

15 May 2019

Infocomm Media Development Authority
10 Pasir Panjang Road
#03-01 Mapletree Business City

By Email & Post

Attn: Ms Aileen Chia
Deputy Chief Executive (Policy, Regulation & Competition Development)
Director-General (Telecoms & Post)

Dear Mdm,

Invitation to submit comments on the proposed 'A Converged Competition Code For The Media And Telecommunications Markets'

Thank you for giving MyRepublic Limited ("MyRepublic") this opportunity to provide feedback with regards to the consultation paper on a "A Converged Competition Code For The Media And Telecommunications Markets", dated 20 February 2019 ("Consultation Paper").

General Comments

With the technology landscape constantly evolving and new players being introduced in the telecommunication industry, we are supportive of the review on competition codes to ensure a harmonised code for Singapore telecommunication and media markets.

Specific Comments

In the following sections of this document, we will make reference to the Consultation Paper, its relevant parts and sections to provide feedback, or raise queries should there be clarification required. Where parts and sections that are not mentioned in this feedback, we have no further comment on the proposal or revision.

Reference to Part II: Market Overview and Convergence

Question	MyRepublic's Comment/Response
2.1	With regards to Section 2.16 Part II, MyRepublic of the view that, while a segment of the consumer market may remain on traditional voice services, there is already a shift of these late-adopter segments towards digital services through the reduction of smart handset prices (targeting the lower socio-economic categories), as well as better IT education and acceptance (of the higher age groups)

Reference to Part III: Regulatory Principles

Question	MyRepublic's Comment/Response
3.1	(a) MyRepublic is agreeable on the proposed merge of common regulatory principles of the TCC and MMCC. (b) MyRepublic is agreeable to retain the regulatory principle of the Promotion of Facilities-based Competition for the telecommunications industry only.

Reference to Part IV: Dominance Classification and Duties of Dominant Entities

Question	MyRepublic's Comment/Response
4.1	With reference to Section 4.6(a) Part IV, MyRepublic would like to clarify with IMDA on the definition of 'sufficiently costly or difficult to replicate', to remove any ambiguity from such classification. Some illustrations and examples will provide better understanding.

Reference to Part V: Anti-Competitive Conduct

Question	MyRepublic's Comment/Response
5.8	With reference to Section 5.39 Part V, MyRepublic would like to have increased clarity on the interpretation of "efficiency enhancing integration of economic activity" to remove any ambiguity of exclusion from the prohibition.

Reference to Part VI: Consumer Protection

Question	MyRepublic's Comment/Response
6.7	MyRepublic would like to clarify with IMDA if advisory guidelines would be issued on presentation of minimum billing information.
6.11	MyRepublic is supportive of the proposal to retain the prohibition on "slamming" for the telecommunication markets in the Converged Code.

Reference to Part X: Telecommunication Interconnection

Question	MyRepublic's Comment/Response
10.1	Although MyRepublic is supportive of IMDA's proposal to update the service interconnection framework, we disagree that the removal of Services with No Take-up basis is made on it being copper-based or other legacy services. We propose that the removal of Services with No Take-up (stated under Section 10.7 Part X) be instead based on provision of copper-based services. Local loop and unbundled network service delivered over fibre should not be part of this

	removal, as such removal could affect telecommunication licensees ability to provide services in certain buildings pre-wired by a Dominant Licensee.
10.2	MyRepublic is of the view that IMDA should continue to require Dominant Licensee to offer Regulated Services that are critical for civil infrastructure. MyRepublic further proposes that all Regulated Services be made technology neutral for future planning.
10.4	<p>With IMDA's proposal to change the interconnection charging regime for fixed voice termination to "Bill-and-Keep" ("BAK") model, the receiving party is still required to incur high costs for SS7 interconnection at the gateways and physical interconnect. High costs to licensees would remain regardless of whether it is a "Calling-Party-Pays" or BAK model. MyRepublic would like to request that IMDA looks into a more flexible and cost-effective IP based interconnection between all licensees.</p> <p>MyRepublic would like to take this opportunity to highlight that the current 1800 service or 4 digits short codes were not surfaced in this Consultation Paper. MyRepublic seek IMDA's consideration to apply the BAK model to the current 1800 service or 4 digits short codes.</p>

Reference to Part XII: Competition in a Digital Economy

Question	MyRepublic's Comment/Response
12.1	The observations on business models and market changes does resonate with MyRepublic's experiences in the digital economy. This can be seen from companies that subsidizes heavily to acquire customers, backed by venture investors who look at a longer term horizon instead of short term foundations. In addition, because the business goals of these companies are different, they compete with an unfair advantage. It is still too early to tell whether these business models are here to stay, since the proof in the pudding is the public listing of such firms and whether their share price maintains in a public market.
12.2	MyRepublic opines that sectorial regulators need to balance between ensuring fair competition whilst ensuring that innovation is not curtailed.
12.3	Given the dynamism of the digital economy, and as mentioned by this Consultation Paper, price and cost dimensions have started to differ on a per customer basis, making it hard to detect anti-competitive behaviors. This is predominantly driven by the rise of technology. As such, data taps should be considered into key industry players to better understand and analyze trends and behaviors in order to prevent anti-competitive behaviors and ensure a fair industry landscape.
12.4	MyRepublic is supportive of the proposal. For example, having strict competition assessments may prevent foreign investments into the digital economy here in Singapore, given that these companies will also need to contend with these requirements. As such, competition assessments need to balance between growing certain economic/industry agendas versus ensuring a balanced playing field.

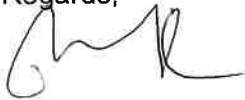
12.5	AI is still in it's infancy stage, and applying policies and interventions at this stage may have the negative effect of preventing companies from investing into research and development efforts, curtailing break though technologies.
12.6	MyRepublic's views on assessing competition dynamics in markets where data and AI are central, is the same as provided in response to Question 12. 3

Summary

MyRepublic is generally supportive of the proposals in the Consultation Paper and we look forward to IMDA's consideration of our views and proposals put forward here.

Thank you.

Regards,



Yap Yong Teck

Managing Director

MyRepublic Limited

Tel: +6596816250

Email: yongteck@myrepublic.net