

**M1'S RESPONSE TO MITA'S PUBLIC CONSULTATION ON  
THE PROPOSED AMENDMENTS  
TO THE TELECOMMUNICATIONS ACT ("TA")**

**6 August 2004**

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## **MI'S RESPONSE TO MITA'S PUBLIC CONSULTATION ON THE PROPOSED AMENDMENTS TO THE TELECOMMUNICATIONS ACT ("TA")**

1. M1 welcomes MITA's review of the regulatory regime for the telecommunications industry to ensure its continued relevance in meeting the policy objectives of fair, effective and sustainable competition and maximising the benefits to Singapore's economy. The review is necessary in light of the market developments since full liberalisation in Y2000 and to incorporate the upcoming regulatory changes in the proposed Telecom Competition Code (2004), Telecom Consolidation Guidelines and the Competition Bill.
2. M1 has been providing cellular mobile services to the Singapore market since 1 April 1997 and in August 2000, we launched our international telephone services. In April 2001, M1 also obtained the FBO Licence for the Provision of 3G Mobile Communication System and Services and a 3G Spectrum Right.
3. In general, M1 supports most of the proposed amendments to the TA but would like to suggest some adjustments that are necessary to adequately address certain issues as well as to improve transparency and business certainty.

### **Section 21 - Provision of space and facilities, or installation, plant or system by direction of the Authority**

4. As at end-Jun 04, mobile penetration in Singapore is close to 90%. With the evolution of mobile services into a common and essential means of communication, there is a greater need today to facilitate provision of radio coverage for Public Mobile Telecommunication Services ("PMTS") to serve the public interest.
5. M1 supports MITA's proposal to give IDA the power to direct developers or owners of buildings to provide space and facilities to install telecommunications equipment to serve both that building, and other buildings. Today, the mobile operators are facing increasing difficulty in acquisition of sites for enhancing street level and/or in-building coverage. The provision in Section 21 could facilitate service provision by mobile operators to effectively serve the interests of the public or tenants of the buildings.
6. In light of the above, we propose that the following provisions be incorporated in Section 21:
  - a. Mobile operators should be given the right to use the MDF room to house its equipment.
  - b. In cases where the mobile operator is requested to install radio equipment in buildings to provide radio coverage for that building, the cost of installation should rightly be borne by the building owner and mobile operator should not be charged for space rental.
  - c. Land Transport Authority/MRT line operators should be required to provide equipment room for PMTS at MRT Stations/road tunnels and accord the same treatment as MDF rooms to house the radio equipment needed for mobile coverage in the MRT.

MRT operators should not charge PMTS rental as use of the room is essentially to serve public interest. With Singapore's long-term plan for rail to be the backbone of our public

transport system by 2030, it is prudent to plan ahead and make the necessary provision to ensure and facilitate mobile coverage in the MRT to serve train commuters.

- d. IDA should also be granted the power to set a limit to rentals for equipment room space in commercial buildings to ensure reasonableness of rates for provision of service.
7. In addition to the above, please refer to Annex 1 for our detailed comments.