

Attn: Jason Bay

Director, Economic Regulation Division
Ministry of Communications and Information
140 Hill Street
Singapore 179369



**MYREPUBLIC LTD OFFICIAL RESPONSE TO
PUBLIC CONSULTATION PAPER ISSUED BY
THE MINISTRY OF COMMUNICATIONS AND INFORMATION
REVIEW OF THE TELECOMMUNICATIONS ACT (Cap. 323) AND
RELATED AMENDMENTS TO THE MEDIA DEVELOPMENT
AUTHORITY OF SINGAPORE ACT (Cap. 172)**

19 August 2016

Submitted by:

Fabian Lau
Communications Manager, MyRepublic Singapore
Email address: fabian@myrepublic.com.sg
Mobile contact: 9007 3930

On behalf of MyRepublic Ltd

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Part I: Summary of Major Points

- MyRepublic is strongly supportive of the proposed changes to the telecommunications act, and agrees that these changes will improve deployment, regulation, clarity, and dispute resolution of the telecommunications sector.
- MyRepublic hopes that that MCI also extend rent-free regulations to:
 - common infrastructure installations such as lamp posts and AG Boxes, in light of current and potential deployment of small base stations to provide mobile coverage in Singapore.
 - cover not just the mobile base stations sited on the Mobile Deployment Space (MDS) but also the area taken up by the necessary connecting equipment, such as cable trays and cables.
- MyRepublic is also supportive of the changes to dispute resolution between land/building owners and telecommunications licensees seeking access to rooftops for base station installation, and the proposed 14 day timeframe to inform IDA of any objections.

Part II: Statement of Interest

MyRepublic is a Singapore-grown startup that provides fibre broadband to over 50,000 homes and businesses. It is best known for launching Singapore and South Asia's first 1Gbps fibre broadband plan under S\$50.

In 2015, MyRepublic made headlines when it announced its interest to become Singapore's 4th mobile operator license and bring unlimited mobile data plans to the market. It will be submitting an Express of Interest to IDA at the end of August 2016.

As a disruptive and innovation-driven telecommunications company aspiring to be a next-gen mobile operator, MyRepublic and its subscribers will be directly impacted by the changes to the Telecommunications Act. The company therefore would like to provide the following comments to these proposed changes, as part of MCI's public consultation process.

Part III: Comments on Proposed Changes by MCI to the Telecommunications Act

Question 1: MCI invites views and comments on the proposal to revise Sections 19 and 21 of the TA to provide IDA with the powers to establish a framework to regulate and facilitate the use of/access to rooftop space for mobile deployments

MyRepublic strongly supports the proposed changes to Sections 19 and 21 of the TA, and is in full agreement that it will greatly boost deployment of service coverage and delivery in Singapore.

MyRepublic would also like to make the following recommendations to further enhance deployment of mobile coverage:

1. That MCI considers extending rent-free regulations to common infrastructure capable of carrying mobile cell equipment, such as lamp posts, AG Boxes, NParks buildings and monopoles on state land.

Currently, the telecommunications industry already leverages such infrastructure to deploy base stations on such infrastructure in order to provide additional coverage or capacity in localized areas. During the 9 month HetNet Trial with IDA, MyRepublic also successfully deployed small cells on street-side and road-side lamp posts, to provide coverage for a larger area, leveraging the Nationwide Broadband Network for backhaul.

Small cell deployment on common infrastructure would be the next step in providing cost-effective, high capacity mobile cell coverage for mobile data users. If

2. That MCI considers extending rent-free rooftop regulations to cover not just the mobile base stations sited on the Mobile Deployment Space (MDS) but also the area taken up by the necessary connecting infrastructure and antennae, such as cable trays/ladders, trunking and antennae booms.

Though this infrastructure is unobstructive and necessary for the base stations to function, there

have been instances where building owners insist on charging additional rental based on the space it occupies.

Question 2: MCI invites views and comments on the proposal to amend Sections 14 and 21 of the TA to clarify the notification and objection process for telecommunication licensees' entry to land/buildings.

MyRepublic strongly supports the proposal to amend Sections 14 and 21 of the TA, and believes that it will greatly improve clarity on the responsibilities of operators and land/building owners when deploying mobile coverage.

Additionally, the 14-day timeframe adds urgency to requests made to land/building owners, and will lead to swifter deployment of mobile coverage in the future.

Question 3: MCI invites views and comments on the proposed inclusion of the new Section 21A of the TA to provide IDA the powers to prohibit exclusive arrangements that deny end-users' choice of, or access to, telecommunication services.

MyRepublic agrees with and supports empowering IDA to prohibit exclusive arrangements that deny end-users' choice of telecommunications services.

Question 4: MCI invites views and comments on the proposal to revise Section 2 of the TA to incorporate the definition of "owner" and to make it clear that such "owner" includes person(s) having the day-to-day charge, management or control of the premise, land or building.

MyRepublic agrees with the clarified definition of "owner".

Question 5: MCI invites views and comments on the proposed inclusion of the new Part VC of the TA and corresponding changes to the MDAA to provide IDA and MDA with the powers to establish an ADR scheme for the telecommunication and media sectors.

MyRepublic agrees with and supports the establishment of the proposed ADR scheme.

MyRepublic also recommends that the organisations employed in the ADR scheme have sufficient experience and/or knowledge of the relevant industry and its operations. The telecommunications sector is understandably complex, and insufficient knowledge of its operations might lead to unsatisfactory mediation for parties involved.

Question 6: MCI invites views and comments on the proposed amendments in relation to the new Section 32DA and Sections 32F, 64(1), and 69 of the TA as described above.

MyRepublic agrees with and supports the change to Section 64(1) of the TA, and concurs that the increase in the maximum Compoundable Amount will deter future occurrences of cable cut incidents and other compoundable offences under the TA.

Question 7: MCI invites views and comments on the proposed amendments in relation to the new Section 11A, and Sections 2, 5, 5B, 8, 26, 32D, 33(1), and 74 of the TA as described above.

MyRepublic has no comments for these proposed amendments to the TA.

Part IV: Conclusion

As a fibre broadband provider and aspiring mobile operator, MyRepublic is heartened to see the proposed improvements that are planned for the TA. The company believes that this is indicative of MCI's dedication to ensure that consumers are fairly protected and obligates the telecommunications industry to continuously improve their services. The direction of these changes will also further Singapore's progress to achieve the Smart Nation vision.

MyRepublic supports these proposed changes and look forward to their implementation.