

IDA ANNOTATION – 13 DECEMBER 2000

SINGTEL RESPONSE – 11 JANUARY 2000

SCHEDULE 8

CO-LOCATION

GENERAL COMMENT

The RIO must specify “the locations at which physical co-location is available”. Sub-section 4.2.1 of Appendix Two of the Code lists the minimum locations that must be made available for co-location. The proposed RIO fails to provide for co-location at telecommunications rooms located in commercial or residential buildings or roof space of exchange buildings. The RIO also must contain:

- (a) procedures that will allow the Requesting Licensee to have “full access (7 days per week, 24 hours per day) to, and physical control over, its equipment” (Code § 5.3.5.5.1);*

SingTel comments : Agreed.

- (b) procedures for virtual co-location, in the event physical co-location is not technically feasible (Code § 5.3.5.5.1);*

SingTel comments : SingTel has provided for virtual interconnection as required by the Code. SingTel does not believe that virtual co-location is necessary.

- (c) a procedure by which SingTel verifies that “it has taken reasonable measures to provide adequate space” for co-location (including re-arranging its equipment in a more efficient manner and, where necessary, upgrading its facilities such as conditioning additional space, optimising use of existing space or finding adjacent space.) (Code § 5.3.5.5.2);*

SingTel comments : Agreed to include a short procedure. See each Schedule.

(d) procedures to allow a Requesting Licensee to physically inspect any location where SingTel claims that space limitations preclude co-location (Code § 5.3.5.5.2); and

SingTel comments : Not agreed to include in the RIO. SingTel will verify with the iDA. The iDA's right of inspection provides adequate protection for the Requesting Licensees. Rights of inspection will increase liability and insurance concerns.

(e) a provision stating that, if space is available, the Requesting Licensee may co-locate "any piece of equipment" that will enable the Requesting Licensee to interconnect. SingTel must revise the proposed RIO to satisfy these requirements.

SingTel comments : Agreed.

SCHEDULE 8

CO-LOCATION

CLAUSE 1 – MODIFICATION REQUIRED

1. GENERAL

CLAUSE 1.1 – MODIFICATION REQUIRED

1.1 This Schedule sets out the terms and conditions under which SingTel will provide the Requesting Licensee with Co-Location Space at the following Co-Location Sites:

- (a) an Exchange Building for a Point of Interconnection (Schedule 8A);
- (b) an Exchange Building for a Point of Access (Schedule 8B);
- (c) a Satellite Earth Station (Schedule 8C);
- (d) a Submarine Cable Landing Station/Frontier Station (Schedule 8D).

Please refer to IDA’s General Comment to Schedule 8.

1.2 The Requesting Licensee may request co-location at sites specified in the COP in addition to those specified or described in Schedules 8A, 8B, 8C and 8D.

1.3 On receipt of a request under clause 1.2 at a site which is specified in the COP, SingTel and the Requesting Licensee will promptly discuss the Requesting Licensee’s request.

1.4 If, thirty (30) Business days after the receipt of a request under clause 1.2 and following discussions under clause 1.3, the Requesting Licensee wishes to pursue co-location at a site referred to in its request, SingTel will commence the formulation of terms and conditions (including amended terms and conditions) to incorporate into this RIO Agreement.

1.5 SingTel will submit terms and conditions formulated under clause 1.4 to the Authority for approval and incorporation into the RIO and this RIO Agreement within sixty (60) Business Days after the receipt of a request under clause 1.2.