

October 21, 2005

Ms. Diane Rhéaume
Secretary General
Canadian Radio-television and
Telecommunications Commission
Ottawa, ON
K1A 0N2

Dear Ms. Rhéaume:

RE: Telecom Public Notice CRTC 2005-14 – Implementation of wireless number portability

1. The Canadian Wireless Telecommunications Association (CWTA or the Association) is in receipt of Reply Comments from the Public Interest Advocacy Centre (PIAC), dated October 17, 2005 in the above noted proceeding.
2. At paragraph 6 PIAC states:

PIAC notes that most carriers have suggested that they will absorb costs associated with this change. That is, WNP will become an “operating cost” and that there will be no (monthly or one-time) charge to consumers for WNP.
3. In the same section, PIAC references SaskTel’s Comments of October 6 with respect to that carrier’s discussion of the recovery of costs associated with the admission of wireless carriers to the CLNPC.
4. While the Association has no role regarding the pricing decisions of its members, it is apparent to CWTA that PIAC has taken the discussion of CLNPC costs out of context. As a result, the conclusion drawn by PIAC in paragraph 6 that “... *there will be no (monthly or one-time) charge to consumers for WNP*” may not, for the record, be an accurate interpretation of carriers’ future intentions in this regard.
5. Moreover, in CWTA’s interpretation of the filed comments of the wireless carriers, it is certainly not accurate to state that “... *carriers have said that they will absorb costs associated with [WNP implementation]*”. CWTA suggests that wireless carriers will individually make decisions regarding if, and how, they will recover costs of implementing WNP. In this regard, the CWTA observes that the Commission does not subject wireless carriers to price regulation and it is the

position of CWTA that forbearance from price regulation should continue to apply in the case of WNP.

6. The CWTA notes that information on the Federal Communications Commission's (FCC) WNP website may be helpful to parties in providing a more accurate record of wireless carriers' options vis-à-vis charging customers for WNP. The FCC's website contains the following consumer information concerning pricing practices in that jurisdiction with regard to wireless carriers' options concerning cost recovery:

Are carriers allowed to charge for number porting, and, if so, how much can the charges be?

Carriers are allowed to recover their costs of implementing wireless LNP by charging fees to customers. They have been allowed to do this in advance of the LNP deadline because they have been incurring costs for LNP upgrades in preparation for the deadline.

Carriers may recover their costs either by including line-item fees for LNP on their customers' monthly bills or by raising the monthly rate. Carriers that have been adding line items to consumer bills to recover LNP costs have typically been charging from a few cents to a little over a dollar.

Carriers are also allowed to charge a fee to customers at the time their number is ported. However, there are no rules preventing a new carrier from paying an old carrier's porting costs for the benefit of the new customer. You should ask the new carrier whether it has a policy of paying or reimbursing such charges.

7. CWTA believes that, in the interest of creating an accurate record, it is important that parties have a common understanding of wireless carriers' options in this regard.

Sincerely,

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J. David Farnes
Vice President,
Industry and Regulatory Affairs

cc: Interested Parties

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