



Telecom Decision CRTC 2026-117

PDF version

Reference: Part 1 application posted on 11 December 2025

Gatineau, 9 June 2026

Public record: 8662-J34-202506147

ISP Telecom Inc. – Application to review and vary Telecom Decision 2025-236

Summary

Telephone numbers are a finite resource and a key component of our modern communications system. Numbering administration in Canada is overseen by the Canadian Numbering Administration Consortium, Inc. (CNAC) on behalf of the Commission.

To help manage the use of numbering resources, the Commission asked CNAC to consider possible changes to its funding model. In Telecom Decision 2025-236, the Commission approved CNAC's recommendation to change the CNAC funding model in a way that encourages the preservation of numbering resources by basing CNAC fees on the amount of numbering resources companies use (the Resources Assigned funding model) rather than the revenue they earn.

In December 2025, ISP Telecom Inc. (ISP Telecom) requested that the Commission review and vary Telecom Decision 2025-236.

Review and vary applications require applicants to demonstrate substantial doubt as to the correctness of a Commission decision. They are assessed against a well-established test set out in Telecom Information Bulletin 2011-214.

ISP Telecom submitted that there was substantial doubt as to the correctness of the decision due to (i) an error of fact regarding shareholder support for the Resources Assigned funding model and (ii) the introduction of a new principle that failed to account for the effects of number portability.

Based on the record of this proceeding, the Commission finds that a substantial doubt as to the correctness of Telecom Decision 2025-236 has not been established. The Commission did not err in fact when finding that CNAC's recommendation had unanimous shareholder support, and it did not solely rely on that unanimity when it decided to approve the Resources Assigned funding model. Additionally, the decision did not introduce a new principle regarding the treatment of number portability, and it appropriately addressed the equitable allocation of CNAC funding obligations between providers. When the Commission approved the Resources Assigned funding model, it took into consideration the financial impact of the model on different categories of providers and

determined that an assignment-based model would result in a more appropriate allocation of funding responsibilities than a revenue share funding model. Any financial impact arising from the Resources Assigned funding model and number portability is mitigated by existing numbering administration processes, including section 6.3.2 of the [Canadian Central Office Code \(NXX\) Assignment Guideline](#), which allows for financial responsibility for a central office code to be transferred between providers under the Resources Assigned funding model. Any financial impacts arising from the transition to the Resources Assigned funding model will be further mitigated by forthcoming improvements to numbering administration, including thousand-block pooling.

Accordingly, the Commission denies the request to vary Telecom Decision 2025-236.

Background

1. Prior to Telecom Decision 2025-236, the operations of the Canadian Numbering Administration Consortium, Inc. (CNAC) were funded using the revenue share funding model (the Revenue Share model). Under this model, eligible entities¹ receiving telephone numbers and other numbering resources from the Canadian Numbering Administrator (CNA) contributed to CNAC's budget based on their share of overall Canadian telecommunications revenues.
2. In Telecom Decision 2025-236, the Commission approved the change from CNAC's Revenue Share model to the new resources assigned funding model (the Resources Assigned model) to help ensure that Canada's finite numbering resources are managed responsibly for the benefit of all Canadians. Under the Resources Assigned model, eligible entities' contributions are based on the amount of numbering resources assigned to them.
3. The Commission found that the Resources Assigned model would encourage eligible entities to request only the numbering resources they need. The Commission also considered that the Resources Assigned model would be more equitable and transparent because contributions to numbering administration costs would be directly tied to resource usage. Furthermore, the Commission noted that this model had received unanimous approval from the CNAC board of shareholder representatives. Most parties to the proceeding that led to Telecom Decision 2025-236 (the Proceeding) also supported this model.
4. Accordingly, the Commission directed CNAC to implement the Resources Assigned model.

Review and vary application

5. On 9 December 2025, the Commission received an application from ISP Telecom Inc. (ISP Telecom) requesting that the Commission review and vary Telecom Decision 2025-236. ISP

¹ The eligibility criteria for these entities, or "Eligible Persons", are outlined in CNAC's [Unanimous Shareholders' Agreement](#). Eligible entities include incumbent local exchange carriers, competitive local exchange carriers, independent telephone companies, Canadian international carriers, interexchange carriers, and wireless service providers.

Telecom submitted that there was substantial doubt as to the correctness of the decision due to an error of fact regarding shareholder support for the Resources Assigned model and the introduction of a new principle with respect to the treatment of number portability under that model.

6. Specifically, ISP Telecom submitted that, as a CNAC shareholder, it did not support the model, and that CNAC therefore inaccurately conveyed unanimous shareholder endorsement for the Resources Assigned model in the Proceeding. ISP Telecom explained that the Commission's reliance on this characterization was a finding of fact that created substantial doubt as to the correctness of the decision.
7. ISP Telecom also submitted that the Resources Assigned model introduced a new principle because it fails to account for number portability. It added that, under current industry practices, wholesale service providers may remain financially responsible for numbering resources that have been ported to competitors despite no longer deriving any associated revenue. ISP Telecom explained that this outcome is inconsistent with principles of cost causality and fairness.
8. ISP Telecom therefore requested that the Commission (i) suspend the use of the Resources Assigned model while it reviews ISP Telecom's application and (ii) rescind Telecom Decision 2025-236 in its entirety. Alternatively, ISP Telecom suggested that the Commission suspend Telecom Decision 2025-236 and require CNAC to develop and file an application for a revised funding model that explicitly and equitably accounts for number portability.
9. The Commission received interventions from: Bell Canada; Bragg Communications Inc., carrying on business as Eastlink (Eastlink); CNAC; Fibernetics Corporation (Fibernetics); Iristel Inc. (Iristel); Quebecor Media Inc., on behalf of Videotron Ltd. (Quebecor); Rogers Communications Canada Inc. (Rogers); and TELUS Communications Inc. (TELUS).

Review and vary criteria

10. Under section 62 of the *Telecommunications Act* (the Act), the Commission can review and, if necessary, vary its decisions.
11. The Commission can use this authority, either on application or on its own motion, to revisit a past decision and make changes to correct any errors or oversights, or to reflect changed circumstances.
12. The Commission's framework for assessing review and vary applications is set out in Telecom Information Bulletin 2011-214. This is a well-established framework that contributes to regulatory certainty and predictability by allowing the Commission to revisit a past decision and make corrections for any errors, oversights, or changes in circumstances.

13. Based on the record before it, the Commission assesses whether there is substantial doubt as to the correctness of the decision. If there is a substantial doubt, the Commission can consider varying a decision.
14. The Commission will typically assess whether an applicant has established substantial doubt resulting from:
- an error in law or in fact;
 - a fundamental change in circumstances or facts since the decision;
 - a failure to consider a basic principle which had been raised in the original proceeding; or
 - a new principle that has arisen as a result of the decision.

Issues

15. The Commission has identified the following issues to be addressed in this decision:
- Did the Commission make an error in fact regarding CNAC's unanimous shareholder approval?
 - Did the decision introduce a new principle with respect to the treatment of number portability under the Resources Assigned model?

Did the Commission make an error in fact regarding CNAC's unanimous shareholder approval?

Positions of parties

Interveners

16. Bell Canada, CNAC, Quebecor, Rogers, and TELUS all opposed ISP Telecom's application.
17. CNAC disputed the claim of factual error regarding shareholder support. It indicated that ISP Telecom has direct representation in the CNAC board of shareholder representatives as per CNAC's [Unanimous Shareholders' Agreement](#). CNAC added that the Resources Assigned model was unanimously approved by the representatives present at a duly called meeting, and that ISP Telecom's absence from that meeting was not indicative of its disapproval. Nevertheless, CNAC acknowledged that its reply could have been more precise, because it referred to CNAC shareholders rather than shareholder representatives at a meeting of the Shareholder Representatives Board.

18. CNAC, supported by Quebecor and Rogers, added that ISP Telecom was provided fair notice and opportunities to participate in the multiple review and approval meetings that were held. However, ISP Telecom did not attend, nor did it raise any objections through the relevant processes.

ISP Telecom

19. In its reply, ISP Telecom submitted that CNAC itself admitted that its description of the approval process for the Resources Assigned model could have been more precise. ISP Telecom added that CNAC described the model as having been unanimously approved by shareholders rather than the shareholder representatives who attended the meeting. ISP Telecom submitted that this detail was significant because CNAC did not disclose that some shareholders were absent, creating the impression that the model had full shareholder support, which the Commission relied on to arrive at Telecom Decision 2025-236.

Commission's analysis

20. In their respective submissions, CNAC and Rogers confirmed that ISP Telecom, like all CNAC shareholders, was notified and invited to participate in the approval meeting for the Resources Assigned model. These facts were not disputed by ISP Telecom. While CNAC acknowledged that its wording regarding unanimous approval could have been more precise, the Commission does not consider that there was any material error in its characterization of the unanimous nature of the vote.
21. Furthermore, the Commission notes that ISP Telecom had the opportunity to raise its concerns about the Resources Assigned model and CNAC's characterization of unanimity during the Proceeding, but failed to participate.
22. In light of the above, the Commission considers that ISP Telecom's absence from CNAC's approval meeting does not establish that the Commission erred in fact when it noted in Telecom Decision 2025-236 that the Resources Assigned model received unanimous approval from the CNAC board of shareholder representatives.²

² Telecom Decision 2025-236, paragraph 31.

Did the decision introduce a new principle with respect to the treatment of number portability under the Resources Assigned model?

Positions of parties

Interveners

23. Iristel supported ISP Telecom's position, namely that the outcome of the Resources Assigned model is inconsistent with the principles of fairness and cost causality and will disproportionately impact competitive local exchange carriers (CLECs). Fibernetics also supported the relief sought by ISP Telecom, submitting that reforming the Revenue Share model through stronger enforcement and simpler administration would be a better option than adopting the Resources Assigned model.
24. Eastlink indicated that it shared some of ISP Telecom's concerns regarding the equity of the Resources Assigned model but was more concerned with the delayed implementation of thousand-block pooling (TBP). Eastlink submitted that the Resources Assigned model was developed on the assumption that TBP would be implemented in October 2025. However, with implementation now delayed until July 2027, per Telecom Decision 2025-321, providers must continue to request numbering resources in 10,000-number blocks. Eastlink claimed that implementing a Resources Assigned model before TBP will result in substantially higher fees for providers, which will need to request and hold on to excessive numbering resources that will need to be returned once TBP is implemented.
25. Bell Canada, CNAC, Quebecor, Rogers, and TELUS submitted that number portability long predates Telecom Decision 2025-236 and is therefore neither a new nor a previously overlooked principle. They further stated that the decision to allocate costs based on assigned resources rather than usage or revenue was a deliberate policy choice. According to Rogers, while providers could lose customers through number portability, they could also gain customers without incurring additional CNAC costs. It added that any mismatch between assignment and revenue generation is inherent to the Resources Assigned model's design and that number porting does not undermine its equity or efficiency. CNAC also submitted that ISP Telecom failed to provide any evidence as to the tangible effects number portability would have on the fees CNAC charges to eligible entities.
26. More broadly, parties that opposed ISP Telecom's application submitted that it failed to meet the legal threshold for review and variance under section 62 of the Act. They further submitted that the Resources Assigned model is administratively simpler and more efficient than the Revenue Share model, and that it better advances numbering conservation objectives.

ISP Telecom

27. In its reply, ISP Telecom specified that while number portability itself is not new, its interaction with the Resources Assigned model gave rise to a separate new principle not addressed in the Proceeding. Specifically, ISP Telecom questioned whether it is appropriate for a carrier to be

responsible for the cost of numbering resources it no longer uses, controls, or monetizes due to porting dynamics. It added that, under the Revenue Share model, when numbers were ported out and revenues declined, a carrier's CNAC contribution decreased proportionally, which preserved cost causality. By contrast, the Resources Assigned model ties contributions to assigned numbering resources regardless of actual use or revenues generated, eliminating this automatic adjustment mechanism. ISP Telecom submitted that this design creates a structural disadvantage for providers experiencing more numbers being ported out than ported in, particularly CLECs and wholesale providers, such that they may not realize the full financial benefits associated with any number ported to another eligible entity. ISP Telecom submitted that, therefore, the specific interaction between number portability and the Resources Assigned model was not substantively examined in the Proceeding.³

Commission's analysis

28. While the Commission acknowledges that number portability was not expressly referenced in Telecom Decision 2025-236, the Commission did assess the implications of adopting a Resources Assigned model, including equity, impacts on small providers, and the change from a revenue-based funding mechanism.
29. In paragraphs 37 to 40 of Telecom Decision 2025-236, the Commission examined the equity and proportionality of the Resources Assigned model and its impacts on different categories of providers. The Commission recognized that the model could disproportionately burden certain providers but noted that some large providers had been contributing less under the Revenue Share model than they would be under the Resources Assigned model. In fact, certain larger providers' contributions would increase, while certain smaller providers would see a reduction. The Commission further noted that, under the Resources Assigned model, eligible entities' contributions would be solely based on numbering resources allocated to them rather than revenues derived from those resources. In adopting that model, the Commission determined that funding responsibility would track assignment rather than revenues generated. Accordingly, the fact that number portability may cause a misalignment between assigned resources and realized revenues is a structural and foreseeable feature of the Resources Assigned model's design rather than a new principle arising as a result of Telecom Decision 2025-236.
30. The Commission recognizes that the current numbering framework, under which the CNA assigns numbers in blocks of 10,000, can, in some cases, make it challenging to identify a single recipient for the transfer of a central office (CO) code. However, the Resources Assigned model is designed to accommodate evolving industry practices such as the transition to TBP.

³ ISP Telecom cited, for example, the common occurrence where a reseller obtains large blocks of telephone numbers from a wholesale service provider. ISP Telecom explained that the reseller may later move its traffic to another wholesale provider, porting thousands of numbers at once, causing a situation where the original wholesale provider no longer generates any revenue from the numbering resources but maintains the associated funding obligations.

Additionally, the Commission is currently considering modifications to the [Canadian Central Office Code \(NXX\) Assignment Guideline](#) (CO Code Guideline) to reflect this transition. The Commission therefore considers that the anticipated move to TBP will improve the assignment and reallocation of numbering resources, making it easier to identify the appropriate eligible entity and transfer responsibility to it to better reflect actual use.

31. With respect to Eastlink's concern that delays in implementing TBP create a conflict with the Resources Assigned model, the Commission notes that these timelines did not factor into the Commission's analysis and approval of that model. In Telecom Decision 2025-236, references to TBP are limited to CNAC's view that the Resources Assigned model is inherently more flexible and better suited than the Revenue Share model to adapt to evolving industry conditions.⁴
32. With respect to ISP Telecom's submission regarding providers being responsible for the cost of numbering resources they no longer use, control, or monetize due to porting dynamics, the Commission is of the view that such circumstances are sufficiently mitigated through existing numbering administration processes that predate Telecom Decision 2025-236. In particular, section 6.3.2 of the CO Code Guideline establishes a mechanism for the transfer of a CO code from one holder to another. Where a CO code holder determines that a substantial volume of numbers has been ported out, such that continued financial responsibility under the Resources Assigned model is no longer reasonable, it can assign responsibility for that CO code to another eligible entity.
33. In light of the above, the Commission considers that Telecom Decision 2025-236 does not establish a new principle with respect to the treatment of number portability under the Resources Assigned model. The Commission is of the view that the decision appropriately addresses the equitable allocation of funding obligations among eligible entities. The effects of number portability are neither unanticipated nor sufficiently material and instead represent a structural feature of the approved Resources Assigned model. The Commission also notes that existing and forthcoming numbering administration processes provide adequate mechanisms to address any misalignment between assigned resources and financial responsibility.

Conclusion

34. In light of all of the above, based on the record of this proceeding, the Commission finds that the applicant did not establish a substantial doubt as to the correctness of the original decision. The Commission therefore denies, by majority decision, ISP Telecom's application to review and vary Telecom Decision 2025-236.

Secretary General

⁴ Telecom Decision 2025-236, paragraph 17.

Related documents

- *Modification of deadline for thousand-block pooling*, Telecom Decision CRTC 2025-321, 28 November 2025
- *Canadian Numbering Administration Consortium, Inc. (CNAC) – Application requesting approval for a change to the funding model used by CNAC for numbering administration purposes*, Telecom Decision CRTC 2025-236, 10 September 2025, as amended by Telecom Decision CRTC 2025-236-1, 10 November 2025
- *Revised guidelines for review and vary applications*, Telecom Information Bulletin CRTC 2011-214, 25 March 2011