

8 July 2002

Mr Andrew Haire
Senior Director (Regulatory & Operations)
Info-communications Development Authority of Singapore

Dear Mr Haire

SINGTEL REQUEST FOR REVIEW OF DIRECTION OF 24 JUNE 2002

1. We refer to the direction issued by the IDA on 24 June 2002 (the Direction).
2. This letter serves as a formal request under clause 1.5.9 of the Code of Practice for Competition in the Provision of Telecommunication Services (the Code) for IDA to reconsider the position it takes in the Direction and as a request to grant approval to the amended Schedule 4B attached to this letter as Annexure B for the reasons set out in Annexure A. To the extent that the Direction requires SingTel to submit revised SingTel Proposed RIO Amendments (as defined in the Direction) incorporating the IDA's comments in the Direction, SingTel seeks a stay of the Direction until such time as the IDA has considered this request.
3. We enclose as part of this request:
 - our comments on the general drafting approach and comments in response to Schedule 1 to the Direction (see Annexure A to this letter);
 - a marked up version of Schedule 4B (and associated documents) (see Annexure B to this letter) in which we set out our proposed amendments having regard to the Direction. The revised Schedule 4B also contains explanatory notes indicating justifications for the position adopted by SingTel in response to the Direction; and
 - a marked up version of Schedule 8D (see Annexure C to this letter).
4. SingTel submits that Schedule 4B in the form attached at Annexure B adequately and reasonably addresses the concerns raised in the public submissions and the concerns of IDA as raised in the Direction. We believe the proposed Schedule 4B represents a reasonable compromise protecting the interests of all parties and is now suitable for acceptance.



5. If, after IDA has reconsidered the Direction, further changes are still required, SingTel would appreciate the opportunity to provide a conformed copy of Schedule 4B to the IDA to ensure consistency. In the interim we request that pending the finalisation of the review, IDA will suspend the operation of the Direction.

Yours sincerely

Sean Slattery
Director
Regulatory and International Affairs

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