
**INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY
OF SINGAPORE**

**DRAFT
ACCOUNTING SEPARATION GUIDELINES**

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GLOSSARY OF TERMS

| | | | |
|----------------|---|--------------|---|
| ADSL | Asymmetrical digital subscriber loop | O/T/T | Origination/transit/termination services |
| CCA | Current cost accounting | PI | Physical interconnection |
| DSL | Digital subscriber loop | POI | Point of interconnection |
| DSLAM | Digital subscriber loop access multiplexer | POP | Point of presence |
| ESF | Essential support facilities | PCAM | Procedure and cost allocation manual |
| FAC/FDC | Fully allocated costs / Fully distributed costs | PCS | Personal communications services |
| FBO | Facilities based operator | PSTN | Public switched telephony network |
| FLEC | Forward looking economic cost | RIO | Reference interconnection offer |
| GAAP | Generally Accepted Accounting Principles | RIM | Remote integrated multiplexer |
| GSM | Global system for mobile | SBO | Services based operator |
| ISDN | Integrated services digital network | SAS | Singapore Statements of Accounting Standard |
| HCA | Historical cost accounting | SAC | Standalone costs |
| HDSL | High bit rate digital subscriber loop | UNE | Unbundled network element |
| IASP | Internet access service provider | UNS | Unbundled network service |
| IT | Information technology | | |
| IRS | Interconnection related services | | |
| LRAIC | Long run average incremental cost | | |
| LRIC | Long run incremental cost | | |
| MDF | Main distribution frame | | |
| MSC | Mobile switching centre | | |

INTERPRETATION

In these Guidelines, unless the contrary intention appears:

- i) the following terms should be interpreted as follows:
- **COP** means the Code of Practice for Competition in the Provision of Telecommunications Services;
 - **Control** has the meaning as defined in Section 2.2(b) of these Guidelines;
 - **FBO** means a Facilities-Based Operator that has been issued with a Licence;
 - **GAAP** means the Generally Accepted Accounting Principles of Singapore;
 - **iDA** means the Info-communications Development Authority of Singapore;
 - **Licence** means a licence issued by iDA pursuant to Section 5 of the Telecommunications Act;
 - **Licensee** means a company that has been issued a Licence ;
 - **Reporting Licensee** means a Licensee that is subject to the reporting requirements set out in these Guidelines;
 - **SBO** means a Services-Based Operator that has been issued either a SBO (Individual) Licence or a SBO (Class) Licence, as the case may be;
 - **SBO (Class) Licence** means a Services-Based Operator (Class) Licence as set out in the Telecommunications (Class Licences) Regulations 2000;
 - **SBO (Individual) Licence** means a Services-Based Operator (Individual) Licence;

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- **Telecommunications Act** means the Telecommunications Act (Cap 323);
 - **SAS** means the Singapore Statements of Accounting Standards;
- ii) the terms used in these Guidelines have the same meaning as the corresponding terms in the Telecommunications Act and the regulations made thereunder; and/or the COP as the case may be; and
- iii) the singular includes the plural and vice versa.

1. INTRODUCTION

1.1 Objectives

The objective of these Guidelines is to provide a structured regulatory reporting framework which will enable iDA to:

- a) ensure that services that are provided by Dominant Licensees to their downstream operations or affiliate companies are provided on similar terms to equivalent services provided to other unrelated Licensees;
- b) monitor compliance with the cross-subsidisation provisions applying to Dominant Licensees under Section 7.2.1.3 of the COP;
- c) establish and maintain objective reference points for evaluating information provided by Licensees in relation to specific studies which may occur from time to time such as costing studies and investigation of potential predatory pricing, price squeezes, discrimination and other anti-competitive conduct;
- d) monitor the revenues and costs associated with the provision of IRS by Dominant Licensees, to ensure that such revenues and costs are clearly identified and separated from the revenues and costs of providing other services; and
- e) monitor general ICT market performance and trends.

These Guidelines also seek to:

- f) provide a structured approach for Licensees' adherence when submitting information to iDA;
- g) promote the comparability of information submitted by Licensees;
- h) ensure that Licensees report to iDA on a timely, consistent and accurate basis; and
- i) assist Licensees to better understand iDA's information requirements and regulatory functions.

1.2 Legal Authority

- a) iDA may require an FBO and a holder of an SBO (Individual) Licence to comply with the accounting separation requirement pursuant to the conditions of the FBO Licence and SBO (Individual) Licence.
- b) These Guidelines are issued pursuant to Section 28 of the Telecommunications Act.

2. APPLICATION OF THESE GUIDELINES TO LICENSEES

2.1 Overview

- a) These Guidelines provide for two levels of accounting separation. Detailed Segment Reporting requires separate reporting of key service segments and certain individual retail services. The requirements include a specified cost allocation process and prescribed allocation methodologies for certain cost and revenue items. Reports include both Income Statements and Mean Capital Employed Statements. This form of reporting applies to Dominant FBOs and their controlled entities.
- b) In contrast, Simplified Segment Reporting requires less disaggregation of operations and a less rigorous cost allocation process. Only Income Statement reporting is required. This form of reporting applies to all FBOs except Dominant FBOs and their controlled entities.
- c) The two-level approach is intended to provide iDA with the information it requires to monitor the cross-subsidisation provisions applying to Dominant FBOs under the COP, and to ensure that services provided internally by Dominant FBOs to their downstream operations or affiliates are provided on similar terms to equivalent services provided to other unrelated Licensees, while at the same time, minimising the administrative burden on those Licensees for which iDA is less likely to require such detailed information. However, iDA may require any Licensee to provide further information in relation to specific studies or investigations it may undertake from time to time.

2.2 Detailed Segment Reporting

- a) Detailed Segment Reporting applies to:
 - i) FBOs that are classified as Dominant Licensees pursuant to Section 2.2 of the COP; and
 - ii) FBOs and SBOs that are controlled by a Dominant Licensee
- b) In addition, iDA may direct an FBO or an SBO that:
 - i) controls a Dominant FBO;
 - ii) holds, is beneficially entitled to, or has a right to acquire or subscribe for more than 20 percent of a class of shares in a Dominant FBO;

- iii) has a right to acquire or subscribe for shares which, aggregated together with such shares which it holds or to which it is beneficially entitled, represent or would represent more than 20 percent of that class of shares in a Dominant FBO;
- iv) possesses voting power in respect of more than 20 percent of a class of shares of a Dominant FBO;
- v) has an indirect interest of more than 20 percent in the share capital of a Dominant FBO;
- vi) controls or is controlled by an entity falling within any of Sections 2.2(b)(i) to (v) above; and/or
- vii) is controlled by an entity who controls an entity falling within any of Sections 2.2(b)(i) to (v) above;

to undertake Detailed Segment Reporting individually and/or on a consolidated basis with that Dominant FBO.

- c) For the purposes of these Guidelines, a person **controls** another entity if, directly or indirectly, it holds or is beneficially entitled to 50 percent or more of the equity share capital in that other entity or possesses 50 percent or more of the voting power in that other entity or if it is otherwise reasonable to expect, having regard to the circumstances, that it will be able to achieve the result (by whatever means and whether directly or indirectly) that the affairs of that other entity are conducted in accordance with its wishes.

2.3 Simplified Segment Reporting

All FBOs, except Dominant FBOs and their controlled entities and those FBOs directed by iDA to report pursuant to Section 2.2(b) above, must comply with Simplified Segment Reporting requirements.

2.4 Exemptions

- a) A Licensee may apply to iDA for:
 - i) an exemption from complying with these Guidelines;
 - ii) an exemption from complying with certain provisions of these Guidelines; or
 - iii) a variation of an existing exemption.

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- b) An application for exemption must be in writing and must be accompanied by reasons for the requested exemption.
- c) iDA may grant an exemption to a Licensee, or may vary an existing exemption, if it concludes that:
 - i) the amount of revenues or costs generated by the Licensee are insignificant; or
 - ii) information about the Licensee's businesses provided in accordance with these Guidelines is likely to be of limited value to iDA in meeting the objectives set out in Section 1 of these Guidelines.
- d) The written exemption will state iDA's reasons for the exemption, which shall be based on one or both of the factors set out in Section 2.4(c)(i) and (ii) above.
- e) A Licensee that holds an exemption should notify iDA if it considers that the basis on which the exemption was granted is no longer applicable. For example, a Licensee that was exempted from the accounting separation requirements due to its small revenues, but which subsequently expands its business and has a material increase in revenues, should notify iDA of its change in circumstances. iDA will notify the Licensee of its decision whether to revoke or continue the Licensee's exemption.
- f) iDA may revoke an exemption at any time by providing written notice to the Licensee, if iDA concludes that the circumstances on which the exemption was granted have materially changed.

3. GENERAL ACCOUNTING PRINCIPLES AND PRACTICES

3.1 Overview

These Guidelines prescribe the minimum requirements necessary to achieve iDA's objectives. Licensees should ensure that the accounting and reporting practices adopted enable the provision of more detailed records and supporting information for submission to iDA in relation to special studies or investigations which iDA may undertake for the purposes of carrying out its functions and obligations under the Telecommunications Act.

3.2 General Accounting Practices and Policies

- a) Subject to exceptions which may be allowed or directed by iDA, a Licensee's accounting separation statements should conform to the accounting policies used by the Licensee in its statutory financial reports and should be consistent with the SAS.
- b) From time to time, iDA may require the Licensees to adopt particular accounting practices for the purpose of compliance with these Guidelines. Should this occur, iDA will follow the steps for Modification of Procedures for Compliance with the Guidelines as set out in Section 8.4 of these Guidelines.

3.3 Consistency and Comparability

Licensees should apply the same and consistent practices from year to year to afford meaningful comparison of information over time. However, with rapidly changing technologies, iDA recognises that changes may be necessary to ensure that the methodologies continue to be reflective of a Licensee's actual operations. Whenever changes are made to accounting practices and/or policies, Licensees must follow the procedures provided in Section 8.4 of these Guidelines.

4. COST BASIS AND COSTING STANDARD

4.1 Cost Basis

- a) Separate accounts should be prepared on a historical cost accounting (HCA) basis, in accordance with the basis for preparation of the Licensee's statutory financial statements, subject to variations allowed or directed by iDA.

4.2 Costing Standard

- a) A fully distributed cost allocation basis should be followed. This means that all costs, including corporate costs, should be fully apportioned among the reporting segments.
- b) Cost allocation methods and principles to be applied by each class of Reporting Licensee are set out in Sections 5 and 6 of these Guidelines.

5. GENERAL ALLOCATION PRINCIPLES

5.1 General Allocation Principles

For both Detailed Segment Reporting and Simplified Segment Reporting, the following general principles should be applied to revenue and cost allocation:

- a) Revenues and costs should be allocated to service or product segments on the basis of *causation*. That is, costs and revenues should be allocated to those services or products that cause the cost or revenue to arise. In practice, the following process should be followed:
 - i) review each cost and revenue item;
 - ii) identify the *driver*, i.e., the process that caused the cost to be incurred or the revenue to be earned;
 - iii) use the driver to attribute the cost or revenue to the relevant product or service, and accordingly, to the appropriate accounting separation segment.
- b) Licensees will need to use survey and sampling techniques, staff activity data and engineering information in order to allocate costs to the relevant segments.

- c) For Detailed Segment Reporting, Licensees must allocate costs and revenues according to the methodologies set out in Section 6.3 and Schedule 1 of these Guidelines. The detailed allocation methodologies used by a Licensee are subject to iDA's approval and may be subject to iDA's review from time to time.
- d) For Simplified Segment Reporting, Licensees may determine their own allocation methodologies that are consistent with the principle of causation. Allocation methodologies used by a Licensee are subject to iDA's approval and may be subject to iDA's review from time to time.
- e) The allocation bases and assumptions used should be documented in the Licensee's PCAM prepared in accordance with Section 8.1 of these Guidelines.
- f) To assist comparability, attribution methods should be consistent, i.e., the same bases and assumptions should be used from year to year. However, it is recognised that with rapidly changing technologies, it may be necessary to revise attribution methods from time to time.
- g) Allocation methodologies and resulting allocations may also be reviewed by iDA from time to time, in accordance with the processes set out in Sections 8.4 and 8.5 of these Guidelines. iDA may request a Licensee to change an allocation methodology where it considers that the allocation does not meet its information requirements.

5.2 Revenue Attribution

- a) Revenues may be attributed to services according to the following categories:
 - i) Direct revenues: Revenues which are solely generated by a particular service or product and are recorded in the accounts against the relevant product, service, asset or function.
 - ii) Directly attributable revenues: Revenues which are solely generated by a particular service or product but are not recorded in the accounts against the relevant product, service, asset or function.
 - iii) Indirectly attributable revenues: Revenues which are part of a pool of common revenues but which can be attributed to a particular service or product through a non-arbitrary and verifiable cause and effect relationship. There is no requirement for this to be a one-to-one relationship and it may be multi-step.
 - iv) Unattributable revenues: Revenues which are part of a pool of common revenues and cannot be identified to a particular service,

product, asset or function through a non-arbitrary and verifiable cause and effect relationship.

- b) Licensees are not required to separately identify the categories of revenues specified in Section 5.2(a)(i) to (iv) in their accounting separation statements.

5.3 Cost Attribution

- a) Costs may be attributed to services according to the following categories:
 - i) Direct costs: Costs which are solely generated by a particular service or product and are recorded in the accounts against the relevant product, service, asset or function.
 - ii) Directly attributable costs: Costs which are solely generated by a particular service or product but are not recorded in the accounts against the relevant product, service, asset or function.
 - iii) Indirectly attributable costs: Costs which are part of a pool of common revenues but which can be attributed to a particular service or product through a non-arbitrary and verifiable cause and effect relationship. There is no requirement for this to be a one-to-one relationship and it may be multi-step.
 - iv) Unattributable costs: Costs which are part of a pool of common costs and cannot be identified to a particular service, product, asset or function through a non-arbitrary and verifiable cause and effect relationship.
- b) Licensees are required to separately identify some or all of categories of costs specified in Section 5.3(a)(i) to (iv) in their accounting separation statements. The separate identification of costs required for Detailed Segment Reporting is specified in Section 6.4.2. The separate identification of costs required for Simplified Segment Reporting is specified in Section 7.4.2.

5.4 Types of Costs

- a) A Licensee's operations will comprise the following types of costs:
 - i) Fixed costs: Costs which do not vary with the volume of output of an activity, product or service. These costs are associated with fixed factors of production and cannot be avoided unless all contributory output is ceased.

- ii) Variable costs: Costs which vary with the volume of output of an activity, product or service. These costs are associated with variable factors of production.
- b) Licensees are required to separately identify the categories of costs specified in Section 5.4(a)(i) and (ii) in their accounting separation statements.

6. DETAILED SEGMENT REPORTING

6.1 Overview

The following sections set out the reporting structure and allocation methodologies to be followed by Licensees that are subject to Detailed Segment Reporting.

6.2 Level of Disaggregation

6.2.1 Overview

Licensees must prepare and submit separate statements for each of the following service segments that the Licensee provides:

- a) Access
- b) Domestic Network
- c) International Network
- d) Retail Services as follows:
 - i) Fixed Line Access
 - ii) Domestic Calls
 - iii) International Calls
 - iv) Domestic Leased Circuit Services
 - v) International Leased Circuit Services
 - vi) Narrowband Internet Access
 - vii) Broadband Internet Access
 - viii) Mobile Domestic Access and Calls
 - ix) Other Activities

6.2.2 Access

- a) Access is the provision of non-traffic related access services from the customer premises up to, and including, the line card or port at the local exchange (or an equivalent boundary for alternate technology solutions).
- b) Access as defined in (a) above, includes the assets and support plant associated with the components of the network listed below.
- c) Assets include the exchange MDF, call and data concentration and separation devices, the building MDF at the end user premises, roadside cabinets and standalone MDF, and inside wiring in the case of HDB flats. Examples of these assets for different technology types are as follows:
 - **Narrowband Voice and Data**
Access cable including fibre-optic, co-axial cables and copper pairs
RIM and other multiplexing equipment
Customer line card
 - **xDSL**
DSLAM
Customer side port to ATM switch or equivalent
 - **HFC Network**
Customer line card
Exchange site signal splitter
Hub or cabinet housing power supply, fibre-optic to co-axial signal conversion etc.
Amplifiers in co-axial cables
Tap in co-axial cable for customer drop wire
Drop wire between tap and customer site signal splitter
Customer site signal splitter; and
Other associated access assets.
- d) Support plant includes land, cable, ducts, man-holes, cabinets, trenches, power supplies, distribution points and other support plant associated with the components of the network listed above.
- e) Access does not include customer premises equipment.
- f) Access revenues include all inter-operator revenues received from other Licensees for unbundled local loop access and internal transfer payments from the Licensee's own or affiliated customer access business.

- g) Access costs include asset costs associated with this portion of the network as well as operational and maintenance costs associated with this plant.

6.2.3 Domestic Network

- a) Domestic Network is the provision of inter-operator domestic network conveyance services to the Licensee's own or affiliated retail businesses and/or to other operators.
- b) Assets include all domestic local and trunk switches and transmission junctions and trunks, including all equipment to provide the functionality to ensure the carriage of network services on an end-to-end call basis. The boundary of the assets included is from the trunk side of the line card on the local switch, to the input to the port on the international gateway switch (or an equivalent boundary for alternate technology solutions).
- c) Revenues include all revenues received from other operators for IRS (O/T/T) and inter-operator charges for domestic private circuits and internal transfer payments from the Licensee's own or affiliated downstream businesses.
- d) Costs include all asset costs associated with this portion of the network, operational and maintenance costs associated with this plant and inter-operator sales, billing and collection costs.

6.2.4 International Network

- a) International Network is the provision of inter-operator international network conveyance services to the Licensee's own or affiliated retail businesses and/or to other operators.
- b) Assets include all international gateway switches and switch ports and half and/or full international transmission circuits, including all equipment to provide the functionality to ensure the carriage of network services on an end-to-end call basis.
- c) Revenues include all revenues received from other operators for international in-payments, international transmission services and inter-operator international private circuits (including dark fibre) and internal transfer payments from the Licensee's own or affiliated downstream businesses.
- d) Costs include all asset costs associated with this portion of the network, operational and maintenance costs associated with this plant, international out-payments and the billing and collection costs associated with inter-operator international services.

6.2.5 Retail Services

- a) Retail services are services provided to end-users. The key sub-segments are major service categories which have been selected based on relative competitive intensities, bottleneck characteristics and market importance.
- b) The disaggregated activities within the retail business which should be separately reported are as follows:
 - i) **Fixed Line Access**, which is the provision of customer access to the telecommunication network. This activity includes all non-traffic related charges associated with providing customers with access to the network such as connection charges, line rental, moves and changes, repairs and maintenance charges. Costs include relevant inter-operator network charges paid to other Licensees, transfer payments to the Licensee's internal or affiliated upstream businesses marketing, sales, billing and collection costs.
 - ii) **Domestic Calls**, which include all domestic dialled calls originating from PSTN, ISDN and private payphone telephone exchange lines within Singapore and terminating within Singapore, including fixed to mobile calls. Revenues include all call charges associated with providing customers fixed network calls between two points in Singapore. Costs include relevant inter-operator network charges paid to other operators, transfer payments to the Licensee's own or affiliated upstream businesses, marketing, sales, billing and collection costs.
 - iii) **International Calls** which include calls to or from overseas destinations originating from PSTN, ISDN, wireless, cellular mobile, PCS, trunk radio, and private telephone exchange lines within or outside Singapore. Revenues include all international call charges. Costs include relevant inter-operator network charges paid to other operators, transfer payments to the Licensee's own or affiliated upstream businesses, termination payments paid to overseas telecommunications operators, marketing, sales, billing and collection costs.
 - iv) **Domestic Leased Circuit Services**, which include rental, maintenance, connection, shift and change of dedicated leased circuits provided between two or more points within Singapore. Revenues include charges for domestic retail private leased circuits including basic transmission links (e.g., E1, DS3 etc.), ATM, Frame Relay and other private or virtual private circuit services. Costs include relevant inter-operator network charges paid to other operators, transfer payments to the Licensee's own or affiliated upstream businesses, marketing, sales, billing and collection costs.

- v) **International Leased Circuit Services**, which include rental, maintenance, connection, shift and change of dedicated leased circuits provided between a point within Singapore and an overseas destination. Revenues include charges for retail international private leased circuits including basic transmission links (such as E1, multiples of E1, DS3, etc.), ATM, Frame Relay and other private or virtual private circuit services. Costs include relevant inter-operator network charges paid to other operators, transfer payments to the Licensee's own or affiliated upstream businesses, marketing, sales, billing and collection costs.

- vi) **Narrowband Internet Access**, which is the provision of Public Internet Access Services provided via PSTN or ISDN dialup access, or by semi-permanent and private leased circuits. Semi-permanent and private leased circuit Internet access is classed as Narrowband Internet Access for the purposes of accounting separation. Revenues include connection fees and monthly or annual IASP access charges. Costs include inter-operator charges paid to other operators, asset related expenses (such as depreciation and maintenance costs), customer service, help desk, marketing, sales, billing and collection costs incurred in the provision of Narrowband Internet Access.

- vii) **Broadband Internet Access** which is the provision of basic Public Internet Access Services via broadband wireline or wireless access media, including xDSL, HFC cable broadband wireless and semi-permanent and private leased circuits. Revenues include connection fees and monthly or annual IASP access charges. Costs include asset related expenses (such as depreciation and maintenance costs), inter-operator charges paid to other operators, customer service, help desk, marketing, sales, billing and collection costs incurred in the provision of Broadband Internet Access.

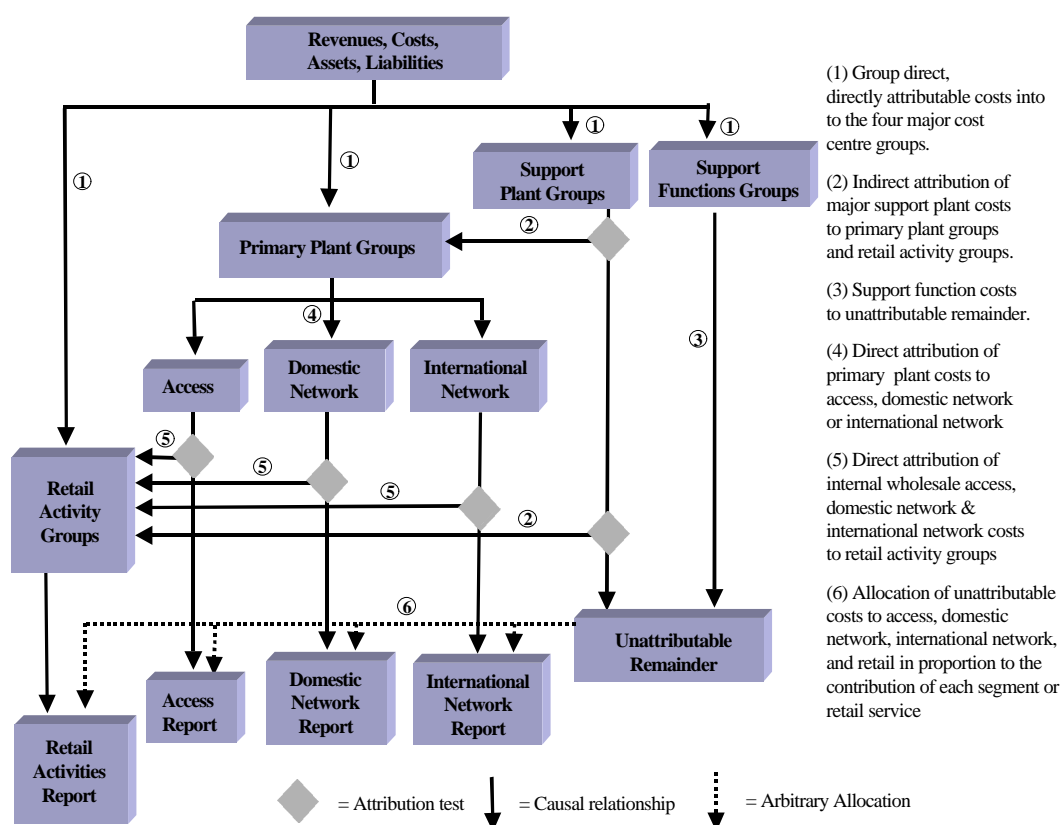
- viii) **Mobile Domestic Access and Calls** which is the provision of access and call services via cellular mobile, personal communication services and trunk radio telecommunications networks. Revenues include monthly or annual access and service charges and call charges associated with the provision of calls and services via mobile telecommunications networks, including domestic mobile to fixed calls and domestic mobile to mobile calls. Costs include asset costs associated with the Licensee's mobile telecommunications networks, inter-operator network charges paid to other Licensees, marketing, sales, billing and collection costs.

- ix) **Other Activities**, which includes all telecommunications businesses and activities of the Licensee which are not captured by any of the other segments defined above. For example, this would include the provision of customer premises equipment.

6.3 Cost and Revenue Allocation Methodology

6.3.1 Allocation Methodology

- a) Allocation of costs and revenues should be consistent with the allocation principles set out in Section 5 of these Guidelines.
- b) The process illustrated in the following diagram should be used to fully allocate the Licensee's costs and revenues. The methodology is intended to provide a structured guide for Licensees.



- c) The allocation approach is a tiered attribution process beginning with the identification of direct and directly attributable costs and progressively attributing indirect costs on the basis of cost driver relationships. The steps involved are:
 - i) Direct and directly attributable costs are allocated to the four *cost centre pools* listed below. The attribution of direct and directly attributable retail services costs is a final allocation. Costs attributed to the other three cost centre pools (primary plant, support plant and support functions) must be progressively apportioned through the

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tiered process set out in steps 6.3.1(c)(ii) through (v) to achieve a final allocation to segments.

| Cost Centre Pool | Description |
|-------------------------|---|
| Retail Services | The income, costs and capital employed associated with retail services or products, such as domestic calls and international calls. |
| Primary Plant | The costs and capital employed relating to core network infrastructure, such as switches, lines, and multiplexers. Examples are provisioning, depreciation, maintenance and systems support expenses relating to specific primary plant groups. |
| Support Plant | Other non-network infrastructure and capital, such as power plant, network administration computers and plant testing equipment. Examples are depreciation and maintenance expenses relating to specific support plant groups. |
| Support Functions | All other revenues and costs which cannot be directly attributed to plant or retail service activities, such as such as human resource management, financial control, administration, and other corporate overheads. |

- ii) Support plant costs are indirectly attributed to primary plant or retail services using the most relevant and reasonable cost driver available. For example, some power plant costs may be attributed to core network components. During this step, costs that are difficult to attribute¹ or are unattributable are passed through to the unattributable remainder account.
- iii) Primary plant costs are split into those associated with the customer access network (“Access”), those associated with the shared domestic network (“Domestic Network”) and those associated with the international network (“International Network”).
- iv) Where a specific cost driver relationship exists, the Access, Domestic Network and International Network costs are directly

¹ Indirectly attributable costs, which are not required to be attributed to individual segments, must be specified in the Licensee’s approved PCAM. In considering whether indirectly attributable costs are difficult to allocate, iDA will consider the relative complexity of the cost driver relationship in question and the relative importance of the cost/revenue item.

attributed to Retail Services based on the most relevant and reasonable cost drivers. In most instances, this would be a usage based attribution (e.g., minutes of use or number of calls).

- v) The remaining unattributable costs will comprise joint and common costs which cannot be directly or indirectly attributed to any particular service or product. These costs are allocated to Access, Domestic Network, International Network and Retail Services on a proportional basis to the contribution of each segment identified prior to the allocation of these joint and common costs. That is, the “contribution” is calculated as the revenue for the segment less the directly and indirectly attributable costs that have been attributed to the segment.
- d) Detailed allocation methodologies for certain cost and revenue items are prescribed in Schedule 1 of these Guidelines. Detailed allocation methodologies developed by the Licensee should be consistent with the methodologies in Schedule 1, except where iDA has approved an alternative allocation methodology.
- e) Detailed allocation methodologies for other cost and revenue items that are not prescribed in Schedule 1 may be determined by the Licensee and may vary depending on the individual Licensee’s organisational structure and internal financial reporting systems. The allocation bases and assumptions should be reasonable and justifiable, and must be documented in the Licensee’s PCAM prepared in accordance with Section 8.1 of these Guidelines and approved by iDA.

6.3.2 Allocation of Revenues

- a) It is expected that revenue from provision of most inter-operator and retail services will be recorded in the Licensee’s accounts in such a manner that it can be directly allocated to products/services. In cases where direct allocation is not possible, revenue should be attributed on the basis of causation in accordance with the allocation methods set out in Schedule 1 and as documented in the Licensee’s PCAM.
- b) Allocation methods for key revenue items are provided in Schedule 1. Detailed allocation methods developed by Licensees should be consistent with the allocation methods set out in Schedule 1.

6.3.3 Allocation of Operating Costs

- a) Operating costs are drawn from accounting records.

- b) Allocation methods for key operating cost items are provided in Schedule 1. Detailed allocation methods developed by Licensees should be consistent with the allocation methods set out in Schedule 1.

6.3.4 Allocation of Capital Employed

- a) The process for allocating capital employed should be similar to that for operating costs. General principles for the allocation of the main types of capital employed are as follows.
- i) Fixed assets can be divided into those assets that can be directly allocated to plant or retail activity group, assets that can be allocated to plant groups based on an identifiable cost driver relationship and support assets that cannot be attributed to any particular segment, such as corporate computers. As far as possible, assets should be reported in the Statement of Mean Capital Employed against the network segments that they represent or support. For example, switching equipment associated with the domestic transmission network should be recorded against the Domestic Network segment.
 - ii) Current assets and liabilities should be directly attributed to activities wherever possible. For example, specific debtors, creditors, stocks and provisions should be directly allocated to the services to which they relate. Some of these assets, such as trade debtors and short-term investments will be more appropriately allocated on the basis of revenues than on the basis of costs.
 - iii) Cash balances may relate to an operational requirement or may be surplus. An assessment of each cash account should be made in order to identify cash that is related to operations and surplus cash. Where cash can be related to operations, the balance should be allocated to particular segments. For example, cash from recently paid debtors should be allocated on the same basis as trade debtors, and cash set aside to pay creditors should be allocated on the same basis as the corresponding creditors. Surplus cash balances are essentially a funding decision equivalent to negative debt and should not be allocated to particular segments. Surplus cash would typically be separated from operational cash. Interest earned on surplus cash balances should also be excluded from the segment Income Statements.
 - iv) The statement of Mean Capital Employed should not include liabilities that relate to the business as a whole. For example, items that should be excluded include long term borrowings, dividends and tax related items. Long-term borrowings should normally be excluded because they are essentially an alternative to equity funding. That is, a business will fund its assets through a mixture of

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long term debt and equity. The Statement of Mean Capital Employed should reflect the value of net assets that are funded but should not include the funding itself.

- b) Tangible assets associated with the Licensee’s network should be allocated directly to plant groups or retail services where possible. Other assets, which provide support functions, may be indirectly allocated to network plant groups. Where a reasonable cost driver relationship is vague or difficult to determine with a reasonable degree of precision, assets may be allocated on a reasonable basis.
- c) Allocation methods for key capital items are provided in Schedule 1. Detailed cost allocation methods developed by Licensees should be consistent with the allocation methods set out in Schedule 1.
- d) Prior to allocation, the capital employed is the basis of deriving the depreciation values to be used in the Income Statement reporting. The asset lives used for each major asset group should be clearly identified in the Licensee’s PCAM. The allocation basis used for allocating depreciation costs to each segment in the Licensee’s Income Statements should be the same basis as is used for allocation of the corresponding assets in the Licensee’s Mean Capital Employed Statements.

6.4 Reporting Requirements

6.4.1 Reporting Cycle

- a) Licensees must prepare and submit the following statements:

| Statement | Period and Frequency | Timing |
|--|---|--|
| Income Statements | 6 monthly (for the first six months and second six months of the Licensee’s financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Reconciliation of Consolidated Income Statement | Annual (for the Licensee’s full financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Statements of Mean Capital Employed | 6 monthly (for the first six months and second six months of the Licensee’s financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Reconciliation of Consolidated Mean Capital Employed Statement | Annual (for the Licensee’s full financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |

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| Statement | Period and Frequency | Timing |
|----------------------|---|--|
| Non-financial Report | 6 monthly (for the first six months and second six months of the Licensee's financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Annual Audit Report | Annual (for the Licensee's full financial year) | To be submitted to iDA within 2 weeks of the audit completion date |

6.4.2 Detailed Segment Income Statements

- a) A separate Detailed Income Statement must be prepared for each segment listed in Section 6.2.1 of these Guidelines.
- b) Each Detailed Segment Income Statement must report:
 - i) the revenues for each segment, with separate identification of:
 - revenues from external sources;
 - revenues from the Licensee's internal businesses; and
 - revenues from controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these guidelines.
 - ii) the costs for each segment, with separate identification of:
 - variable costs;
 - fixed costs;
 - direct and directly attributable costs;
 - indirectly attributable costs;
 - allocated unattributable costs;
 - charges paid to the Licensee's internal businesses;
 - charges paid to the Licensee's controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these guidelines; and
 - charges paid to other operators.
 - iii) the calculated return for each segment.

- c) A suggested format for Detailed Segment Income Statements is illustrated in Schedule 2 – S2.1.

6.4.3 Reconciliation of Consolidated Income Statement

- a) A Reconciliation of Consolidated Income Statement must be prepared for all detailed segments provided by the Dominant Licensee and its controlled entities. This statement should report:
 - i) a summary of revenues, operating costs and return for every segment;
 - ii) consolidated adjustments, with separate identification of each adjustment item; and
 - iii) reconciliation to the Licensee’s audited consolidated Income Statement.
- b) A suggested Reconciliation of Consolidated Income Statement format is illustrated in Schedule 2 – S2.2.

6.4.4 Simplified Segment Income Statements

- a) FBO’s required to report under Detailed Segment Reporting are also required to prepare separate Simplified Segment Income Statements for each segment listed in Section 7.2.1 of these Guidelines. These statements must be prepared in accordance with Section 7.4.2 of these Guidelines.
- b) These statements are required to enable iDA to monitor developments and trends in the markets for major infocommunications services in Singapore.

6.4.5 Statement of Mean Capital Employed

- a) A Statement of Mean Capital Employed must be prepared for each segment listed in Section 6.2.1 of these Guidelines.
- b) Mean capital employed is defined as total assets less current liabilities, excluding corporate taxes, dividends payable and long term liabilities. That is, it is the total written down value of non-current assets and working capital. The mean is computed as the average of the start and end values for the relevant period. The following items should be separately identified:
 - i) Current assets by major line item
 - ii) Non-current assets by major line item
 - iii) Current liabilities by major line item

- iv) Non-current liabilities by major line item
 - v) Total mean capital employed
 - vi) Return on capital employed
- c) A suggested format for the Statements of Mean Capital Employed is illustrated in Schedule 2 – S2.3.

6.4.6 Reconciliation of Consolidated Mean Capital Employed Statement

- a) A Reconciliation of Consolidated Mean Capital Employed Statement should be prepared for all segments provided by the Licensee and its controlled entities. This statement should report:
- i) a summary of mean capital employed for every segment;
 - ii) adjustments, with separate identification of each adjustment item;
 - iii) reconciliation of net assets with the Licensee’s audited consolidated Balance Sheet.
- b) A suggested format for the Reconciliation of Consolidated Mean Capital Employed Statement is illustrated in Schedule 2 – S2.4.

6.4.7 Non-financial Information Report

- a) Licensees must submit a Non-financial Information Report covering the installed capacity and service usage parameters as set out in Schedule 2 – S2.5.
- b) Licensees have discretion in the format for non-financial information reporting.

7. SIMPLIFIED SEGMENT REPORTING

7.1 Overview

The following sections set out the reporting structure and allocation methodologies to be followed by Licensees that are subject to Simplified Segment Reporting.

7.2 Level of Disaggregation

7.2.1 Overview

The Licensee must prepare and submit separate statements for each of the following service segments that the Licensee provides:

- a) Fixed Domestic Services
- b) International Fixed and Mobile Services
- c) Mobile Domestic Services
- d) Narrowband Internet Access
- e) Broadband Internet Access
- f) Other Activities

7.2.2 Fixed Domestic Services

Fixed domestic services include wireline and fixed-wireless customer access services, fixed domestic voice and data call services, domestic leased circuits, fixed to mobile call services, broadband access and transmission services that are provided to other operators or to end users. Revenues include retail charges to end user customers and inter-operator charges to other operators for these services. Costs include asset related expenses (such as depreciation and maintenance costs) associated with assets used in the provision of fixed network services, charges paid to other operators for interconnection and inter-operator services, marketing, sales, billing and collection costs.

7.2.3 International Fixed and Mobile Services

International fixed and mobile services include international voice and data call services, international leased circuits and international transmission services that are provided to other operators or to end users, where customer access occurs over wireline and fixed-wireless and mobile customer access services. Revenues include retail charges to end user customers and inter-operator charges to other operators for these services. Costs include asset related expenses (such as depreciation and maintenance costs) associated with assets used in the provision of international

services, charges paid to other operators for interconnection and inter-operator services, termination payments paid to overseas telecommunications operators, marketing, sales, billing and collection costs.

7.2.4 Mobile Domestic Services

Mobile domestic services include the provision of access and call services via cellular mobile, PCS and trunk radio telecommunications networks. Revenues include monthly or annual access and service charges and call charges associated with the provision of calls and services via mobile telecommunications networks, including domestic mobile to fixed calls, and domestic mobile to mobile calls. Costs include asset related expenses (such as depreciation and maintenance costs) associated with assets used in the provision of mobile services, inter-operator network charges paid to other operators, marketing, sales, billing and collection costs.

7.2.5 Narrowband Internet Access

Narrowband Internet Access is the provision of Public Internet Access Services provided via PSTN or ISDN dialup access, or by semi-permanent and private leased circuits. Semi-permanent and private leased circuit Internet access is classed as Narrowband Internet Access for the purposes of accounting separation. Revenues include connection fees and monthly or annual IASP access charges. Costs include inter-operator charges paid to other operators, asset related expenses (such as depreciation and maintenance costs), customer service, help desk, marketing, sales, billing and collection costs incurred in the provision of Narrowband Internet Access.

7.2.6 Broadband Internet Access

Broadband Internet Access is the provision of basic Public Internet Access Services via broadband wireline or wireless access media, including xDSL, HFC cable broadband wireless and semi-permanent and private leased circuits. Revenues include connection fees and monthly or annual IASP access charges. Costs include asset related expenses (such as depreciation and maintenance costs), inter-operator charges paid to other operators, customer service, help desk, marketing, sales, billing and collection costs incurred in the provision of Broadband Internet Access.

7.2.7 Other Activities

Other activities include all telecommunications businesses and activities of the Licensee which are not captured by any of the other segments defined above. For example, this would include the provision of customer premises equipment.

7.3 Cost and Revenue Allocation Methodology

7.3.1 Allocation Principles

- a) Allocation of costs and revenues should be consistent with the allocation principles set out in Section 5 of these Guidelines.
- b) The allocation methodologies used by a Licensee may vary depending on the Licensee's organisational structure and internal financial reporting systems. However, the allocation bases and assumptions should be reasonable and consistently applied. That is, as far as possible, the same bases and assumptions should be used from year to year.
- c) Allocation methodologies and resulting allocations are subject to iDA's approval and may be reviewed by iDA from time to time. iDA may request a Licensee to change an allocation methodology where it considers that the allocation does not meet its information requirements.

7.4 Reporting Requirements

7.4.1 Reporting Cycle

- a) Licensees must prepare and submit the following statements:

| Statement | Period and Frequency | Timing |
|---|---|--|
| Income Statements | 6 monthly (for the first six months and second six months of the Licensee's financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Reconciliation of Consolidated Income Statement | Annual (for the Licensee's full financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Non-financial Report | 6 monthly (for the first six months and second six months of the Licensee's financial year) | To be submitted to iDA 4 months after the end of the relevant reporting period |
| Annual Audit Report | Annual (for the Licensee's full financial year) | To be submitted to iDA within 2 weeks of the audit completion date |

7.4.2 Simplified Segment Income Statements

- a) A separate Simplified Segment Income Statement must be prepared for each service segment listed in Section 7.2.1 of these Guidelines.
- b) Each Simplified Segment Income Statement must report:
 - i) the revenues for each service segment;
 - ii) the costs for each segment, with separate identification of:
 - fixed and variable costs;
 - direct, directly attributable and indirectly attributable costs; and
 - allocated unattributable costs.
- c) A suggested format for Simplified Segment Income Statements is illustrated in Schedule 3 – S3.1.

7.4.3 Reconciliation of Consolidated Income Statement

- a) Where a Licensee, as a single entity, provides services in more than one segment, it must prepare and submit a Reconciliation of Consolidated Income Statement consolidating the segments provided by the entity. This statement should report:
 - i) a summary of revenues, operating costs and return for each segment;
 - ii) consolidated adjustments, with separate identification of each adjustment item; and
 - iii) reconciliation with the Licensee's audited Income Statement.
- b) A suggested Reconciliation of Consolidated Income Statement format is illustrated in Schedule 3 – S3.2.

7.4.4 Non-financial Information Report

- a) Licensees must submit a Non-financial Information Report covering the installed capacity and service usage parameters as set out in Schedule 3 – S3.3.
- b) Licensees have discretion in the format for non-financial information reporting.

8. ADMINISTRATIVE REQUIREMENTS

8.1 Procedure and Cost Allocation Manual to be Prepared and Maintained by Reporting Licensees

- a) Each Licensee should document the procedures it has taken to implement these Guidelines in a Procedure and Cost Allocation Manual (PCAM), which will be subject to approval by iDA.
- b) A copy of the PCAM should be provided to iDA in hard copy form.
- c) Subject to such extensions that may be granted by iDA, within 90 days of the effective date of these Guidelines, a Licensee must submit a proposed PCAM to iDA for approval.
- d) The proposed PCAM must contain a comprehensive and complete written statement of the policies, principles and methodologies that the Licensee will follow in preparing its accounting separation reports required pursuant to these Guidelines. It must be sufficiently detailed to enable an external party or an external auditor to understand the methodologies that have been used in preparing the accounting separation reports. It should include audit control procedures and trails used in data preparation to assist in an audit review. In particular, the proposed PCAM should include the following information:

| | |
|------------------------------------|--|
| Organisational Structure | Background information on the structure of the Licensee's organisation and its broad lines of business. This should include details of the business units within the organisation and the relationships between support units and the main business streams. |
| Group Structure | List of the entities covered by the reporting and the relationships between the entities, where the information relates to more than one entity. |
| Accounting Systems | Details of the financial, accounting and operational systems used by the reporting organisation for the capture and generation of the accounting separation information. |
| Accounting Policies | Details of the accounting policies used by the Licensee in preparing the accounting separation reports. |
| PCAM Maintenance Procedures | Details of the procedures for maintenance and updating of the PCAM and associated internal controls. |
| Reporting Requirements | Description of each of the reports required, with formats included in an appendix. |
| Segment | Definitions of each of the product/segments and details of how the |

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| | |
|---|---|
| Definitions | Licensee's services map to these products/segments. |
| Allocation principles | As set out in the ASG but with the additional detail of those allocation principles that are not specified in the ASG. |
| Allocation Procedures | Details of any studies, surveys or models that are used for allocation purposes. In this regard, the PCAM should provide worked examples of all of the allocation methods that are used. |
| Detailed GL Mapping and Allocation | For each General Ledger line used by the carrier, the following information should be provided: <ul style="list-style-type: none"> ▪ GL account number and description; ▪ Allocation principle (i.e., direct, attributable or unattributable); ▪ Allocation method (i.e., for all indirectly attributable and unattributable costs and revenues, this would be a description of the model or survey used as the allocation basis) and the detail of the allocation technique, assumptions made and cross reference to the file/data for audit purposes; ▪ Allocation driver (for example floorspace, number of staff, minutes of usage, number of calls, etc.). |
| Operational Data | Description of required reports, sources of information and allocation or modelling procedures used to prepare the reports. |
| Glossary | Definition of terms used in the PCAM. |

- e) iDA will review the Licensee's PCAM and provide written notification to the Licensee of its approval, non-approval, request for further information or modifications within 90 days of the Licensee's submission of the PCAM. Subject to such extensions that may be granted by iDA, the Licensee must submit the required information or modified PCAM within 30 days of iDA's notification. The 90 day review period may then be extended accordingly. The approval notification will specify the date on which the Licensee must begin reporting in compliance with these Guidelines.

8.2 Audit and Compliance

- a) A Licensee shall appoint an independent auditor to audit the Accounting Separation Statements to be submitted to iDA under these Guidelines.
- b) The auditor must be a member of the Institute of Certified Public Accountants of Singapore (ICPAS).
- c) The auditor is appointed by the Licensee and the responsibility for completion of the audit lies with the Licensee. However, iDA may request meetings with the auditor to discuss the auditor's work, and the Licensee shall ensure that this is provided for in the Letter of Engagement or contract with its auditor.

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- d) iDA may also appoint an auditor or request that the Licensee's auditor undertake a re-audit, in whole or in part, if iDA considers the the initial audit requires further work to ensure regulatory certainty, or if the Auditor's Report does not, in iDA's view, give sufficient clearance of the Accounting Separation Statements for regulatory purposes. Such re-audit may follow the issuance of an Auditor's Report with certain caveats, such as comments on material non-compliance with the Licensee's Procedures and Cost Allocation Manual, or any other deficiency or failure, or such other matters arising from the audit as the auditor considers should be reported, in respect of matters relating to the Accounting Separation Statements.
- e) The Licensee shall grant the auditor or any person authorised by him the right of access at any reasonable time to the accounting and other records of the Licensee, and to require from any officer of the Licensee such information and explanation as he desires for the purposes of the audit.
- f) All audit costs, including costs of a re-audit, whether the auditor is appointed by the Licensee or by iDA, are to be borne by the Licensee.
- g) The auditor shall conduct his audit in accordance with the Singapore Standards on Auditing.
- h) The auditor shall, in his Auditor's Report, express an opinion on the following:
- i) In the case of a Licensee which is subject to Detailed Segment Reporting, whether the Accounting Separation Statements for the year ended have been properly drawn up in accordance with the Licensee's PCAM that has been approved by iDA under the Accounting Separation Guidelines and so as to present fairly, in all material respects the information reported in:
- the Income Statement of each reporting segment;
 - the Reconciliation of Consolidated Income Statement with the Licensee's audited statutory Income Statement or Consolidated Income Statement (as the case may be);
 - the Statement of Mean Capital Employed for each reporting segment;
 - the Reconciliation of Consolidated Mean Capital Employed Statement with the Licensee's audited Balance Sheet or Consolidated Balance Sheet (as the case may be); and
 - the Non-financial Information Report.

- ii) In the case of a Licensee which is subject to Simplified Segment Reporting, whether the Accounting Separation Statements for the year ended have been properly drawn up in accordance with the Licensee's PCAM that has been approved by iDA under the Accounting Separation Guidelines and so as to present fairly, in all material respects the information contained in:
 - the Income Statement of each reporting segment;
 - the Reconciliation of Consolidated Income Statement with the Licensee's audited statutory Income Statement or Consolidated Income Statement (as the case may be); and
 - the Non-financial Information Report.
- iii) Whether all changes to the Licensee's PCAM that materially affect the Accounting Separation Statements for the year ended have been filed with, and approved by, iDA.
- i) The auditor shall also state in his Auditor's Report, or make a reference in his Auditor's Report to any special report as may appear to him to be necessary, on the following:
 - i) Any material non-compliance with the Licensee's PCAM pertaining to those Accounting Separation Statements, and the impact thereof; and
 - ii) Any other deficiency or failure, or such other matters arising from the audit as he considers should be reported, in respect of matters relating to the Accounting Separation Statements. These include, but not limited to, failure to obtain from the Licensee all information and explanation that he requires and the audited statutory financial statements being subject to a qualification by the auditor.
- j) The Auditor's Report and any special report to the Licensee shall be attached to the Accounting Separation Statements for the purposes of submission to iDA. Such a special report includes what the auditing profession commonly refers to as the "Management Letter".

8.3 Confidentiality

As information provided to iDA in compliance with these Guidelines may be of a commercially sensitive nature, iDA will:

- i) in general, limit the disclosure of such information to its staff, legal advisers and consultants;
- ii) use the information only for its regulatory statements and duties; and
- iii) disclose the information to others only if iDA considers such a disclosure necessary to carry out its functions under the Telecommunications Act.

8.4 Modification of Procedures for Compliance with these Guidelines

- a) Any changes to the procedures for compliance with these Guidelines proposed by a Licensee must be filed with iDA and are subject to iDA's approval prior to implementation.
- b) Proposed changes should be accompanied by a statement of reasons for the change and the financial impact of the proposed change should be illustrated. For the purposes of illustrating the effect of the proposed change, the Licensee should submit reporting statements for the previous two periods.
- c) iDA may request the Licensee to provide further information for the purposes of its consideration of the proposed change.
- d) iDA will consider the proposed changes and notify the Licensee of its approval as soon as practicable.
- e) iDA may require a Licensee to amend its procedures for compliance with these Guidelines from time to time.
- f) A requirement for amendment to procedures will be notified in writing to the Licensee.
- g) iDA may require an amendment to procedures to be effected within a certain time period.

8.5 Modification of these Guidelines

- a) These Guidelines may be updated and revised from time to time to cater for changes in practices, the introduction of new products and technologies and the need to refine practices and principles.

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- b) In general, a change to these Guidelines will be effective 6 months after the change is notified by iDA, unless iDA considers it necessary to require a change to be implemented at an earlier or later date. In determining the timeframe for implementation of changes to these Guidelines, iDA will consider the nature of the change and the likely impact of the change on Licensee's reporting procedures.

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|------------------------------|---|---|---|
| Revenue | | | |
| Customer connection revenue | All revenue earned from connecting customers including installation charges. | Direct to product where possible. Otherwise allocate on the basis of estimated usage as defined in the Licensee's PCAM. Revenue from bundled products should be disaggregated and attributed to individual services based on average usage profiles. Revenue earned in advance is to be accrued and applied over the term of the agreement. | Retail Services (Customer Access) |
| Customer line rental revenue | All revenue earned from line rentals, special plan fees and discount schemes | Direct to product where possible. Otherwise allocate on the basis of estimated usage as defined in the Licensee's PCAM. Revenue from bundled products should be disaggregated and attributed to individual services based on average usage profiles. Revenue earned in advance is to be accrued and applied over the term of the agreement. | Retail Services (Customer Access) |
| Retail call revenue | All revenue received from end-users relating to the provision of call services. | Direct to product where possible. Otherwise allocate on the basis of estimated usage as defined in the Licensee's PCAM. Revenue from bundled products should be disaggregated and attributed to individual services based on average usage profiles. Revenue earned in advance is to be accrued and applied over the term of the agreement. | Retail Services (should be allocated to the appropriate individual call products) |
| Leased circuit revenue | All revenue earned from the provision of leased circuit services to final end consumers | Direct to product where possible. Otherwise allocated on the basis of circuit usage as defined in the Licensee's PCAM. Revenue earned in advance is to be accrued and applied over the term of the agreement. | Retail Services (domestic or international leased circuits) |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|-------------------------------------|--|---|------------------------------|
| Revenue (cont) | | | |
| Interconnection revenue | Revenue received from other Licensees for IRS including one off charges for establishment of PI | Direct to product where possible. Otherwise allocate on the basis of estimated usage as defined by Licensee's PCAM. Revenue earned in advance is to be accrued and applied over the term of the agreement. | Domestic Network |
| International In-payments | In-payments earned from overseas carriers for call termination on domestic networks | Direct to product where possible. Revenue earned in advance is to be accrued and applied over the term of the agreement. | International Network |
| Other telecommunication revenues | All other telecommunication revenues not included above (e.g., customer equipment rentals and sales) | Allocated to the services/activities to which the revenues relate. | Other Activities |
| Income from short term investments | Income from cash etc invested, cash at bank and in hand | Where possible, should be allocated to products/services where accounting records permit direct attribution of an investment to a particular activity, e.g., cash balances from trade debtors should be apportioned on the same basis as trade debtors. Income from pure financial investments which are unrelated to other activities should be allocated to Other Activities. | All |
| Income from fixed asset investments | Income from financial and other investments | Where possible, should be allocated in the same way as the investments to which they relate. Income from pure financial investments which are unrelated to other activities should be allocated to Other Activities. | All |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|---|--|---|---|
| Operating Costs | | | |
| Provision and installation of equipment | Payroll | Allocated directly to the plant group being installed and then attributed to segment using the allocator defined for the fixed asset to which it relates. | Access, Domestic Network, International Network |
| Depreciation | Depreciation | Allocated directly to plant group or support plant group and then attributed to segment using the allocator defined for the fixed asset to which it relates, i.e., wherever assets can be directly allocated to a particular segment, the depreciation costs should be allocated in the same way. | Access, Domestic Network, International Network |
| Maintenance | Payroll, stores and other costs associated with the maintenance and operations of telecommunications network plant and equipment | Allocated directly to the plant group or support plant being maintained and then attributed to segment using the allocator defined for the fixed asset to which it relates. | Access, Domestic Network, International Network |
| Systems support | Payroll and other costs associated with work undertaken to support the running of the network | Where possible, these costs should be allocated directly to the services or plant items to which the support services relate based on staff activity analysis, and then attributed to segment using the allocator defined for the fixed asset to which each cost relates. | All |
| Other network expenses | Payroll and other costs associated with network planning, development, provision, installation, management. | Where possible, these costs should be allocated directly to the plant items being supported based on staff activity analysis, and then attributed to segment using the allocator defined for the fixed asset to which each cost relates. R&D costs apportioned based on the purpose of the project. | Access, Domestic Network, International Network |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|-------------------------------|---|---|--|
| Operating Costs (cont) | | | |
| Operator services | Chargeable and non-chargeable operator assistance services | Where possible, allocated directly to the services to which they relate. | Other Activities |
| Marketing and sales costs | Payroll | Allocated directly to services/products where possible, otherwise allocated between products based on labour time or billing revenues or other reasonable basis. | Retail Services |
| Marketing and sales costs | Publicity, advertising, promotions, market research, distributors fees, shop front costs, other | Allocated directly to services/products where possible. Where multiple services are being promoted and marketed, attribute costs based on a reasonable basis as determined by the Licensee. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to the segment's or the service's contribution. | Retail Services, Other Activities |
| Billing and collection costs | Payroll | Allocated directly to products and services where possible, otherwise allocate between products based on labour time. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to each service's contribution. | Access, Domestic Network, International Network, Retail Services, Other Activities |
| Billing and collection costs | Bad debts, outsourced billing services and other billing costs | Allocate directly or indirectly to products and services otherwise allocate between products based on usage (eg number of bills produced) or revenue share. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to each service's contribution. | Retail Services, Other Activities |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|---|---|--|--|
| Operating Costs (cont) | | | |
| Customer service | Customer service staff costs | Allocated directly or indirectly to products and services based on staff activity analysis or reasonable basis determined by the Licensee. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to each service's contribution. | Access, Domestic Network, International Network, Retail Services, Other Activities |
| Payments to other Licensees | Payments for interconnection related services | Allocated directly to products and services. | Retail Services |
| Payments to other operators for international traffic | Outpayments for outgoing international traffic, payments to international satellite consortia | Allocated directly to products and services. | Retail Services |
| Transport costs | Motor vehicle depreciation, leasing costs, insurance, licensing, etc. | Allocated to products and services where possible. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to each service's contribution. | All |
| Overhead support costs | Corporate support costs, HR, finance and support functions, overhead, land, buildings and rent (i.e. that is not attributable to particular segments), general IT costs | Allocated in proportion to each segment's or service's contribution. | All |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|-------------------------|--|--|---|
| Capital Employed | | | |
| Exchange equipment | Local switching equipment | Allocated directly to plant group and then split between Access and Domestic Network in accordance with the definitions provided in Section 6.2 of the Guidelines. | Access, Domestic Network |
| Exchange equipment | Trunk switching equipment | Allocated directly to plant group and then split between Domestic Network and International Network in accordance with the definitions provided in Section 6.2 of the Guidelines. Where switches are shared between segments, costs should be allocated based on seconds of use. | Domestic Network, International Network |
| Exchange equipment | International switching equipment | Allocated directly to plant group and then to International Network in accordance with the definitions provided in Section 6.2 of the Guidelines. | International Network |
| Exchange equipment | Broadband access equipment such as routers, modems, DSLAMs, etc. | Allocated directly to plant group and then split between Access and Domestic Network in accordance with the definitions provided in Section 6.2 of the Guidelines. | Access, Domestic Network |
| Transmission equipment | Local loop equipment | Allocated directly to plant group and then split between Access and Domestic Network in accordance with the definitions provided in Section 6.2 of the Guidelines. | Access, Domestic Network |
| Transmission equipment | Cable and wire | Direct to access or network components where possible, otherwise allocate on the amount of cable used to provide different services. | Domestic Network, International Network |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|--|--|--|--|
| Capital Employed (cont) | | | |
| Transmission equipment | Traffic sensitive transmission equipment | Allocated directly to plant group and then split between Domestic Network and International Network accordance with the definitions provided in Section 6.2 of the Guidelines. Where apportionment is required, it should be on the basis of usage of circuits. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to each segment's or service's contribution. | Domestic Network, International Network |
| Transmission equipment | International submarine cable | Allocated directly to plant group (International Network). | International Network |
| Transmission equipment | International network – other systems such as international radio stations, facility support, network management equipment, etc. | Allocated to plant group and then to International Network based on usage. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to each segment's or service's contribution. | International Network |
| Data/ special services network equipment | Equipment used in the network including modem and network terminating units to enable transmission of different data services, such as packet switching, digital data network, electronic funds transfer, etc. | Allocated directly to plant group and then to segment based on the number of circuits in use for each product. Plant and equipment that is used solely to provide one specific service should be allocated directly to the relevant service. | Domestic Network, International Network, Retail Services |
| Mobile network terminal equipment | Mobile radio equipment, cellular mobile network equipment, paging equipment, etc. | Allocated directly to plant group and then to Retail Services (Mobile Services). | Retail Services |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|--------------------------------|---|---|---|
| Capital Employed (cont) | | | |
| Satellite equipment | All satellite equipment, including satellite earth stations, antennae and other communications equipment. | Allocated directly to plant group and then allocated between Domestic Network and International Network based on the number of channels. | Domestic Network, International Network |
| Customer equipment | Equipment located at the customer premises and connected directly or indirectly to the network including telephones, PABX's, payphones, teleconferencing and videoconferencing equipment and other terminal equipment | Allocated directly to segment. | Other Activities |
| Public payphones | Public payphones and related equipment | Allocated directly to segment. | Other Activities |
| Support Plant | Ducting, power equipment, etc. | Where possible, allocated to the primary plant supported (eg cable/wire) and then allocated to segment in the same way as the primary plant. Where cost driver relationships are difficult to determine ¹ , allocate in proportion to the segment or service contribution. | Access, Domestic Network, International Network |
| Support Plant | Network management systems | Allocated to primary plant based on use of systems to support each plant (eg time spent to control local exchanges, trunk switches, etc.), and then allocated to segment in the same way as the primary plant. Where cost driver relationships are difficult to determine ¹ , costs should be allocated in proportion to contribution of the segment or service. | Access, Domestic Network, International Network |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|--|---|--|------------------------------|
| Capital Employed (cont) - Working Capital | | | |
| Non-network fixed assets | Land & buildings, general computers, motor vehicles, office equipment, etc. | Allocated to products and services where possible. Indirectly attributable cost that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to the segment or service contribution. | All |
| Intangible fixed assets | Intangible fixed assets | Allocated to products and services where possible. Indirectly attributable costs that are difficult to attribute ¹ and unattributable costs should be allocated in proportion to the segment or service contribution. | All |
| Stocks | Stocks | Where possible should be allocated directly to products and services | All |
| Debtors | Trade debtors and other receivables | Should be analysed by type and then allocated to products and services directly based on billing system records or indirectly based revenue. Indirectly attributable amounts that are difficult to attribute ¹ and unattributable amounts should be allocated in proportion to the segment or service contribution. | All |
| Creditors | Trade creditors | Should be analysed by type and allocated to products and services where possible. Indirectly attributable amounts that are difficult to attribute ¹ and unattributable amounts should be allocated in proportion to the segment or service contribution. | All |

Schedule 1: Allocation Methods for Detailed Segment Reporting

| Account Item | Description | Method of Allocation | Principal Segment(s)* |
|--|--|--|------------------------------|
| Capital Employed (cont) - Working Capital | | | |
| Provisions | Provisions, for example, provision for staff bonuses and provisions for maintenance. | Should be allocated to the activities that give rise to the provisions in question where possible. Indirectly attributable amounts that are difficult to attribute ¹ and unattributable amounts should be allocated in proportion to the segment or service contribution. | All |
| Cash | Cash | Cash for operational requirements should be allocated to the segments or services to which it relates. Surplus cash is not allocated. | All |

*This column is provided for illustration only and indicates the principal segment to which the majority of operating costs are likely to be allocated

¹As documented in the Licensee's PCAM which has been approved by iDA.

S2.1 Income Statement for Detailed Segment Reporting

| INCOME STATEMENT for the year ended | 2002 | 2001 |
|--|-------------|-------------|
| | \$ | \$ |
| Revenue from external entities | X | Y |
| Revenue from the Licensee's internal businesses | X | Y |
| Revenue from controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these Guidelines | Y | Y |
| Total Revenue | X | Y |
| Operating costs | | |
| Direct and directly attributable costs | | |
| <i>Variable Costs</i> | | |
| - Transfer charges paid to internal businesses | X | Y |
| - Charges paid to controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these Guidelines | X | Y |
| - Charges paid to other operators | X | Y |
| - Other | X | Y |
| <i>Fixed Costs</i> | | |
| - Transfer charges paid to internal businesses | X | Y |
| - Charges paid to controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these Guidelines | X | Y |
| - Charges paid to other operators | X | Y |
| - Other | X | Y |
| Indirectly attributable costs | | |
| <i>Variable Costs</i> | | |
| - Transfer charges paid to internal businesses | X | Y |
| - Charges paid to controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these Guidelines | X | Y |
| - Charges paid to other operators | X | Y |
| - Other | X | Y |
| <i>Fixed Costs</i> | | |
| - Transfer charges paid to internal businesses | X | Y |
| - Charges paid to controlled entities and/or related entities that are required to report pursuant to Section 2.2(b) of these Guidelines | X | Y |
| - Charges paid to other operators | X | Y |
| - Other | X | Y |
| Allocated unattributable costs | X | Y |
| Total Operating Costs | X | Y |
| Return | X | Y |

Schedule 2: Reporting Formats for Detailed Segment Reporting

S2.2 Reconciliation of Consolidated Income Statement to Audited Income Statement for Detailed Segment Reporting

| Consolidated Income Statement for the year ended | Revenue | Operating costs | Return | Revenue | Operating costs | Return |
|--|---------|-----------------|--------|---------|-----------------|--------|
| | 2002 | 2002 | 2002 | 2001 | 2001 | 2001 |
| | \$ | \$ | \$ | \$ | \$ | \$ |
| Access | x | x | x | y | y | y |
| Domestic Network | x | x | x | y | y | y |
| International Network | x | x | x | y | y | y |
| Retail Services | | | | | | |
| Fixed Line Access | x | x | x | y | y | y |
| Domestic Calls | x | x | x | y | y | y |
| International Calls | x | x | x | y | y | y |
| Domestic Leased Circuit Services | x | x | x | y | y | y |
| International Leased Circuit Services | x | x | x | y | y | y |
| Narrowband Internet Access | x | x | x | y | y | y |
| Broadband Internet Access | x | x | x | y | y | y |
| Mobile Domestic Access and Calls | x | x | x | y | y | y |
| Other Activities | x | x | x | y | y | y |
| Total | x | x | x | y | y | y |
| Adjustments¹ | | | | | | |
| Elimination of inter-segment, controlled entity, and related entity transactions | x | x | x | y | y | y |
| Unallocated revenues (costs) ² | x | x | x | y | y | y |
| Share of results of associates | - | - | x | - | - | y |
| Per Audited Income Statement | x | x | x | y | y | y |

¹ Adjustments will include transactions relating to the business (or group) as a whole and which cannot be attributed to any of the reporting segments, as well as inter-segment transactions, and intra-group transactions (where applicable). All adjustment should be reported by type of transaction.

² Unallocated items should be specified individually. These items will include any costs and revenues which relate to the business as a whole and are therefore not allocated to particular segments. For example, interest received on surplus cash invested. Surplus cash is not allocated in the Statements of Mean Capital Employed, hence the corresponding interest income should also remain unallocated. Similarly, unallocated costs might include interest paid on long term borrowings which relate to the business as a whole and cannot be attributed to individual segments.

S2.3 Statement of Mean Capital Employed for Detailed Segment Reporting

| Statement of Mean Capital Employed as at | 2002 \$ | 2001 \$ |
|---|------------|------------|
| Current Assets | | |
| Cash | x | y |
| Stock | x | y |
| Receivables | x | y |
| Other | x | y |
| Total Current Assets | x | y |
| Non-current Assets | | |
| Primary Plant (e.g., network assets) | x | y |
| Support Plant (e.g., power plant) | x | y |
| Other Investments | x | y |
| Other | x | y |
| Total Non-current Assets | x | y |
| Total Assets | x | y |
| Current Liabilities | | |
| Accounts Payable | x | y |
| Borrowings | x | y |
| Provisions | x | y |
| Other | x | y |
| Total Current Liabilities | x | y |
| Non-current Liabilities¹ | | |
| Accounts payable | x | y |
| Provisions ² | x | y |
| Total Non-current Liabilities | x | y |
| Total Liabilities | x | y |
| Mean Capital Employed | x | y |
| Return on Capital Employed | x% | y% |

¹ Long term borrowings and any tax liabilities and standard provisions generally included in the Licensee's Balance Sheet that relate to the business as a whole, should be excluded from the mean capital employed calculations, because these items relate to the business as a whole and not to individual segments. Unallocated items should be included as reconciling items in the Reconciliation of Consolidated Statement of Mean Capital Employed (see S2.4).

² Includes any provisions that can be attributed to a particular segment. Provisions refer to any standard provisions that are generally included in a Licensee's Balance Sheet.

S2.4 Reconciliation of Consolidated Statement of Mean Capital Employed for Detailed Segment Reporting

| Consolidated Statement of Mean Capital Employed as at | 2002 | 2001 |
|--|----------|----------|
| | \$ | \$ |
| Mean capital employed | | |
| Access | x | y |
| Domestic Network | x | y |
| International Network | x | y |
| Retail Services | | |
| - Fixed Line Access | x | y |
| - Domestic Calls | x | y |
| - International Calls | x | y |
| - Domestic Leased Circuit Services | x | y |
| - International Leased Circuit Services | x | y |
| - Narrowband Internet Access | x | y |
| - Broadband Internet Access | x | y |
| - Mobile Domestic Access and Calls | x | y |
| - Other Activities | | y |
| Consolidated Mean Capital Employed | x | y |
| Adjustments¹ | | |
| Long term borrowings | x | y |
| Provision for deferred tax | x | y |
| Provision for dividends payable | x | y |
| Unallocated dividends receivable | x | y |
| Unallocated assets/liabilities ² | x | y |
| Net Assets Per Audited Balance Sheet | x | y |
| Shareholders Funds Per Audited Balance Sheet | x | y |

¹ Adjustments will include assets and liabilities relating to the business (or group) as a whole and which cannot be attributed to any of the reporting segments. All adjustment should be reported by type of transaction.

² Unallocated items should be specified individually. These items will include any assets or liabilities which relate to the business as a whole and are therefore not allocated to particular segments. For example, surplus cash balances and long term borrowings.

S2.5 Non-financial Information Report for Detailed Segment Reporting

| Service/segment | Usage Parameters to be Reported to IDA |
|----------------------------------|--|
| Access | Number of residential direct exchange lines (DEL) Number of business DEL |
| Domestic Network | Total installed domestic call minutes capacity |
| International Network | Total installed international call minutes capacity |
| Retail Services | |
| Fixed line access | As above for Access |
| Domestic calls | % or number of unsuccessful call attempts Number of connected calls Number of call minutes |
| International calls | % or number of unsuccessful call attempts Number of connected calls Number of call minutes |
| Narrowband Internet access | Number of dial up Internet access subscribers Number of leased circuit Internet access subscribers Average monthly hours of use per dial-up subscriber |
| Broadband Internet access | Number of Broadband Internet access subscribers Installed capacity for Broadband Internet access |
| Mobile domestic access and calls | Number of subscribers Number of calls Number of call minutes Total installed switch call minutes capacity |

S3.1 Income Statement for Simplified Segment Reporting

| INCOME STATEMENT for the year ended | 2002 \$ | 2001 \$ |
|--|------------|------------|
| Total Revenue | X | Y |
| Operating Costs | | |
| Direct and attributable* costs | | |
| <i>Variable costs</i> | X | Y |
| <i>Fixed costs</i> | X | Y |
| Allocated unattributable costs | X | Y |
| Total Operating Costs | X | Y |
| Return | X | Y |

*including directly attributable and indirectly attributable costs

S3.2 Reconciliation of Consolidated Income Statement to Audited Income Statement for Simplified Segment Reporting

| Consolidated Income Statement for the year ended | Revenue | Operating costs | Return | Revenue | Operating costs | Return |
|---|---------|-----------------|--------|---------|-----------------|--------|
| | 2002 | 2002 | 2002 | 2001 | 2001 | 2001 |
| | \$ | \$ | \$ | \$ | \$ | \$ |
| Segment | | | | | | |
| Fixed Domestic Services | x | x | x | y | y | y |
| International Fixed and Mobile Services | | | | | | |
| Mobile Domestic Services | x | x | x | y | y | y |
| Narrowband Internet Access | x | x | x | y | y | y |
| Broadband Internet Access | x | x | x | y | y | y |
| Other Activities | x | x | x | y | y | y |
| Total | x | x | x | y | y | y |
| Adjustments¹ | | | | | | |
| Elimination of inter-segment transactions | x | x | x | y | y | - |
| Unallocated revenues (costs) ² | x | x | x | - | - | y |
| Share of results of associates | - | - | x | - | - | y |
| Per Audited Income Statement | x | x | x | y | y | y |

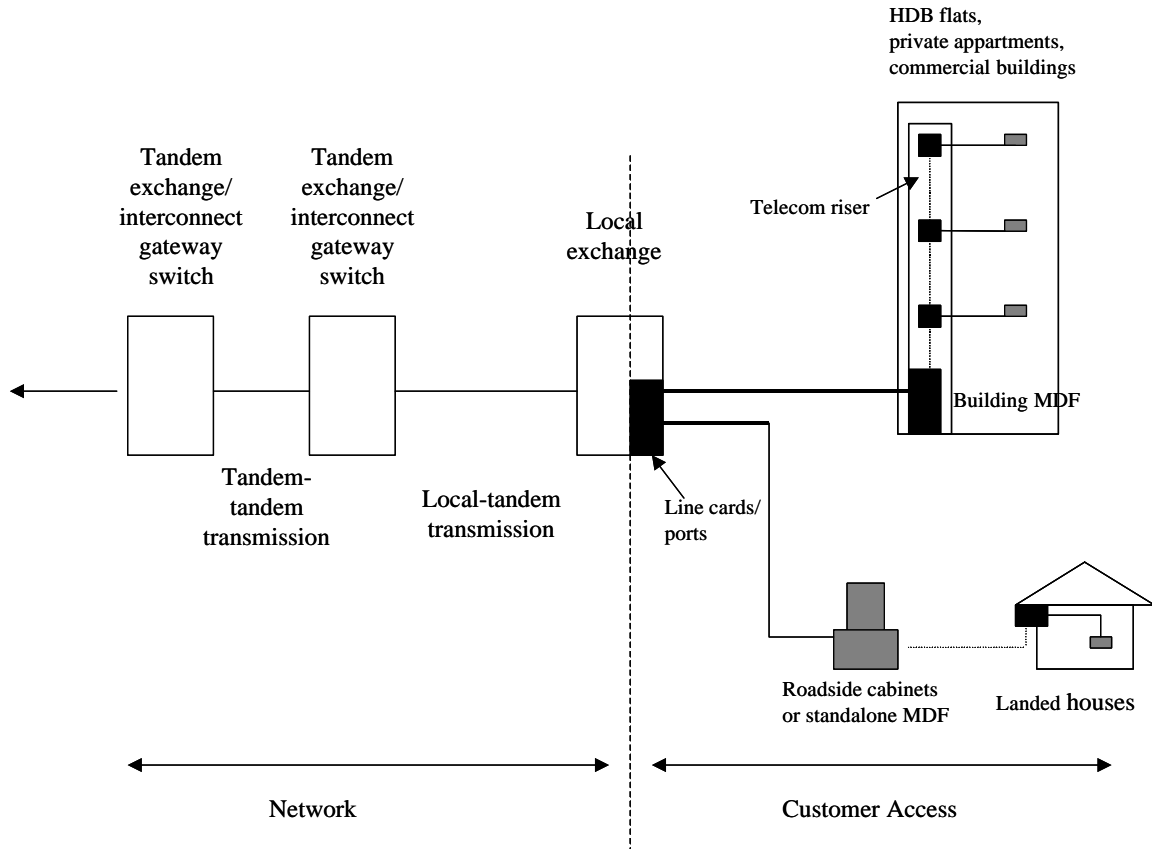
¹Adjustments will include transactions relating to the business (or group) as a whole and which cannot be attributed to any of the reporting segments, as well as inter-segment transactions, and intra-group transactions (where applicable). All adjustment should be reported by type of transaction.

²Unallocated items should be specified individually. These items will include any costs and revenues which relate to the business as a whole and are therefore not allocated to particular segments. For example, interest received on surplus cash invested. Surplus cash is not allocated in the Statements of Mean Capital Employed, hence the corresponding interest income should also remain unallocated. Similarly, unallocated costs would include interest paid on long term borrowings

S3.3 Non-financial Information Report for Simplified Segment Reporting

| Service/segment | Usage Parameters to be Reported to IDA |
|--------------------------------------|--|
| Fixed Domestic Services | Number of residential direct exchange lines (DEL) Number of business DEL |
| Domestic Calls | Total installed domestic call minutes capacity % or number of unsuccessful call attempts Number of connected calls Number of call minutes |
| International Fixed and Mobile Calls | Total installed international call minutes capacity % or number of unsuccessful call attempts Number of connected calls Number of call minutes |
| Mobile Domestic Services | Number of subscribers Number of calls Number of call minutes Total installed switch call minutes capacity |
| Narrowband Internet Access | Number of dial up Internet access subscribers Number of leased circuit Internet access subscribers Average monthly hours of use per dial-up subscriber |
| Broadband Internet Access | Number of Broadband Internet access subscribers Installed capacity for Broadband Internet access |

A1 Illustration of Customer Access and Domestic Network Segments



A2 Illustration of Domestic Network and International Network Segments

