

15 December 2010

INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

Attn: Aileen Chia (Ms)
Deputy Director-General (Telecoms & Post)

Dear Madam

MORATEL'S COMMENTS: NET NEUTRALITY

We refer to the consultation paper issued by IDA on 11 November 2010. We would like to offer our comments on the topic.

On "Blocking of legitimate Internet content" and "Niche or Differentiated Internet Services Allowed"

The growth of many niche and differentiated Internet services (eg, VoIP) depends greatly on network effect—the value of a product or service increases as more people use it. If a user's experience of the service is positive, s/he is likely to encourage his/her peers to sign on and grow the service.

IDA's paper has correctly identified network management on Internet traffic as one of the techniques that operators may employ to discriminate against innovative Internet services that have potential to become future competitors. It is thus not sufficient to prohibit "blocking of legitimate Internet content". Operators should also be prevented from degrading/throttling access to ensure a fair competing environment for these niche and differentiated services to grow. If discrimination has to be employed, customers should be advised of the reasons and their alternatives.

On "Provid(ing) Information Transparency"

Moratel agrees that operators may employ network management to provide a reasonable quality of Internet access service for all users. However, operators should increase transparency in this regard by communicating the techniques employed; eg, rate-limiting (dropping of excess traffic), or shaping/throttling (queuing). End-user applications respond differently to the various outcomes of network management (eg, lost traffic v higher latency). Making available details of the network management techniques employed will provide for more informed end-users.

On "Comply(ing) with Competition & Interconnection Rules"

It is disheartening that despite much investment in the SGIX to grow Singapore to be a dominant Internet-peering domain for the region, none of its founding members are peering openly on or at all connected to the Exchange. At best, the peering policy adopted is Selective (M1 and 1-Net) and the first connected member on board had to be a foreign operator (PT Mora Telematika Indonesia/Moratel).

Despite bringing Indonesian traffic at its cost to Singapore's doorstep, local routes are jealously protected and none of the incumbents (SingTel, StarHub, and Pacnet) would agree to peer with Moratel and to exchange local routes. We cannot imagine the plight of smaller

SBOs who have much less to offer. It is embarrassing that local Singapore traffic would have to turn international, and be transported and exchanged at overseas neutral peering points such as those in Hong Kong and Japan.

Moratel feels that this is against the spirit of Net Neutrality and IDA should require all SBO/FBO-licensed operators to share local routes.

For your kind consideration.

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For and on behalf of Moratel International Pte Ltd