Canadian Radio-television and Telecommunications Commission
Conseil de la radiodiffusion et des télécommunications canadiennes

Telecom Decision CRTC 2025-321

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Modification of deadline for thousand-block pooling

Summary

Telephone numbers are a finite resource and a key building block at the heart of our modern communications system. Due to the emergence of many new services in recent years (such as machine-to-machine communications and Internet of Things applications), and the continued increase in cellphone use, there is a need to conserve numbering resources in Canada.

In *Implementing thousand-block pooling,* Telecom Regulatory Policy CRTC 2024-26, 5 February 2024, the Commission directed local exchange carriers (LECs) and wireless carriers to implement thousand-block pooling (TBP) by 6 October 2025 as a way to conserve telephone numbers.

In June 2025, the Independent Telecommunications Providers Association (ITPA) filed an application with the Commission seeking a change to the 6 October 2025 deadline. The ITPA cited particular issues facing smaller carriers in implementing TBP by that time. Interveners generally agreed and recommended that TBP be implemented in stages.

In this decision, the Commission directs the Canadian Steering Committee on Numbering to create a schedule for a phased-in implementation of TBP, by exchange, with the first exchange transitioning to TBP by **28 July 2026**, and the final exchange by **28 July 2027**.

The Commission also directs LECs and wireless carriers to actively participate in developing the exchange timeline for the implementation of TBP in Canada. The Commission expects that LECs will continue working towards TBP readiness as quickly as possible.

Background

1. Telephone numbers are a finite resource and a key component of our modern communications system. Due to the emergence of many new services in recent years (such as machine-to-machine communications and Internet of Things applications), and the continued increase in cellphone use, there is a need to conserve numbering

resources in Canada. In 2023, forecasts showed that, without intervention, Canada was on track to assign its last available geographic area code[1] before 2030.

2. In response, the Commission issued *Implementing thousand-block pooling*, Telecom Regulatory Policy CRTC 2024-26, 5 February 2024 (the Policy), directing local exchange carriers (LECs) and wireless carriers to implement thousand-block pooling (TBP) as a way to conserve numbering resources.

3. TBP involves assigning numbers to telecommunications service providers (TSPs) in blocks of 1,000, rather than 10,000. Currently, TSPs are assigned central office (CO) codes[2] in blocks of 10,000 telephone numbers, and many assigned numbers remain unused. With TBP, the risk of unused numbers would be reduced.

4. In the Policy, the Commission established a deadline of 6 October 2025 for the implementation of TBP.

5. Following the issuance of the Policy, the Canadian Numbering Administrator (CNA) secured a new area code for Canada from the North American Numbering Plan Administrator, with an option to obtain additional codes as needed.

6. As a result, the most recent industry forecast[3] indicated that numbering resources are now expected to continue to be available in every geographic region in Canada for at least another 10 years.

Application

7. On 27 June 2025, the Independent Telecommunications Providers Association (ITPA), representing 21 small incumbent local exchange carriers (SILECs),[4, 5] filed

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[1] Area codes can be deemed geographic or non-geographic, depending on whether they are associated with a specific region.

[2] A CO code is the group of three digits that follows the area code in a ten-digit telephone number.

[3] See the July 2025 Numbering Resource Utilization Forecast.

[4] SILECs are legacy TSPs that continue to provide local voice services within defined operating territories, typically serving small and rural communities where they are the historical provider of last resort.

[5] The ITPA is a non-profit organization that represents 21 SILECs in Ontario, Quebec, and British Columbia to governments, their various departments and agencies,and other industry players. Members of the ITPA include Brooke Telecom Co-operative Ltd.; Bruce Telecom Ontario Inc.; CityWest Telephone and Cable Corp; Cochrane Telecom Services; CoopTel, coop de télécommunication; Execulink Telecom Inc.; Gosfield North Communications Co-operative Limited; Hay Communications Co-operative Limited; Huron Telecommunications Co-operative Limited; The Lansdowne Rural Telephone Company Limited; Mornington Communications Co-operative Limited; Nexicom Telecommunications Inc.; North Frontenac Telephone Corporation Ltd.; NRTC Communications; Quadro Communications Co-operative Inc.; Roxborough Telephone Company Limited; Sogetel inc.; Tuckersmith Communications Co-operative

an application with the Commission to modify the deadline for the implementation of TBP.

8. The ITPA acknowledged the need for conserving numbering resources but highlighted challenges small TSPs[6] faced in meeting the timeline for TBP established in the Policy.

9. The ITPA cited the following concerns:

    - Small TSPs have limited resources and capacity. While they face operational challenges that are similar to those faced by large TSPs, they lack comparable resources to implement TBP.

    - Small TSPs rely entirely on external vendors to modify network systems. Key TBP specifications and procedures are still under development, increasing the risk that work done by external resources may need to be modified or redone, which can cause additional expense. This can make it difficult for switch vendors to finalize updates and for small TSPs to move forward with implementation.

    - The ITPA and its members are minimally involved in technical planning and TBP discussions held by industry groups such as the Canadian Steering Committee on Numbering (CSCN). They have limited internal expertise and competing priorities, which limits their ability to influence or stay current with technical developments.

    - ITPA members have to date been unable to establish testing partnerships. Although testing is essential, the test exchanges designated by the CSCN are not within their service areas, leaving them without a viable testing path. Because of this, they faced difficulties complying with the deadline established in the Policy.

    - Small TSPs have no way to gauge how complex or time consuming the testing process will be, because industry testing procedures have not been completed or standardized. Currently, small TSPs cannot test TBP, which further delays readiness for TBP implementation.

10. In light of these challenges, the ITPA proposed a staggered approach to the implementation of TBP. This would require only large TSPs, or related TSP company

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Limited; La Cie de Téléphone de Courcelles Inc. (9315-1884 Québec inc.); Wightman Telecom Ltd; and WTC Communications.

[6] For the purposes of its application, the ITPA defined a small TSP as any TSP or group of TSPs that is assigned less than 1% of all CO codes, based on data from the Canadian Numbering Administration Consortium, Inc.

groups, to implement TBP in October 2025, whereas for smaller TSPs, the implementation of TBP would be delayed until October 2026.[7]

11. The Commission received an intervention regarding the ITPA's application filed jointly by Bell Canada; Cogeco Communications Inc., on behalf of Cogeco Connexion Inc.; Quebecor Media Inc.; Rogers Communications Canada Inc.; Saskatchewan Telecommunications; TELUS Communications Inc.; and Westman Media Cooperative Ltd. [collectively, the Carriers]. The Commission also received interventions from Bragg Communications Inc., carrying on business as Eastlink (Eastlink); the Canadian Telecommunications Association (CTA); and TBayTel.

Positions of parties

12. All parties agreed that delaying the TBP implementation deadline was necessary.

13. The Carriers' intervention focused on the following factors:

- Impact on consumers:
    - TBP relies on all TSPs in an exchange being technically ready for its implementation. If even one TSP in a given exchange does not implement the necessary changes, it could lead to misrouted or failed calls in that exchange, including emergency 9-1-1 calls. There could also be porting failures, duplicate number assignments, and disruption to services such as billing and texting.
- Readiness gaps within the industry:
    - Technical standards have not been fully vetted and there is a lack of comprehensive interoperability testing. Many small and medium-sized TSPs have not participated in industry testing or discussions. Vendor readiness and certification remain incomplete, delaying production testing.
- Number exhaust no longer imminent:
    - The exhaust of Canadian numbering resources is less dire than when the Commission mandated TBP in the Policy. New area codes have been secured, and others can be obtained, if needed.
- Lessons learned from the implementation of TBP in the United States:

[7] The ITPA noted that there would be an exception for small TSPs that request additional numbering resources from the CNA during that period.

- In the United States, TBP was rolled out gradually by exchange, starting with high-demand urban areas and maintaining flexibility to accommodate TSP readiness. More than 20 years later, TBP still is not in place in all U.S. exchanges, underscoring how complex the transition would be, and therefore the impracticality of implementing TBP without any phase-in period.

14. The CTA cited similar concerns about impacts on consumers and industry readiness. They called for an industry-wide extension of the deadline to October 2026, emphasizing the need for full readiness and completed testing for all TSPs before implementation. The CTA did not take a position on whether to use a phased approach as proposed by the ITPA.

15. TBayTel submitted that, based on industry readiness, it may be necessary to re-evaluate the original approach of implementing TBP without any phase-in period. The company supported a deadline extension in order to give all TSPs, regardless of size, adequate time to meet TBP requirements.

16. Eastlink supported a delay in implementing TBP for all TSPs. The company endorsed a phased implementation as proposed by the Carriers to allow for early issue resolution and a smoother national transition.

An alternative implementation plan

17. The Carriers supported a phased-in implementation but proposed an alternative model whereby, instead of being based on TSP size, TBP would be implemented by exchange. Under this model, implementation would begin in a limited number of exchanges where participating TSPs have completed testing and demonstrated readiness.

18. The Carriers submitted that the Commission should direct the CSCN to develop a schedule for implementing TBP by exchange, with the first phase focused on a small number of high-demand, high-readiness exchanges.

The ITPA's reply

19. In its reply, the ITPA indicated that it supported the alternative approach proposed by the Carriers provided that, if implemented, it addresses the issues that motivated the ITPA to file its application.

20. The ITPA added that number exhaust and TBP are important issues that must be dealt with expeditiously, but also in a manner that does not unduly prejudice any interested parties. The ITPA submitted that the proposal put forward by the Carriers strikes an appropriate balance between those concerns.

Commission's analysis

21. Given the proximity of the application date to the 6 October 2025 deadline for TBP implementation, on 2 October 2025 the Commission issued a letter[8] notifying the industry that it had decided to modify the implementation date for TBP, with reasons, and a new implementation period, to follow.

22. The Commission notes that there was a consensus among interveners that the deadline set out in the Policy for the implementation of TBP, with no phase-in period, was not feasible given the range of unresolved technical, operational, and intercarrier coordination issues, and that an extension would be necessary.

23. In view of (i) the concerns raised by parties representing a majority of impacted TSPs, (ii) the current state of industry readiness, and (iii) the potential risks to network integrity and service reliability, a review of the timeline for the implementation of TBP is warranted. Maintaining the deadline set out in the Policy might have risked a fragmented and improperly coordinated implementation, which could impact the effectiveness and stability of Canada's telecommunications networks.

24. The Commission notes that the CNA is now able to obtain new area codes as needed and that an interim measure[9] taken by the Commission has successfully reduced the consumption of CO codes by limiting the number of CO codes a TSP can be assigned. The collective result of these actions is that there are now enough numbering resources to accommodate a delayed implementation of TBP.

Phased-in implementation

25. Comments from interveners emphasized that technical interdependence between TSPs is inherent to the implementation of TBP. Successful call routing, number portability, and related systems depend on all TSPs within a given exchange being fully prepared to implement TBP and technically aligned. The Commission considers that this makes a phased-in implementation approach beneficial. A phased-in approach would promote a smoother transition and allow for course correction as needed. Furthermore, it would maintain regulatory momentum towards TBP, while ensuring that implementation is grounded in operational readiness.

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[8] *Independent Telecommunications Providers Association Part 1 Request to update the implementation of Thousand Block Pooling deadline*, Telecom – Secretary General Letter addressed to the Distribution List, 2 October 2025.

[9] *Interim measure requiring the Canadian Numbering Administrator to limit the assignment of Central Office codes to certain levels*, Telecom - Secretary General Letter addressed to Kelly T. Walsh (Canadian Numbering Administrator), 30 October 2023.

26. Two approaches to a phased-in implementation have been proposed. The ITPA initially proposed an approach based on the size of a TSP. The Carriers proposed an alternative approach based on implementing TBP by exchange.

27. The Commission is of the view that the Carriers' proposal, which is based on exchange readiness, is a more practical approach, and a better way to manage potential risk. Phasing in TBP in high-readiness exchanges where TSPs have completed testing would allow for validation of TBP processes while containing the impact of any early-stage issues.

28. Furthermore, implementing TBP by exchange reflects the way TBP operates in practice, with coordinated implementation required among all TSPs serving a given area. Such an approach would promote network stability, reduce the risk of impacts to consumers, and provide the Commission with clear checkpoints to assess progress and adjust the rollout as needed.

Modifying the deadline

29. With regard to the Carriers' proposal that the CSCN develop a schedule for a phased-in implementation of TBP based on exchange readiness, the Commission is of the view that the CSCN has access to the necessary data and is well-positioned to undertake such a task, and that it would be appropriate to request the CSCN to submit a consensus report proposing such a schedule.

30. Developing an effective implementation schedule based on exchange readiness would require the active participation of LECs and wireless carriers, as well as the ITPA, whose involvement would include consultation with its members and the provision of feedback to the CSCN. Considering the time needed for these activities, and for the necessary approvals from the CSCN and the CRTC Interconnection Steering Committee, the Commission considers it reasonable to request the CSCN to file its report by **30 March 2026**.

31. Furthermore, to maintain momentum towards TBP and to prevent indefinite delays in implementation in some exchanges, time limits should be established to provide a framework for the requested schedule.

32. To encourage the industry to begin implementing the schedule immediately, the Commission considers that the first exchange should transition to TBP no later than **28 July 2026**.

33. Based on the original ITPA request that small TSPs be given an additional year beyond the current deadline to implement TBP, the Commission considers that implementation of TBP in the final exchange(s) in Canada should occur no later than **28 July 2027.**

Participation of LECs and wireless carriers

34. The Commission notes that the CSCN recently published a TBP checklist offering LECs and wireless carriers clear guidance on the minimum requirements for TBP certifications, configurations, and both non-production and production testing necessary to achieve TBP readiness. In addition, the Canadian Numbering Administration Consortium, Inc. has appointed an independent TBP coordinator to monitor LECs' and wireless carriers' completion of the TBP checklist.

35. The Commission expects all LECs and wireless carriers to continue to work towards the implementation of TBP by completing the TBP checklist. This will provide the CSCN with information about industry readiness that, together with up-to-date data provided by the CNA, will enable the CSCN to develop a well-informed and practical timeline.

36. The Commission emphasizes that the development of a robust and feasible timeline for a phased-in implementation of TBP depends on the active involvement of all LECs and wireless carriers, regardless of size. Given the number of LECs and wireless carriers affected, participation in CSCN discussions could occur either on an individual, self-represented basis or through consolidated groups with shared representation, as is currently done by the ITPA.

Conclusion

37. In light of the above, the Commission:

    a) requests the CSCN to develop a schedule for the phased-in implementation of TBP, by exchange, taking into account CO code demand and TSP readiness, and file it for information with the Commission no later than **30 March 2026**, with:

        i. the first exchange transitioning to TBP no later than **28 July 2026**; and

        ii. the final exchange transitioning to TBP no later than **28 July 2027**

    b) directs all LECs and wireless carriers to actively participate in developing the exchange implementation timeline under the leadership of the CSCN, either individually or through consolidated groups with shared representation, and complete the implementation of TBP as detailed in the CSCN schedule; and

    c) expects that all LECs and wireless carriers will continue to actively work towards TBP readiness as guided by the CSCN's TBP checklist, as applicable.

Secretary General