

To: MCI TA Public Consult2016 (MCI) <TA_Public_Consult2016@mci.gov.sg>

Subject: Public Consultation of the Review of the Telecommunications Act and Related Amendments to the Media Development Authority of Singapore Act

Dear Sir,

The key issue is GFA.

GFA will be an issue, unless we can have URA approval to be exempted from GFA for the room required by the telco service providers. IDA shall vet through and approve the size of the room required by the telco service providers for an appropriate size and not asking for oversized space required. For space requirements, we like to have a direct discussion with IDA to agree on space requirements

In addition please refer to our comments/questions as follows:

1. Will there be a cap to the number of mobile operators who can install their equipment on each building site? Concerns include:
 - a. Is rooftop equipment layout considered GFA to the building owner? If so, where does building owner who has already maximized its building GFA find the additional GFA to house the mobile equipment?
 - i. Some buildings, especially in the Marina Bay Area, are strictly controlled by URA (and other relevant authorities) in terms of usage, façade and GFA. Any deviation to the original approved plans require a Qualified Person's submission to the relevant authority. Who will be paying for the professional fees of consultants and authority submission fees?
 - b. Unsightly layout of equipment at rooftop. Who has the ultimate control over the layout of mobile equipment on the rooftop so as to maintain the integrity of the building design, access around and cleanliness of the areas?
 - c. Which party will pay for the maintenance of the mobile equipment?
 - d. Who will pay for the electricity/power usage of mobile equipment?
 - e. Who will pay for the legal/professional fees in negotiating agreements between mobile operators and building owner?
2. Some buildings are built to its maximum height allowable under the URA guidelines. Any further addition on top of building rooftop will essentially be beyond allowable height limit. Concerns include:
 - a. Will the mobile operators conduct their due diligence prior to approaching the building owners? (ie: will the mobile operators approach the relevant authorities to apply for all relevant waivers and conduct all relevant consultations prior to approaching the building owners?)
 - b. Will the mobile operators be seeking approval from the relevant authorities to vary the building height? Some relevant authorities will include URA, DSTA and CAAS, to name a few.
3. Certain rooftops are already built up to the max GFA/layout without becoming a "habitable floor". A "habitable floor" will require FSSD and other relevant authorities' approval. Whose obligations is it to go to the authorities for approvals, bear the professional and submission costs, and eventually be responsible for maintaining the "habitable floor" (maintenance, manpower, electricity bills, etc.)?

4. Should additional GFA be allowed by URA, who will bear the costs of Development Premium to SLA?

Thank you.

Best regards

Raymond KOH

Vice President of Facilities

Marina Bay Sands Pte Ltd

DID: +65 6688 0401 | Mobile: +65 9456 8139

raymond.koh@marinabaysands.com

10 Bayfront Avenue, Singapore 018956 | Marinabaysands.com

Follow us on [Facebook](#) | [LinkedIn](#) | [Instagram](#)