from all its third-party customers. If the carrier can demonstrate that 75% of the numbers held by it and its third-party customers have been assigned to end-users, it will be eligible to request additional resources.
 - One or more third party fails to provide usage data to the carrier. If the carrier is unable to account for third-party data, the utilization calculation will only consider data known to the carrier, including its own data and that provided by compliant third parties, as available. If the carrier can demonstrate that 75% of the numbers held by it and its third-party customers that have provided usage data have been assigned to end-users, the carrier will be eligible to request additional resources.
21. Requiring carriers to report the amount of numbers with an unknown status will benefit the CNA by helping it identify and address potential resource mismanagement. For example, if a carrier consistently reports a high rate of resold numbers for which the status is unknown, the CNA can notify the Commission, which could decide to take further action, namely in the form of an audit.
22. By excluding third-party customers' unreported usage data from a carrier's utilization rate calculation, the CSCN's recommendation prevents carriers from being penalized because of reporting issues caused by their third-party customers.
23. In addition, the CSCN's recommendation considers the limits of the CNA's authority; the CNA can only act in accordance with the CO Code Assignment Guideline, which does not apply to third-party entities.
24. The Commission considers that the CSCN's recommendation to introduce usage reporting requirements is reasonable and reflects the CNA's authority and the Commission's objectives. Including a utilization component to the forecast and resource request processes will:
- give the CNA and the Commission better insight into the state of Canada's numbering resource pool, including information on the quantity of numbers already assigned and the quantity remaining;
 - promote the responsible use of numbering resources and allow the CNA and the Commission to identify carriers that are not using resources efficiently; and
 - provide additional data on resources assigned when the CNA and the Commission consider requests for new or additional numbers.
25. Regarding requests for new numbers, the CSCN suggested a transition period for carriers to practise reporting their usage data before it becomes mandatory. The

Commission considers that this approach is reasonable and will help carriers avoid penalties for any mistakes while they learn the new process.

26. With regard to forecasting exercises, the Commission notes that the CSCN recommended establishing a usage baseline before thousand-block pooling comes into effect.
27. The Commission notes that in May 2025, the CNA initiated a [Special Numbering Resource Utilization Forecast exercise](#), in which it requested that all CO-code-holders provide, by 31 July 2025, their usage data to the CNA, in order to establish the usage baseline recommended by the CSCN. To the extent that CO-code-holders have not yet submitted this data, the Commission considers it appropriate to direct them to do so no later than two weeks following the publication of this decision.
28. With respect to the CSCN's recommendation to exclude unreported numbers from usage calculations, the Commission notes that excluding this data limits the CNA's ability to determine how many allocated telephone numbers remain unassigned, preventing a fulsome view of the numbering landscape. In particular, the recommendation does not sufficiently incentivize carriers to actively obtain complete usage data from their third-party customers, nor does it incentivize third parties to report usage back to the reseller.
29. To address this gap, the Commission will consider supplementary measures to ensure the CNA obtains detailed usage data for all assigned telephone numbers, including those that have been resold. This information would provide the CNA with a more complete picture of the status of numbering resources and align Canadian practices with those in the U.S., where third parties are also required to provide usage data.

Recommendation 2: Increasing the frequency and granularity of forecasting exercises

30. Per the [Canadian Numbering Resource Utilization Forecast Guideline](#) (the C-NRUF Guideline),⁵ carriers submit their forecasted number requirements to the CNA once a year, specifying the number of central office codes they expect they will need in each area code complex.⁶
31. In the Report, the CSCN noted that TSPs in the U.S. must report usage data every six months. This allows regulators and administrators to regularly check whether

⁵ The C-NRUF Guideline explains how telephone number allocation forecasts are carried out in Canada. Carriers that currently hold or plan to hold central office codes must participate in forecasting exercises such as the annual general forecast.

⁶ Due to an ever-increasing demand for telephone numbers, more than one area code is sometimes required for the same geographical area. Multiple area codes serving the same geographical area are known as an area code complex.

carriers are meeting their obligation to return unused numbers to the thousands-block pool for each exchange area.⁷

32. The CSCN also noted that reporting in the U.S. is done at the thousand-block level, but for larger TSPs, this can result in having to manage extensive spreadsheets containing thousands of rows. To avoid unwieldy spreadsheets for Canadian carriers, the CSCN recommended that usage reporting in Canada be done at the exchange-area level instead.
33. In addition, to help the CNA better manage thousands-block pools, the CSCN suggested adjusting forecasts to reflect needs at the more detailed thousand-block level instead of the broader CO-code level.
34. Considering the above, the CSCN recommended that the C-NRUF Guideline be updated so that carriers:
 - submit exchange-level usage data every six months;
 - submit their general forecasts to the CNA every six months instead of annually; and
 - express their forecasted number requirements in terms of the number of thousands-blocks they expect they will need in each exchange, rather than the number of CO codes they expect they will need in each area code complex.

Commission's analysis

35. The Commission considers that increasing the frequency of forecasting exercises will allow the CNA to better monitor the allocation and usage of Canadian numbering resources without placing an undue burden on carriers. Therefore, it would be appropriate to update the C-NRUF Guideline so that the general forecast is conducted every six months, at the exchange level.
36. The Commission also supports the proposal that carriers express their forecasts in the number of thousands-blocks they expect they will need in each exchange, given that they will be requesting numbers in thousands-blocks once thousand-block pooling is implemented.
37. Approving the changes to the CO Code Assignment Guideline and the C-NRUF Guideline would provide the CNA with the necessary tools and authority to effectively scrutinize and enforce responsible numbering resource usage and

⁷ The territory served by a carrier is known as an exchange area.

allocation. The CNA can address any issues directly with carriers and, if required, escalate unresolved cases to the Commission, which aligns with current practices.

38. The Commission considers six months to be a reasonable timeframe within which the CSCN can update the C-NRUF Guideline.

Other considerations

39. Recommendations 1 and 2 address the first consideration listed at paragraph 51 of the Policy, regarding what information carriers should be required to provide to justify a new request for numbering resources. The other considerations are addressed in the paragraphs below.
40. Regarding whether and how a carrier should be responsible for reporting on the use of numbers by another wholesale or third-party customer, the CSCN submitted this consideration is addressed in its recommendation that carriers report on number usage during forecasting exercises and when requesting additional resources.
41. Regarding what would trigger escalation of a particular request for numbers to the Commission, the CSCN proposed that if a carrier requires additional numbering resources but fails to meet the new usage or months-to-exhaust criteria, it could apply to the Commission for a waiver.
42. Regarding what enforcement powers or tools may be appropriate for the CNA to use to scrutinize requests for numbering resources, the CSCN submitted that the CNA already has the authority to check requests against eligibility criteria. No additional enforcement power is therefore needed. If the usage reporting recommendation is approved, the CNA will be able to identify issues such as large amounts of unused numbers, large amounts of resold numbers for which the usage rate is unknown, low usage in specific areas, or poor inventory management. The CNA can address these issues with carriers directly and, if they persist, work with the Commission to address them.
43. Regarding the potential use of enhanced forecasting tools, the CSCN did not recommend any further changes to the general forecast filings other than those discussed in recommendations 1 and 2.
44. Regarding other factors that might be consistent with an increased focus on number preservation, the CSCN acknowledged that further consideration should be given to using geographical numbers for non-geographical applications (e.g., the Internet of Things), conducting audits to increase scrutiny over the allocation and use of numbering resources, and developing best practices to ensure maximum usage of allocated numbers before new thousands-blocks are requested.
45. The CSCN indicated that if the Commission approves the recommendations in the Report, it will review the considerations above with a view to provide follow-up recommendations where applicable.

Commission's analysis

46. The Commission considers that the CNA has the necessary enforcement tools and authority it needs to effectively scrutinize requests for numbering resources. Further, the CNA can escalate any issue to the Commission as needed. Therefore, no additional tools are required at this time.
47. Regarding other factors related to number preservation, the Commission notes that the CSCN plans to review issues affecting the use and preservation of Canadian numbers and submit recommendations to the Commission as needed. This includes a review of "Appendix A – Audits" of the CO Code Assignment Guideline to include number usage reporting requirements any time an audit is required.
48. The Commission considers that it would be beneficial to review and update Appendix A of the CO Code Assignment Guideline as soon as possible to encourage number preservation. Further, the CSCN should file a report to the Commission containing recommendations to update Appendix A of the CO Code Assignment Guideline. The report should include a list of audit-related considerations, including those that may fall outside of the CSCN's mandate (e.g., how audits should be funded) to develop a complete auditing process. Consistent with the CSCN's proposed timelines for updating the guidelines, the CSCN should file this report to the Commission within six months of the Report being approved.
49. The CSCN suggested that requiring carriers to report on usage will sufficiently address the Commission's request for recommendations to strengthen the number assignment guidelines. While the CSCN's recommendations refine the criteria for carriers to request new numbering resources and establish parameters for escalating requests to the Commission, as well as eliminate the need for additional forecasting tools, the recommended measures do not adequately incentivize carriers to obtain usage reports from their wholesale and third-party customers. Therefore, the Commission intends to launch a notice of consultation to examine how it can ensure that wholesale and third-party customers provide accurate usage data.

Conclusion

50. The Commission considers that the CSCN's recommendations (i) address the Commission's request at paragraph 51 of the Policy, (ii) are consistent with the CNA's authority and the CSCN's mandate, and (iii) will help strengthen the number assignment guidelines while supporting the preservation of numbering resources while thousand-block pooling is being implemented and once it is implemented.
51. The Commission directs the CNA to implement changes to the CO Code Assignment Guideline and the C-NRUF Guideline in accordance with the recommendations in the Report.
52. The Commission directs any carrier that has not yet submitted its usage data report to the CNA to do so by **10 October 2025**.

53. The Commission requests that the CSCN file, within **six months** of the present decision, a report containing recommendations to update Appendix A of the CO Code Assignment Guideline to reflect new number usage reporting requirements. This report should include factors to be considered by the Commission, including those for which specific recommendations may fall outside the CSCN's mandate.
54. Finally, to ensure full use of numbering resources, the Commission intends to launch a notice of consultation to examine whether and how it should leverage its authority under the Telecommunications *Act* to impose conditions on carriers, or their wholesale and third-party customers, to ensure all numbers assigned by the CNA, including those that are resold, are effectively accounted for.

Secretary General