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Mr. Charles Dalfen
Chairman, Canadian Radio-television and
Telecommunications Commission
Ottawa, Ontario
K1A 0N2
Charles.dalfen@crtc.gc.ca

ENUM

Dear Mr. Dalfen,

I am writing you in connection with the forthcoming introduction of the ENUM protocol in Canada, which will have significant effects on the Canadian telecommunications and domain name market place, as well as on how people live and communicate.

ENUM is a protocol that allows the mapping of the telephone system onto the Internet. While I do not profess fundamental technical understanding at the protocol level, I am aware that ENUM will allow a translation of a telephone number, described in the jargon as an e.164 number, into the functional equivalent of a domain name.¹

Putting in terms I relate to better, the software of telephone numbers is about to be modified and absorbed into the standard software for locating all Internet-based resources: phones, faxes, or anything else capable of being located.

ENUM was developed as a solution to the question of how to find services on the Internet using only a telephone number, and how telephones, which have an input mechanism limited to twelve keys on a keypad, can be used to access Internet services.²

It follows that the economics of production and distribution of telephone numbers will need to be looked at from the point of view of these new technical possibilities. For instance, telephone numbers are assigned in the North American Numbering Plan Administration (NANPA) as a centralized resource. Though domain names are organized with some measure of central control, through a registry, but they are also the subject of a vigorous competition at the retail and

¹ <http://www.itu.int/osg/spu/enum/>

² <http://www.enum.org/>

wholesale level, with dozens upon dozens of companies managing domain name storage, retrieval, transfer, creation, resale and extinction.

As with all of these questions arising from convergence – and here the term is used exactly - questions arise for regulators and those concerned with competition policy. How will the new industry of domain names and the old manner of telephone number assignment relate to one another? Which model will prevail? Which serves the public interest better? What elements are inescapably monopolistic and which can be competitive?

For instance, North America and the Caribbean outside of Cuba are within the North American Numbering Plan, which is denoted by the “1” before long distance calls. This is centrally administered, if I recall correctly, by Neustar out of Reston, Virginia. When ENUM is introduced, who should continue to be the registry of Canadian telephone numbers? Should a Canadian telephone numbering registry exist? Doubtless other parties will think of other issues pertinent to them, if they are asked.

My essential point is that the CRTC, in conjunction with other agencies of government, CIRA, the telecommunications industry, the domain name industry, and other interested parties, need to start thinking in an organized way about the industry structure-competition issues that will arise from the introduction of ENUM. Unless we do, we may head on autopilot towards some unnecessarily restrictive outcomes.

The second issue concerns the roles and functions of CIRA (the Canadian Internet Registration Authority), CISC, and the Commission in the management of the industry structure about to be created.

I suggest that a public notice process would be the right way to proceed, insofar as it offers a public opportunity for considered responses from the interested parties in the domain name and telecommunications industries. Thanking you for your consideration of these ideas, I am

yours sincerely,

A handwritten signature in black ink that reads "Timothy Denton". The signature is written in a cursive, flowing style.

Timothy Denton

Copies to
Michael Binder, ADM SITT
Bernard Turcotte, President of CIRA