

# **M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON NET NEUTRALITY**

**27 December 2010**



This paper is prepared in response to IDA's consultation document dated 11 November 2010 and represents M1's views on the subject matter. Unless otherwise noted, M1 makes no representation or warranty, expressed or implied, as to the accuracy of the information and data contained in this paper nor the suitability of the said information or data for any particular purpose otherwise than as stated above. M1 or any party associated with this paper or its content assumes no liability for any loss or damage resulting from the use or misuse of any information contained herein or any errors or omissions and shall not be held responsible for the validity of the information contained in any reference noted herein nor the misuse of information nor any adverse effects from use of any stated materials presented herein or the reliance thereon.

## **M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON NET NEUTRALITY**

1. M1 is a leading integrated communications service provider in Singapore, providing a full range of voice and data communications services over its network. Since 1 Apr 1997, M1 has made significant inroads into the local mobile communications market, gaining considerable brand presence and market share. In 2000, we launched our international telephone services and in February 2005, M1 took the lead in launching 3G services in Singapore. M1 was also the first to launch Singapore's first true island-wide wireless broadband service, M1 Broadband Service, in 2006. We became a full-fledged broadband player with the introduction of M1 Fixed Broadband service in 2008, transforming M1 from a single-play mobile operator to a dynamic multi-play operator, with interests in both the mobile and fixed sectors. On 1 Sep 2010, M1 launched its high-speed fibre broadband service of up to 1 Gbps on the new national fibre network and fixed voice service.

2. M1 welcomes the opportunity to provide our comments on IDA's consultation paper on Net Neutrality. We believe in responsible usage of available resources coupled with efficient management of these resources which are necessary to deliver a consistent, reliable and quality broadband experience to safeguard the interests of all customers.

3. We are supportive of IDA's existing policy position and approach towards net neutrality. These have adequately addressed any potential issues associated with net neutrality and prevented any potential anti-competitive behaviour that may impact consumer interests. As the open internet has flourished under the precepts of global market forces into a highly dynamic environment which is vigorous in competition and rich in innovations, the most appropriate course for public policy is not to intercede except in the limited scenarios where competition or consumers are demonstrably harmed. Hence, M1 proposes no change to the current policy position/approach, but to continue to monitor developments across the Internet value chain.

4. M1 would also like to emphasize the importance of exercising discernment in addressing public feedback to ascertain if it was a cause for imposition of regulatory requirements or a need for better public education to enable understanding and appreciation of the market, technology and environment which the respective telecommunication services operate.

5. It is common industry knowledge that an array of parameters affects speed and delivery of internet traffic. Some of these are listed as follows:

- a. Distance between home or premise and local phone exchange. The greater the distance from exchange, the slower the connection.
- b. The number of computers sharing the broadband connection. The higher the number, the slower the connection.

- c. Hardware configuration of users' Personal Computer ("PC") or laptop eg. computer processing speed and power supply would also impact internet connection.
  - d. Software configuration of user's Personal Computer ("PC") or laptop eg. the type of operating system, simultaneous usage of multiple applications etc.
  - e. Type of websites eg. local or overseas. Not all the websites will offer the same speed of download, no matter how fast the connection is. Internet works by sending data through a chain of connections between the end user, internet service providers and the websites to be reached. There may be many factors on any of the links between all these points or connections which may affect the connection speed.
  - f. Web server speed of the website also affects the speed of connection or how fast the broadband network can receive the data.
  - g. Time of the day. During peak periods of access, one may experience slower connection as more people are accessing the Internet and the maximum speed would be limited because everyone on the exchange or in a specific area is using the same bandwidth at the same time.
  - h. Viruses, spy-wares, and file sharing softwares can also slow down internet connections.
  - i. The type of modem/router, filters, phone cables, and connections of routers etc. may also affect the speed of internet connection. For example, long extension cable running from broadband modem into the telephone jack may impact broadband connection.
  - j. For home or office networks, broadband connections may also be affected by other programs or users downloading or uploading files. These activities may "saturate" the bandwidth and slow down other internet activities such as email or web browsing.
6. Evident from the above list, there are too many variables affecting the broadband internet connections and these are all beyond the Internet Service Provider's ("ISP's") control. The case for mobile broadband is even more complicated due to the "open and exposed" environment and dynamic mobility nature of the service whereby more external factors such as atmospheric conditions, interferences and building obstruction or clutters would impact internet connections. Furthermore, internet connections could well be affected by a combination of factors instead of a single factor. Hence, the many variables or combination of variables make it impossible for any party to accurately and objectively

define “average Internet access speed” or provide “expected Internet access speed”. In fact, any attempts to do so would be highly misleading and subject to manipulations or provision of false or distorted information. Hence, M1 strongly object to IDA’s proposal of ISPs stating “average Internet access speeds” or “expected Internet access speeds” because there is basically no sound, objective, and equitable basis to do so considering the many variables involved. Instead, M1 suggests improving public education on broadband internet services and we would be supportive of IDA initiatives or joint industry efforts on this.

7. In summary, M1 proposes:

- No change to existing policy position or approach on net neutrality;
- No publication of misleading information such as “average Internet access speed” or “expected Internet access speed”; and
- Improve public education on broadband internet services, thereby raising the level of understanding on factors affecting the provision such telecommunication services.