

**AUCTION OF
2.1 GHZ SPECTRUM RIGHTS (2022) FOR
5G STANDALONE (SA) NETWORK
ARCHITECTURE**

CLARIFICATIONS TO AUCTION RULES

24 SEPTEMBER 2021

INFO-COMMUNICATIONS MEDIA DEVELOPMENT AUTHORITY
REPUBLIC OF SINGAPORE

Important Notice

This clarification document shall form an integral part of, and be read in conjunction with, the Auction Rules. Where there are any inconsistencies between this clarification document and the Auction Rules, the Auction Rules shall prevail.

Clarifications

Auction Rules

S/N	Reference	Questions/ Comments	Clarifications
Auction Rules			
1.	Section 2.2.7(a)	<p>Please clarify the coverage requirement for 2.1 GHz 5G service. In paragraph 2.2.7 (a), it states “provide coverage for the whole island of Singapore, the offshore islands and the territorial waters up to 15 km from the coastline of Singapore”. However, in Appendix 4, IMDA will assess the 5G SA outdoor coverage using the 174 Hexagons approach, which does not cover offshore islands and territorial waters.</p> <p>We would like to seek clarity on the differing requirements?</p>	<p>Paragraph 2.2.7 (a) refers to the general service coverage obligation in the licence and the 2.1 GHz Spectrum Right (2022) that will be placed on an MNO that intends to use the 2.1 GHz spectrum to provide 5G services. The 174 hexagons in Appendix 4 will be used by IMDA, as a start, to assess the 5G SA outdoor service coverage commitments as stated under Section 2 of Appendix 4.</p>

S/N	Reference	Questions/ Comments	Clarifications
2.	Section 2.2.7 (c)(ii)	<p>In the case of a joint bid by the Consortium, MNOs may have their respective 2.1 GHz (FROR) Spectrum Right. Please clarify the following:</p> <p>a. If one of the MNOs has obtained IMDA’s approval to use its an FROR Lot for the provision of 5G services, and that FROR Lot is subsequently incorporated into the Joint 2.1 GHz Spectrum Right (2022), does this mean that the other MNO can also use this FROR Lot for 5G services under the Joint 2.1 GHz Spectrum Right (2022)?</p> <p>b. For the other MNO’s FROR Lot (not for the provision of 5G services), will it still be retained as a separate 2.1 GHz (FROR) Spectrum Right (2022)?</p>	<p>a. As per Section 2.2.7 (c)(ii), if an Existing MNO in the Consortium has successfully obtained IMDA’s approval to use its FROR Lot for the provision of 5G services, that FROR Lot shall be incorporated into the Joint 2.1 GHz Spectrum Right (2022) issued to the MNOs in the Consortium. That FROR Lot may be used by both MNOs in the Consortium for services covered under the Joint 2.1 GHz Spectrum Right (2022) in accordance with the terms and conditions set out therein, and provided that the FROR Lot is jointly deployed by the Consortium using the same Radio Access Network (RAN).</p> <p>b. Yes. The other MNO’s FROR Lot for the provision of 3G services will still be retained by that individual MNO under a separate 2.1 GHz (FROR) Spectrum Right (2022).</p>

S/N	Reference	Questions/ Comments	Clarifications
3.	Section 2.3.1. & 2.5.6	<p>a. Please confirm that the Applicant is only required to submit the Bank Guarantee (BG) for the Reserve Guaranteed Amount during the initial offer submission and not the BG to cover any Bids that the Prospective Bidder wishes to make.</p> <p>b. Please confirm that a Bidder will be permitted to submit Bids in the Quantity Stage of the Spectrum Auction in excess of the aggregate Guaranteed Amount of all BGs submitted to IMDA by such Bidder, provided that such Bidder has earlier submitted a Bank Guarantee to IMDA of a Guaranteed Amount sufficient to comply with section 2.3.1.</p> <p>c. Please clarify the sentence “.... pre-qualified to participate in the Spectrum Auction...” in section 2.3.1 & 2.5.6. Please confirm if this means being pre-qualified for the Initial Offer in para 2.3.1 and being pre-qualified for Quantity Stage in section 2.5.6.</p> <p>d. Please confirm that the Applicant can submit multiple BGs where the aggregated amount is at least the Reserve Guaranteed Amount if it is clarified that only the Reserve Guaranteed Amount is required during the initial offer submission.</p> <p>e. On the timeline to submit the Bank Guarantee(s), please consider permitting pre-qualified persons to submit the BGs within 5 Business Days as the sums guaranteed are no small sum and the Bank will also need more lead time to prepare the BGs.</p>	<p>a. Yes, this is correct.</p> <p>b. Yes, this is correct.</p> <p>c. Yes, “.... pre-qualified to participate in the Spectrum Auction...” in section 2.3.1 means being pre-qualified for the purposes of submitting the Initial Offer Document and Bank Guarantee(s). Section 2.5 has been amended to provide greater clarity.</p> <p>d. Yes. Bidders may submit multiple BGs (including from different banks) where the aggregated amount is at least the Reserve Guaranteed Amount, and as long as they comply fully with all the requirements in the Auction Rules in relation to the BGs (e.g. issued by a financial institution that is licensed by the Monetary Authority of Singapore to provide the full scope of services falling within the definition of banking business in the Banking Act (Cap. 19)).</p> <p>e. On further consideration, IMDA will permit pre-qualified persons to submit the BGs within five (5) Business Days of IMDA notifying that person that it has been pre-qualified to participate in the Spectrum Auction. Section 2.3.1 has been amended accordingly.</p>

S/N	Reference	Questions/ Comments	Clarifications
4.	Section 2.3.3	The Reserve Guaranteed Amount should be calculated excluding any exercised FROR Lot. The FROR Lots will be automatically awarded at the Reserve Price to existing MNOs offering 3G services, and there is no risk of the FROR Lots increasing in price. Hence, a Bank Guarantee to cover the FROR Lots would not be necessary.	IMDA maintains that the Reserve Guaranteed Amount should be calculated including any exercised FROR Lot. Note that in line with the Decision, IMDA will adopt a differentiated pricing approach; FROR lots will now be priced at a Continuity Price of S\$3 million at the point of allocation. The Auction Rules have been amended to reflect this.
5.	Section 2.4.1	In the case of a joint bid by the Consortium, please clarify whether the Authorised Representatives must be equally distributed between the Consortium members.	IMDA leaves the distribution of the Authorised Representatives between the Consortium members to the discretion of the Consortium, as long as the <u>total</u> number of the Authorised Representatives of the Consortium is in accordance with the Auction Rules.

S/N	Reference	Questions/ Comments	Clarifications
6.	Section 2.5.2 – 2.5.3	<p>a. We would also like IMDA to advise on the difference between paragraphs 2.5.2. and 2.5.3.</p> <p>b. In the previous 2016 auction, BG for provisional award was only required for deferred payment if the spectrum is not available for use (for example 700MHz). However, in this auction, full payment will have to be made within 15 days of the provisional award notice, which would make the BG redundant.</p>	<p>a. Section 2.5.2 applies at the <u>close</u> of the Quantity Stage, where Winning Bidders receive their respective Provisional Award Notice. IMDA <u>may</u>, but not necessarily, require that Bidders submit further Bank Guarantees in order for the aggregate Guaranteed Amount of all its Bank Guarantees submitted to IMDA to be at least <u>75% of the total sum of all Spectrum Lot Fees</u> in respect of all Spectrum Lot(s) which that Bidder is provisionally awarded under Section 9.12.</p> <p>Section 2.5.3 refers to the time (i.e. 5 Business Days) that Winning Bidders have to submit the Bank Guarantee referred to in Section 2.5.2, should IMDA require such Bank Guarantees referred to in Section 2.5.2.</p> <p>b. The reference to the 2016 auction is not correct. IMDA required the BGs following the close of the Quantity Stage of the 2016 auction. Please refer to the 2016 Auction Rules, Section 16.6.</p> <p>IMDA is aware of the time given under the Auction Rules for full payment to be made and will take that into consideration in exercising its discretion to determine whether it requires the BGs under Section 2.5.2.</p>

S/N	Reference	Questions/ Comments	Clarifications
7.	Section 3.7	Given the evolving Covid-19 situation, please clarify on the arrangement for the information and training sessions. Bidders may have engaged external overseas consultants and the consultants may not be able to attend the information and training session physically on site given the Covid-19 uncertainty and restrictions. Will the consultant be able to attend the sessions remotely?	IMDA is open to conducting the Information Session and the Training Session in a hybrid or pure online/virtual mode, and will provide the option to attend the sessions remotely. Given the evolving COVID-19 situation, further details will be provided closer to the date.
8.	Section 3.7	Please clarify that in the case of a joint bid by the Consortium, IMDA does not intend to impose any restrictions on the composition of representatives from the Consortium for the Information Session, so long as the number is within the prescribed limit.	IMDA leaves the composition of the representatives between the Consortium members to the discretion of the Consortium, as long as the number of the representatives of the Consortium at the Information Session is in accordance with the Auction Rules and within the prescribed limit.

S/N	Reference	Questions/ Comments	Clarifications
9.	Section 3.8	<p>Given the evolving Covid-19 situation, please clarify the auction modality, i.e., remote, on-site or hybrid (on-site with remote communication) during the quantity stage of the 2100MHz Auction.</p> <p>Bidders may have engaged external overseas consultants and the consultants may not be able to be physically on-site during the Quantity stage given the Covid-19 uncertainty and restrictions.</p> <p>Please increase the number of Authorised Representatives from 5 to 8 during the Quantity Stage of the Spectrum Auction.</p>	<p>Unless there are stricter / further restrictions on group gatherings, the Spectrum Auction is likely to take place on-site. The Auction System will only be enabled for use within a closed network on-site.</p> <p>In such a scenario, while <u>Bidders may only place their bids using the Auction System provided by IMDA</u>, Bidders will be allowed to confer with their consultants remotely, using their own devices.</p> <p>Further clarity will be provided in a separate Information Session and Training Session for the Bidders.</p> <p>If the situation permits, IMDA will consider allowing up to 8 Authorised Representatives per Bidder during the Quantity Stage of the Spectrum Auction. Bidders will be separately informed on this nearer the Quantity Stage of the Spectrum Auction.</p>

S/N	Reference	Questions/ Comments	Clarifications									
10.	Section 7.3.1(b)	<p>In the Authority’s illustration, it has provided a scenario where a Bidder reduces its bid from four Spectrum Lots to one Spectrum Lot, and additionally, has to place separate Exit Bids for “four”, “three” and “two” Spectrum Lots respectively.</p> <p>Please confirm whether the Exit Bids should be for “three”, “two” and “one” Spectrum Lots instead. Otherwise, in that given scenario, the Bidder would appear to have increased its bid to five Spectrum Lots (from the original four Spectrum Lots).</p>	<p>IMDA confirms that the Exit Bids should be for “four”, “three” and “two” Spectrum Lots respectively. To illustrate:</p> <ul style="list-style-type: none"> • Round n, a Bidder places a Valid Quantity Stage Bid, comprising a Clock Bid for four (4) Spectrum Lots at the Standing Price of $\\$X$, and no Exit Bids. • Round $n+1$, the Standing Price increases to $\\$Y$. The Bidder now intends to reduce the number of Spectrum Lots specified in its Clock Bid from four (4) Spectrum Lots to <u>one</u> (1) Spectrum Lot. In addition to a Clock Bid for one (1) Spectrum Lot, Bidder A must also place three separate Exit Bids for four (4), three (3) and two (2) Spectrum Lots respectively (<i>see table below</i>). <table border="1" data-bbox="1279 778 2101 1010"> <thead> <tr> <th data-bbox="1279 778 1525 818">Bidder A</th> <th data-bbox="1525 778 1727 818">Clock Bid</th> <th data-bbox="1727 778 2101 818">Exit Bid(s)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1279 818 1525 858">Round n ($\\$X$)</td> <td data-bbox="1525 818 1727 858">4 Lots @ $\\$X$</td> <td data-bbox="1727 818 2101 858">-</td> </tr> <tr> <td data-bbox="1279 858 1525 1010">Round $n+1$ ($\\$Y$)</td> <td data-bbox="1525 858 1727 1010">1 Lot @ $\\$Y$</td> <td data-bbox="1727 858 2101 1010"> <ul style="list-style-type: none"> • 4 Lots @ EP_4 • 3 Lots @ EP_3 • 2 Lots @ EP_2 </td> </tr> </tbody> </table> <p>Where $\\$X$, $\\$Y$ and Exit Price (EP) applies per lot $\\$X \leq EP_4 \leq EP_3 \leq EP_2 < \\Y</p> <p>Accordingly, if the Auction closes at Round $n+1$, Bidder A may be allocated:</p> <ul style="list-style-type: none"> • 1 Lot @ $\\$Y$; • 2 Lots @ EP_2; • 3 Lots @ EP_3; or • 4 Lots @ EP_4 	Bidder A	Clock Bid	Exit Bid(s)	Round n ($\$X$)	4 Lots @ $\$X$	-	Round $n+1$ ($\$Y$)	1 Lot @ $\$Y$	<ul style="list-style-type: none"> • 4 Lots @ EP_4 • 3 Lots @ EP_3 • 2 Lots @ EP_2
Bidder A	Clock Bid	Exit Bid(s)										
Round n ($\$X$)	4 Lots @ $\$X$	-										
Round $n+1$ ($\$Y$)	1 Lot @ $\$Y$	<ul style="list-style-type: none"> • 4 Lots @ EP_4 • 3 Lots @ EP_3 • 2 Lots @ EP_2 										

S/N	Reference	Questions/ Comments	Clarifications
			<p>For clarity, in this scenario, since Bidder A has placed a Clock Bid for one (1) lot @ \$Y, this means Bidder A is willing to take 1 or more lots. Therefore, this means if Bidder A is allocated either two (2) lots @ EP₂ or one (1) lot @ \$Y, it will <u>not</u> be given the option to reject either allocation.</p> <p>For further clarity, if the scenario is tweaked such that Bidder A has instead placed a Clock Bid for two (2) lots @ \$Y (and has therefore not placed a Clock Bid for one (1) lot @ \$Y), this means Bidder A is willing to take 2 or more lots. Therefore, this means:</p> <ul style="list-style-type: none"> • If Bidder A is allocated two (2) lots @ \$Y, it will <u>not</u> be given the option to reject the allocation. • Bidder A will never be allocated less than its Clock Bid of two (2) lots.

11.	Section 7.4.1	Please provide more clarity on the illustration, specifically the various scenarios under which the various spectrum lots (0 to 4) apply when the bidder fails to place a bid during Round n+1.	<p>To illustrate:</p> <ul style="list-style-type: none"> Round <i>n</i>, a Bidder places a Valid Quantity Stage Bid, comprising a Clock Bid for four (4) Spectrum Lots at the Standing Price of \$X, and no Exit Bids. Round <i>n+1</i>, the Bidder fails to place a Valid Quantity Stage Bid. <u>The Auction System will then automatically place default Exit Bids on behalf of the Bidder as shown in the following table:</u> <table border="1" data-bbox="1279 539 2098 984"> <thead> <tr> <th>Bidder A</th> <th>Clock Bid</th> <th>Exit Bid(s)</th> </tr> </thead> <tbody> <tr> <td>Round <i>n</i> (\$X)</td> <td>4 Lots @ \$X</td> <td>-</td> </tr> <tr> <td><u>Placed by Bidder</u> Round <i>n+1</i> (\$Y)</td> <td>-</td> <td>-</td> </tr> <tr> <td colspan="3">Auction System recognises that Bidder has not placed a Valid Quantity Stage Bid and automatically places the following Quantity Stage Bids on behalf of the Bidder:</td> </tr> <tr> <td><u>Placed by</u> <u>Auction System</u> Round <i>n+1</i> (\$Y)</td> <td>0 Lots @ \$Y</td> <td> <ul style="list-style-type: none"> 4 Lots @ \$X 3 Lots @ \$X 2 Lots @ \$X 1 Lot @ \$X </td> </tr> </tbody> </table> <p>Where X, Y applies per lot</p> <p>Accordingly, if the Auction closes at Round <i>n+1</i>, Bidder A may be allocated:</p> <ul style="list-style-type: none"> 1 Lot @ \$X; 2 Lots @ \$X; 3 Lots @ \$X; or 4 Lots @ \$X 	Bidder A	Clock Bid	Exit Bid(s)	Round <i>n</i> (\$X)	4 Lots @ \$X	-	<u>Placed by Bidder</u> Round <i>n+1</i> (\$Y)	-	-	Auction System recognises that Bidder has not placed a Valid Quantity Stage Bid and automatically places the following Quantity Stage Bids on behalf of the Bidder:			<u>Placed by</u> <u>Auction System</u> Round <i>n+1</i> (\$Y)	0 Lots @ \$Y	<ul style="list-style-type: none"> 4 Lots @ \$X 3 Lots @ \$X 2 Lots @ \$X 1 Lot @ \$X
Bidder A	Clock Bid	Exit Bid(s)																
Round <i>n</i> (\$X)	4 Lots @ \$X	-																
<u>Placed by Bidder</u> Round <i>n+1</i> (\$Y)	-	-																
Auction System recognises that Bidder has not placed a Valid Quantity Stage Bid and automatically places the following Quantity Stage Bids on behalf of the Bidder:																		
<u>Placed by</u> <u>Auction System</u> Round <i>n+1</i> (\$Y)	0 Lots @ \$Y	<ul style="list-style-type: none"> 4 Lots @ \$X 3 Lots @ \$X 2 Lots @ \$X 1 Lot @ \$X 																

S/N	Reference	Questions/ Comments	Clarifications
			<p>Since Bidder A has effectively placed a Clock Bid for zero (0) lots, it has therefore not placed a Clock Bid for one (1) lot or two (2) lots. Therefore, if Bidder A is allocated either 1 lot or 2 lots, it will be given the option to reject the allocation in accordance with the Auction Rules.</p>

S/N	Reference	Questions/ Comments	Clarifications
12.	Section 10.2.7	<p>a. Please clarify/elaborate on what would cause the Authority to deem an Assignment Stage proposal not being sufficiently conducive to long-term market competition. Please identify/clarify the objective criteria applied by the Authority in making such determination. Is the Authority prioritising and benefitting future rights-holders of the 2.1 GHz spectrum over the current Winning Bidders of the auction?</p> <p>b. Furthermore, if the unassigned Spectrum Lots are a consequence of Bidder(s) choosing to withdraw their Provisional Winning Bids, it would be unreasonable for the Authority to hamper the spectrum assignments for Winning Bidders and leave it open for the withdrawing parties to subsequently re-acquire the 2.1 GHz spectrum at desirable assignments.</p>	<p>a. IMDA gives the assurance that it is very unlikely to reject an Assignment Stage proposal that has been agreed to by <u>all</u> Winning Bidders given that all Winning Bidders would have taken its interests into consideration in developing that proposal. If the Assignment Stage proceeds to Phase 2 (one-time sealed bid), IMDA will provide combinations of spectrum assignment that will preserve continuity of 3G services. MNOs will be given the opportunity to provide other combinations of options, that also maintain the principle of preservation of continuity of 3G services, for IMDA's consideration and inclusion for the sealed bid. The Auction Rules has been amended to reflect this. IMDA shall have sole and absolute discretion in determining the finalised Assignment Bid Options for Assignment Stage Phase 2 in accordance.</p> <p>b. Bidders who choose to withdraw their Provisional Winning Bids will not be able to participate in the Assignment Stage of the Spectrum Auction. Following the Decision, the Auction Rules has been amended to auction the withdrawn lots through a second Quantity Stage auction. Winning Bidders of both Quantity Stages will then move on to the Assignment Stage at the same time.</p>

S/N	Reference	Questions/ Comments	Clarifications
13.	Section 13.4(b)	<p>In previous auctions, the Authority had committed to returning the Winning Bidder's BG(s) within five working days after the Payment Date.</p> <p>A similar approach should be adopted here, rather than leaving the return date to be determined at the Authority's discretion. There is real cost implication to the MNOs for providing BGs to the Authority.</p>	<p>In view of industry feedback, IMDA will include into the Auction Rules that the Winning Bidders' BGs will be returned within five Business Days from the Payment Date.</p> <p>The Auction Rules have been amended accordingly to reflect this.</p>
14.	Part IX Definitions and Interpretation	Notwithstanding the stated definition, please confirm whether the Joint 2.1 GHz Spectrum Right will be similar to the requirements for the Joint 3.5 GHz Spectrum Right issued to the Consortium.	The substantive terms of the Joint 2.1 GHz Spectrum Right will be similar to those of the 2.1 GHz Spectrum Right (2022), a template of which has been provided to the MNOs.

Appendix 1: Pre-Auction Submission

S/N	Reference	Questions/ Comments	Clarifications
Appendix 1			
1.	Paragraph 1.1	In the case of a joint bid by the Consortium, please clarify how section 1.1 of the Pre-Auction Submission form set out in Appendix 1 of the Rules should be completed for this joint bid to be regarded as a duly-completed Pre-Auction Submission under the Rules.	For a joint bid by the Consortium, the details of each Existing MNO in the Consortium must be included.
2.	Paragraph 1.4	<p>It is unclear why the winners of the 5G CFP (the “CFP Winners”) need to submit detailed business and financial information. Much of this information was not required for previous auctions, and it had already been submitted (and accepted) as part of the 5G CFP process.</p> <p>The Authority would note that the upcoming allocation of the 2.1 GHz spectrum rights is an auction process open only to known entities (i.e., the existing MNOs only). It is not a “beauty contest” where financial and business propositions need to be assessed. Requiring such submissions simply creates unnecessary administrative burden on the MNOs. If this information is genuinely necessary, it should only apply to the non-CFP Winner.</p> <p>If there was a previous joint bid by the parties, e.g., in IMDA’s 5G CFP, would it suffice for the purpose of Section 1.4 if reference is made to the previous joint bid?</p>	<p>IMDA requires the <u>updated</u> business and financial information <u>in relation to the 2.1 GHz band</u> in order to ensure that its policy objectives on 5G deployment and coverage can be met.</p> <p>CFP Winners may update their CFP submissions accordingly for this purpose. Please indicate the updates clearly in your submission.</p> <p>In a joint bid scenario, a Consortium submission must demonstrate the financial capability of the Consortium in meeting the proposed business plan(s). Where the financial / business plan(s) involve an individual member of the Consortium, and if the Consortium members agree, the individual member may submit its own financial / business information separately as supporting evidence.</p>

S/N	Reference	Questions/ Comments	Clarifications
		<p>Should the Authority require the CFP Winners to submit this information, we require clarification on the manner in which this information is to be submitted under a Consortium bid scenario. As the Authority understands, business and financial information is commercially sensitive and should not be shared between the Consortium members.</p>	
3.	Paragraph 1.5	<p>In the case of a joint bid by the Consortium, please clarify whether for the Disclosure List, there needs to be an equal number of persons from each member of the Consortium. Or will IMDA leave it to the Consortium on the number and composition of persons they wish to include in the Disclosure List?</p>	<p>IMDA leaves the number, composition and distribution of persons to include in the Disclosure List (between members of the Consortium) to the discretion of the Consortium members, as long as the Disclosure List is in accordance with the Auction Rules.</p>
4.	Paragraph 1.5	<p>The Authority refers to a “paragraph 0(g)”. Please confirm that this should refer to “paragraph 1.6(g)” instead.</p>	<p>Yes. This should refer to “paragraph 1.6(g)” instead. IMDA has made the correction.</p>
5.	Paragraph 1.6(a)	<p>The Authority refers to an “Information Memorandum” and the Important Notice set out in the introductory page contained therein. Please clarify precisely where the document may be found. When would the “Information Memorandum” be released?</p>	<p>There is no “Information Memorandum” for this Spectrum Auction. IMDA has made the correction.</p>

Appendix 2: Initial Offer

S/N	Reference	Questions/ Comments	Clarifications
Appendix 2			
1.	Paragraph 1.1	In the case of a joint bid by the Consortium, please clarify how the Initial Offer Document should be completed to reflect a joint bid. In particular, does IMDA have a preference on how the Applicant should be listed in Section 1.1 of the Initial Offer template set out in Appendix 2.	For a joint bid by the Consortium, the name of each Existing MNO in the Consortium must be included.

Key Amendments

Auction Rules

S/N	Reference	Key Amendments
1.	Section 1.1	<p>Amended to read: “These Auction Rules are issued in the exercise of IMDA’s powers conferred by the Telecommunications Act and the Telecommunications (Radio-communication) Regulations, and set out the procedures of the Spectrum Auction by which IMDA may grant to a Bidder Spectrum Rights in respect of:”.</p> <p>Insertion of new Section 1.1.1 to read “up to five (5) of the twelve (12) 2x5 MHz spectrum lots in the 2.1 GHz spectrum band (each lot to be known as a 2.1 GHz Spectrum Lot) as specified in Annex 1, unless the circumstances set out in Section 9.9 apply; or”.</p> <p>Insertion of new Section 1.1.2: “up to six (6) of the 2.1 Spectrum Lots, provided the circumstances set out in Section 9.9 apply.”.</p>
2.	Section 1.2	<p>Amended to read: “No Bidder shall bid for or be granted more than (i) five (5) 2.1 GHz Spectrum Lots in the circumstances mentioned in Section 1.1.1 above; and (ii) six (6) 2.1 GHz Spectrum Lots in the circumstances mentioned in Section 1.1.2 above.”.</p>

S/N	Reference	Key Amendments
3.	Section 2.2.7	<p>Amended Section 2.2.7(a) to read “prior to the submission of its Pre-Auction Submission, it has been notified of the specific conditions to be included in its FBO Licence, including the Schedule to be contained in the FBO Licence in relation to the provision of 5G systems and services pursuant to the grant of a 2.1 GHz Spectrum Right (2022). Such conditions include, but are not limited to, a requirement to rollout 5G SA telecommunication systems and services nationwide and provide coverage for the whole island of Singapore, the offshore islands and the territorial waters up to 15 km from the coastline of Singapore (except where limitations in service coverage are due to technical requirements imposed by IMDA, such as that to limit interference with neighbouring countries) according to the timeline specified in the respective FBO Licence, as well as resilience and cybersecurity requirements. For the avoidance of doubt, the specific conditions notified by IMDA in accordance with this Section 2.2.7(a) are non-exhaustive and IMDA may in its sole and absolute discretion include in the relevant FBO Licence such other specific conditions as IMDA deems necessary, including but not limited to requiring performance bond(s) to be furnished in respect of certain obligations as set out in the FBO Licence;”.</p> <p>Amended Section 2.2.7(c)(i) to read “if it exercises any First Right of Refusal to obtain FROR Lot(s) pursuant to these Auction Rules, that it has been notified of and accepts the specific conditions of use of the FROR Lot(s), including but not limited to that:</p> <p>(i) it shall only use the FROR Lot(s) for the provision of third-generation (hereinafter referred to as “3G”) telecommunication services and shall not use the FROR Lot(s) for the provision of any other telecommunication services, unless and until:</p> <ol style="list-style-type: none"> (1) it has fully shut down its 3G network (unless an exception has been granted by IMDA, which may be subject to such conditions as IMDA deems fit to impose in its absolute discretion, including in relation to payment of the Top Up Amount); (2) it has paid the Top Up Amount, which shall become payable immediately upon the cessation of its 3G network; and (3) it has obtained IMDA’s prior written approval for such intended use (such approval, if any, shall be at IMDA’s sole discretion and IMDA shall not be required to provide any reasons for denying approval);”.

S/N	Reference	Key Amendments
4.	Section 2.2.8	Insertion of new Section 2.2.8: “Additionally, where the Applicant, Prospective Bidder, Bidder or Winning Bidder (as the case may be) is a Consortium, the submission of a Pre-Auction Submission by the Consortium constitutes: (i) a representation by each of the Existing MNOs within the Consortium and Antina Pte Ltd (“ <i>Antina</i> ”) that each of them shall abide by, fully implement and satisfy all of the representations and commitments made in its Pre-Auction Submission if it is provisionally awarded a 2.1 GHz Spectrum Right (2022); and (ii) each of the Existing MNOs within the Consortium and Antina’s acceptance of and accession to the specific conditions of its respective FBO Licence to be granted or amended (as the case may be).”.
5.	Section 2.3.1	Amended to read “Where IMDA notifies a person that it has been pre-qualified to participate in the Spectrum Auction, such person shall, within five (5) Business Days of IMDA’s notification, submit to IMDA the following, in accordance with the requirements of these Auction Rules:...”.
6.	Section 2.3.3	Amended to read “The <i>Reserve Guaranteed Amount</i> , in relation to a person that has submitted an Initial Offer Document, shall be calculated as the total Singapore dollar value of the (i) number of FROR Lots requested in the Initial Offer multiplied by the Continuity Price plus (ii) the number of remaining 2.1 GHz Spectrum Lots requested in the Initial Offer (less any FROR Lots) multiplied by the Reserve Price.”.
7.	Section 2.4.1	Amended Section 2.4.1 (a) to read “the number of Spectrum Lots (up to five (5)) for which the Prospective Bidder is submitting an Initial Offer;”.
8.	Section 2.4.2	Amended to read “If the Prospective Bidder wishes to exercise its First Right of Refusal to acquire 2.1 GHz Spectrum Lot(s) at the Continuity Price,...”.
9.	Section 2.5.6	Amended to read “For the avoidance of doubt, it shall be the sole responsibility of all Bidders to manage their affairs and make all necessary arrangements so as to submit sufficient Bank Guarantee(s) to IMDA in good time.”.

S/N	Reference	Key Amendments
10.	Section 2.8.1	Amended to read “If the Quantity Stage of the Spectrum Auction does not proceed in accordance with Section 2.7.1, IMDA may provisionally award up to five (5) 2.1 GHz Spectrum Lots to each Bidder in accordance with their Initial Offers, including any Spectrum Lots for which the Bidder has exercised its First Right of Refusal. The Spectrum Lot Fee payable for a FROR Lot shall be the Continuity Price and the Spectrum Lot Fee payable for each 2.1 GHz Spectrum Lot (that is not a FROR Lot) provisionally awarded under this Section 2.8.1 shall be the Reserve Price. Accordingly, the total sum of all Spectrum Lot Fees payable in respect of all Spectrum Lots allocated under this Section 2.8.1 shall be the Reserve Guaranteed Amount . Such provisional awards will be made by issuing to each Bidder a Provisional Award Notice notifying that Bidder of:...”.
11.	Sections 9.7, 10.2.4, 10.3.6, 18.1	The email address has been amended to ILO@IMDA.gov.sg.
12.	Section 9.8	Amended to read “If a Bidder withdraws its Provisional Winning Bid in the specific circumstances set out in Sections 9.4 and/or 9.5 above, and in accordance with the procedure set out in Section 9.7 above, then no Forfeiture will be imposed solely for such withdrawal, and that Bidder will not be issued a Provisional Award Notice issued under Section 9.12 in respect of such Spectrum Lots. For the avoidance of doubt, the Provisional Winning Bids will become Winning Bids if IMDA has not received any notice to withdraw a Provisional Winning Bid under Section 9.7.”.

S/N	Reference	Key Amendments
13.	Section 9.9	<p>Amended to read “If IMDA receives any notice to withdraw a Provisional Winning Bid under Section 9.7, IMDA will recalculate Provisional Winning Bids for the other Bidders pursuant to Section 9.3 but will exclude all Bids placed by any Bidder(s) who have submitted a notice to withdraw a Provisional Winning Bid, using Exit Bids placed in the final Round by other Bidders. Any Spectrum Lots that cannot be assigned through this process (“Withdrawn Lots”) will be re-auctioned through a second Quantity Stage, where:”.</p> <p>Insertion of new section 9.9.1 to read “The Standing Price of each of the Withdrawn Lots for the first Round will reset to the Reserve Price;”.</p> <p>Insertion of new section 9.9.2 to read “Only Bidders who were awarded a Provisional Winning Bid and did not withdraw such Provisional Winning bid shall be allowed to put in Bids for the Withdrawn Lots, subject to a cap of six (6) 2.1 GHz Spectrum Lots for each such Bidder (including all 2.1 GHz Spectrum Lots that are provisionally awarded to that Bidder in its Provisional Winning Bid); and”.</p> <p>Insertion of new section 9.9.3 to read “Subject to the above, the rest of the rules as set out in the Auction Rules apply <i>mutatis mutandis</i> to the second Quantity Stage.”.</p>
14.	Section 9.10	<p>Amended to read “Winning Bidders will pay the Spectrum Lot Fee for each Spectrum Lot they are provisionally awarded, which will be equal to the lowest price (Standing Price or Exit Price) across all Winning (Clock and Exit) Bids of all Bidders in:</p> <ul style="list-style-type: none"> (a) the Quantity Stage referred to in Section 9.1 above, for Spectrum Lots that are provisionally awarded pursuant to such Quantity Stage; and (b) the second Quantity Stage referred to in Section 9.9 above (if applicable), for Spectrum Lots that are provisionally awarded pursuant to such second Quantity Stage.”.
15.	Section 9.11	<p>Amended to read “After the close of the Quantity Stage referred to in Section 9.1 above; and the second Quantity Stage referred to in Section 9.9 above (if applicable), IMDA will notify each Bidder of:”.</p>

S/N	Reference	Key Amendments
16.	Section 9.12	<p>Amended to read “IMDA will provisionally award the quantity of 2.1 GHz Spectrum Lots including any FROR Lots to Bidders in accordance with the results of the relevant Quantity Stage at the price established pursuant to Section 9.10 for the Spectrum Lots other than the FROR Lot, and at the Continuity Price for the FROR Lot. Each such provisional award will be made by issuing to each Bidder a Provisional Award Notice notifying the relevant Bidder of:...”.</p>
17.	Section 10.1.1	<p>Amended to read “All Winning Bidders from the Quantity Stage (including the second Quantity Stage referred to in Section 9.9 above) of the Spectrum Auction, or the Initial Offer Stage if the Quantity Stage does not proceed, are required to participate in the Assignment Stage of the Spectrum Auction. Following the completion of the Quantity Stage (or the Initial Offer Stage as the case may be), IMDA will notify all Winning Bidders of the schedule for Phase 1 of the Assignment Stage. The Assignment Stage of the Spectrum Auction will proceed in either one or two phases...”.</p>
18.	Section 10.3.2	<p>Amended to read “IMDA shall have sole and absolute discretion to identify for each Winning Bidder a list of Assignment Bid Options using an Assignment Bid Form. In identifying the Assignment Bid Options, IMDA will take into consideration factors such as the minimisation of disruption to existing services. Each Assignment Bid Option shall:</p> <ul style="list-style-type: none"> (a) prioritise the minimisation of disruption to existing 3G services; (b) preferably, but not necessarily, be a contiguous frequency assignment; (c) consist of exactly the same number of Spectrum Lots that the Winning Bidder was provisionally awarded in the Spectrum Auction (including the FROR Lots); and (d) be compatible with frequency assignments for any unassigned Spectrum Lots that IMDA deems acceptable. <p>For avoidance of doubt, the Assignment Bid Options may be provided to Winning Bidders before the Assignment Stage Phase 2.”.</p>

S/N	Reference	Key Amendments
19.	Section 10.3.3	Amended to read “Winning Bidders may (but shall not be obliged to) propose alternative Assignment Bid Options (in addition to those identified by IMDA pursuant to Section 10.3.2 above) for IMDA’s consideration. In determining whether or not to accept and include such alternatives to the updated Assignment Bid Form referred to in Section 10.3.4 below, IMDA shall take into consideration the factors mentioned in Section 10.3.2 above.”.
20.	Section 10.3.4	Amended to read “IMDA will update the Assignment Bid Form to include any accepted alternative Assignment Bid Options received pursuant to Section 10.3.3 above (in addition to the original Assignment Bid Options identified by IMDA pursuant to Section 10.3.2 above). IMDA will also inform each Winning Bidder of the date and time by which each Winning Bidder must submit its Assignment Bid Form in accordance with the Assignment Stage schedule.”.
21.	Section 13.4(b)	Amended to read “return that Winning Bidder’s Bank Guarantee(s) to that Winning Bidder within five (5) Business Days of the Payment Date.”.
22.	Section 17.2	Removal of section 17.2: “Any person considering participating in the Spectrum Auction may submit to IMDA written queries relating to these Auction Rules or the Spectrum Auction, provided that any such queries are received by IMDA on or before 31 August 2021.”.
23.	Section 17.3	Removal of section 17.3: “IMDA has no obligation to respond to any such query. If IMDA responds to any such query, IMDA will notify the person which submitted the query and any other interested persons of its response.”.
24.	Part IX	<p>Insertion of a new definition: “5G Spectrum Lot Fee means:</p> <ul style="list-style-type: none"> (a) the Reserve Price, if the Quantity Stage of the Spectrum Auction does not proceed in accordance with Section 2.7.1; or (b) the fee referred to in Section 9.10(a), if the Quantity Stage of the Spectrum Auction proceeds in accordance with Section 2.7.1.”. <p>Amended to read “Auction Rules means these rules published by IMDA relating to the procedures by which IMDA may allocate the 2.1 GHz Spectrum Lots and/or grant 2.1 GHz Spectrum Rights (2022) or 2.1 GHz (FROR) Spectrum Rights (2022) in respect of the respective 2.1 GHz Spectrum Lots as amended or varied by IMDA from time to time in accordance with these rules.”.</p>

S/N	Reference	Key Amendments
		<p>Insertion of a new definition: “Continuity Price means \$3 million, being the price of an FROR Lot.”.</p> <p>Amended to read “Effective Date means the date on which a 2.1 GHz Spectrum Right (2022) or 2.1 GHz (FROR) Spectrum Right (2022) takes effect, being such date as specified by IMDA, or such other date as IMDA may determine in accordance with these Auction Rules.”.</p> <p>Amended to read “Reserve Price means \$12 million, which is the lowest price at which a 2.1 GHz Spectrum Lot in the Spectrum Auction may be awarded.”.</p> <p>Amended to read “Spectrum Lot Fee means: (a) for each FROR Lot: the Continuity Price, per FROR Lot;...”.</p> <p>Insertion of a new definition: “Top Up Amount means the difference between the 5G Spectrum Lot Fee and the Continuity Price, pro-rated on a straight-line basis with reference to the remaining period of the Spectrum Rights in respect of the FROR Lot, and shall be calculated as follows:”.</p> $\left[(5G \text{ Spectrum Lot Fee} - \text{Continuity Price}) * \left(\frac{\text{Spectrum Rights duration (in days}_{\text{cal}}) - \text{Number of days}_{\text{cal}} \text{ FROR Lot used for 3G service provisioning}}{\text{Spectrum Rights duration (in days}_{\text{cal}})} \right) \right]$ <p>where days_{cal} = calendar days</p>

Appendix 1: Pre-Auction Submission

S/N	Reference	Key Amendments
1.	Paragraph 1.1	Insertion of footnote 1: “For a joint bid by the Consortium, the details of each Existing MNO in the Consortium must be included in Paragraph 1.1.”.
2.	Paragraph 1.5	Amended to read “...The Applicant’s Disclosure List will be considered by IMDA in determining the Applicant’s compliance with the undertakings in paragraph 1.6(g) of the Pre-Auction Submission. ...”.
3.	Paragraph 1.6(a)	Amended to read “each signatory to this Pre-Auction Submission has read, understood and shall comply with the Auction Rules, the Telecommunications (Radio-communication) Regulations, the Info-communications Media Development Authority Act and the Telecommunications Act, and has the requisite corporate authority to sign this Pre-Auction Submission on behalf of the Applicant;”.
4.	Paragraph 1.9	Amended to read: “The Applicant hereby confirms that all information submitted to IMDA as part of its Pre-Auction Submission shall constitute part of its FBO Licence application (where applicable), and that it shall be a condition of such FBO Licence as may be granted to the Applicant or amended, for it to adhere to any and all representations in the information submitted to IMDA as part of its Pre-Auction Submission.”

S/N	Reference	Key Amendments
5.	Paragraph 1.10	<p>Insertion of new paragraph: “Where the Applicant is a Consortium, the Existing MNOs in the Consortium further each confirms that it has procured the acceptance and confirmation of Antina Pte Ltd (“Antina”) that:</p> <p>(a) all information submitted to IMDA as part of the Consortium’s Pre-Auction Submission shall also constitute part of Antina’s FBO Licence application (where applicable); and</p> <p>(b) that it shall be a condition of such FBO Licence as may be granted to Antina or amended, for Antina to adhere to any and all representations in the information submitted to IMDA as part of the Consortium’s Pre-Auction Submission.</p> <p>To secure Antina’s compliance with (a) and (b) above, the Applicant (being a Consortium) shall procure, obtain and deliver to IMDA a legally binding instrument (whether by way of a Deed of Undertaking or other legally binding instrument) executed by Antina in favour of IMDA in such form and on such terms that are fully satisfactory to IMDA, providing for Antina to be subject to legally enforceable obligations in substantially the same terms as those set out in Annex A below.”.</p>
6.	Annex A	Insertion of new section, Annex A: “Legally Enforceable Obligations to be Accepted by Antina”.

Appendix 2: Initial Offer

S/N	Reference	Key Amendments
1.	Paragraph 1.1	Insertion of footnote 1: “For a joint bid by the Consortium, the details of each Existing MNO in the Consortium must be included in Paragraph 1.1.”
2.	Paragraph 1.2(a)	Amended to read “while the 2.1 GHz Spectrum Rights (2022) shall commence on 1 January 2022, the 2.1 GHz Spectrum Lots will not be available until 31 March 2022 (or such later time of a limited duration, as IMDA may determine if there are exceptional reasons) as the existing 2.1 GHz Spectrum Rights holders would require the time to switch off and cease transmission of existing services provisioned over the 2.1 GHz spectrum band;”.