



**Submission to the IMDA on
Implementation of IP-Based Interconnection in
Singapore**

**by the
Asia Pacific Carriers' Coalition**
(Incorporated in the Republic of Singapore)

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STATEMENT OF INTEREST

The Asia Pacific Carriers' Coalition (**APCC**) is an industry association of global and regional telecommunications carriers operating in the Asia Pacific region, formed to work with governments, National Regulatory Authorities and users, to advocate open market policies and best practice regulatory frameworks to promote competition and efficient investment in telecommunications markets.

The APCC does not request confidential treatment of any part of this Submission.

SUMMARY OF MAJOR POINTS

1. APCC requests IMDA to expeditiously implement IP based interconnection regime to align with new technology trends and promote competition in the VoIP market for sustainable growth.
2. International experience in other markets clearly supports the proposed migration to IP-based interconnection to align with the technology and market realities.
3. The RIO needs to be flexible, future proof & promote competition.
4. APCC encourages IMDA to continue to provide regulatory oversight and periodically review the RIO from time to time to ensure adequate competition and level playing field.
5. We hope that IMDA adopts a robust and forward-looking policy approach in its review and considers our comments in order to ensure that IP interconnection regime continues to support future competition and growth in the infocomm sector.

SPECIFIC COMMENTS TO IMDA'S CONSULTATION QUESTIONS

Question 1: IMDA invites views and comments on whether operators should follow a standardised set of technical requirements to implement IP-based interconnection at the domestic Points-of-Interconnection across all operators' networks that are interconnected to provision voice services.

Response: APCC agrees that all operators should follow a standardised set of technical requirements to implement IP based interconnection at the domestic POI across all operators' networks that are interconnected to provision voice services.

Question 2: IMDA invites views and comments on whether the Proposed SIP, based on IETF and 3GPP specifications, is appropriate and suitable to be implemented at the Points-of-Interconnection.

Response: APCC recommends IMDA to stick to the industry standard and global best practices in the implementation process.

Question 3: IMDA invites views and comments on the proposed approach to finalise the offerings of the RIO services related to IP-based interconnection, before commencing the migration to IP-based interconnection.

Response: APCC supports the proposed approach to finalise the offerings of the RIO services related to IP-based interconnection and for IMDA to provide regulatory oversight for the offerings to RIO services related to VoIP interconnect to ensure non-discriminatory, transparent access. We would also request that the proposed RIO be suitably reviewed and subject to a consultation for the best policy outcomes.

Question 4: IMDA invites views and comments on the feasibility of IMDA's proposals to revise the technical implementation of FNP service in an IP-based interconnection environment.

Response: APCC supports and agrees with IMDA's view to conduct a thorough review of the technical implementation of FNP services in an IP-based interconnection environment. The current FNP technical implementation model has been developed quite a long time ago based on TDM technology and SS7 interconnection regime and we are of the view that it is the right time to review it together with the implementation of the migration of IP-based interconnection environment and new SIP signalling environment to ensure the long term cost reduction and efficiency of FNP implementation.

Question 6: IMDA invites views and comments on IMDA's preliminary views on the broad migration approach.

Response: APCC recommends a phased migration approach to be on a safe side. A coordinated industry-wide trial migration can be supported to ensure the service providers can continue to provide uninterrupted and seamless customer experience.

CONCLUSION

In the interests of accessibility, the APCC has endeavoured to keep this Submission brief. The APCC would be pleased to provide more detailed comments or to engage further with the IMDA on the issues raised in this Submission.

Respectfully submitted by:
ASIA PACIFIC CARRIERS' COALITION