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19 May 2026

Marc Morin
Secretary General
Canadian Radio-television and Telecommunications Commission
Gatineau, Québec K1A 0N2

Re: Intervention of the ATIS Industry Numbering Committee (INC) Telecom Notice of Consultation CRTC 2026-61

Dear Mr. Morin:

1. The Alliance for Telecommunications Industry Solutions (ATIS) appreciates the opportunity to provide comments in response to Telecom Notice of Consultation CRTC 2026-61 issued 2 April 2026 by the Canadian Radio-television and Telecommunications Commission (CRTC).¹ ATIS files this intervention on behalf of its Industry Numbering Committee (INC) to: (1) assist the CTRC by clarifying one point concerning the description of the U.S. numbering usage reporting framework; and (2) to express its support for maintaining Canadian and U.S. numbering administration and reporting practices that are as consistent as reasonably possible across the North American Numbering Plan (NANP).

A. Background

2. ATIS is a global standards development and technical planning organization that develops and promotes worldwide technical and operations standards for information, entertainment, and communications technologies. ATIS' diverse membership includes key stakeholders from the U.S and Canadian Information and Communications Technologies (ICT) industry – wireless, wireline, and VoIP service providers; equipment manufacturers; broadband providers; software developers; consumer electronics companies; public safety agencies; and internet service providers. ATIS is also a founding partner and the North American Organizational Partner of the Third Generation Partnership Project (3GPP), the global collaborative effort that has developed the 4G Long-Term Evolution (LTE) and 5G New Radio (NR) wireless specifications. Nearly 600 industry subject matter experts work collaboratively in ATIS' open industry committees.

¹ Telecom Notice of Consultation CRTC 2026-61, *Call for comments – Strengthening numbering usage management practices*, 2 April 2026. Public record: 1011-NOC2026-0061.

3. These comments reflect input from ATIS' Industry Numbering Committee (INC), which is the industry's open forum for addressing and developing solutions for numbering issues. INC addresses and resolves industry-wide issues associated with planning, administration, allocation, assignment, and use of the North American Numbering Plan (NANP) numbering resources within the NANP area. INC guidelines and recommendations are used by the North American Numbering Plan Administration (NANPA) and the Canadian Radio Television and Telecommunications Commission (CRTC) in the management of numbering resources.

B. A Clearer Understanding of the U.S. Reporting Framework Is Important in Considering Questions 1 and 2

In *Telecom Notice of Consultation CRTC 2026-61*, the CRTC considers whether usage data for Canadian telephone numbers obtained by third parties should be reported and, if so, to whom, how, under what circumstances, and by what mechanism this data should be reported.² ATIS INC supports effective stewardship of numbering resources and measures that strengthen accountability for the use of assigned telephone numbers and notes that a clear and precise understanding of U.S. numbering policies is needed if these policies are used as a benchmark for Canadian policy development.

4. To provide a clearer understanding of the U.S. regulatory framework governing numbering resources, ATIS INC would like to clarify a statement made in Telecom Decision CRTC 2025-252. Telecom Decision CRTC 2025-252 states that, “[i]n the U.S., “all entities holding numbering resources must report usage directly to the administrator.”³ INC respectfully clarifies that, in the U.S., numbering usage reporting obligations do not apply to every entity that may receive numbering resources downstream.

5. Accordingly, INC recommends that the record in this proceeding distinguish between entities that are directly assigned numbering resources by the North American Numbering Plan Administrator (NANPA) and therefore are subject to NRUF reporting obligations, and entities that may receive or use numbering resources through commercial or operational arrangements but are not the direct assignees. In the U.S., NRUF reporting is limited to service providers that are authorized numbering resource assignees and hold an Operating Company Number (OCN) and a Federal Registration Number (FRN), as these identifiers are required to submit utilization and forecast data to the NANPA.

6. ATIS INC believes that this clarification is important and relevant to the issues raised in the Telecom Notice of Consultation CRTC 2026-61, which build upon Telecom Decision CRTC 2025-252.

² Telecom Notice of Consultation CRTC 2026-91, Question 1 (“Should the Commission require that usage data for Canadian telephone numbers obtained by third parties be reported to the CNA?”) and Question 2 (“If the Commission were to establish such a reporting requirement, to whom, how, and under what circumstances should it apply, and when should it come into effect?”)

³ Telecom Decision CRTC 2025-252, *CISC Canadian Steering Committee on Numbering – Consensus report CNRE144B – Recommendations to strengthen the number assignment guidelines*, 26 September 2025, Public record: 8621-C12-01/08, at ¶10.

C. Importance of Consistency Across the NANP

7. INC supports maintaining Canadian and U.S. numbering administration and reporting practices as consistent as reasonably possible across the NANP, recognizing the distinct legal and regulatory frameworks that apply in each country. Greater consistency across the NANP promotes administrative clarity, reduces unnecessary complexity for service providers operating in both countries, and supports the efficient management of finite numbering resources.

8. Alignment is best advanced through accurate cross-border comparisons and measures that are clear and administratively workable. If the CRTC determines that additional requirements are appropriate for Canada, ATIS INC respectfully recommends that such measures:

- a. ensure service provider accountability for all direct and indirect numbering assignments;
- b. avoid duplicative or overlapping reporting obligations;
- c. reflect the practical ability of different entities to provide reliable usage and forecast information; and
- d. maintain the greatest feasible alignment with the U.S. and broader NANP numbering administration practices.

D. Conclusion

9. ATIS INC urges the CRTC to consider the clarification described above regarding U.S. numbering policy. While entities that are directly assigned numbering resources by the NANPA are subject to NRUF reporting obligations, not all U.S. entities with numbering resources are required to report usage to the NANPA.

10. ATIS INC supports maintaining consistent Canadian and U.S. numbering administration and reporting practices across NANP countries, recognizing the distinct legal and regulatory frameworks that apply in each country. To the extent that new Canadian requirements are adopted, ATIS INC respectfully recommends that such measures: ensure service provider accountability, avoid duplicating existing obligations, reflect the practical abilities of different entities; and maintain alignment with U.S. and broader NANP numbering administration practices.

11. ATIS INC appreciates the opportunity to provide these comments. The INC would be pleased to assist further should the CRTC choose to consider additional information regarding U.S. numbering administration practices to be useful in this proceeding.

Respectfully submitted,



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