

PUBLIC CONSULTATION OF THE REVIEW OF THE TELECOMMUNICATIONS ACT AND RELATED AMENDMENTS TO THE MEDIA DEVELOPMENT AUTHORITY OF SINGAPORE ACT

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1 Summary of major points

We welcome MCI's initiative to review the existing policy and legislation frameworks to ensure accessibility to telecommunication services.

We wish to provide the following feedback:

1. Allow for balance approach, in that a regulated market rate to be charged for usage of areas with equipment that mainly serves other properties.

Under the current framework, MDS is meant to provide mobile coverage within the development. This new proposal allows for more deployment areas including rooftops which will increase mobile coverage in areas outside the building. This will lead to multiple operators seeking permission and can become a repetitively administrative process without any reimbursement of management time to building owners.

We suggest for COPIF to be amended such that a regulated market rate is charged for usages of areas with equipment that mainly serves other properties. This would be a balanced approach instead of without any charge or leaving it to free market.

2. Require costs sharing for relocation of telecommunication installations

Currently, under the current Telecommunications Act¹, public telecommunication licensees may require owners or occupier of land or building to pay for the costs and expenses to relocate the telecommunication installations in the event of a building being slated for redevelopment. Since the regulated COPIF usage is largely free, the costs of relocation should be mainly borne by the licensees. If not, building owners will provide not only free space but also costs of relocation when the telco operators would be benefitting without much outlay. Further, the relocation costs could be high if the operator connection nodes are a distance away.

¹ Telecommunication Act Section 17 (3)

3. Use of Roof-top for Mobile Deployment to Require Professional Engineer for Equipment beyond a certain size

For mobile terminal setup at the roof, mobile operators shall ensure compliance with all related building codes. In addition, we suggest that the mobile operators shall have to ensure that their installations and operations do not have any adverse impact on the building owner's operations and building structural integrity (such building allowable height limits, floor loading, water proofing and major aesthetic considerations). Here, additional power or cooling requirements needed for the operations of the mobile operator's setup should also be chargeable with no obligations on the part of the building owner to provide if they are currently not available.