IDA ANNOTATION – 13 DECEMBER 2000

SCHEDULE 8

CO-LOCATION

GENERAL COMMENT

The RIO must specify "the locations at which physical co-location in available". Subsection 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); (b) procedures for virtual co-location, in the event physical co-location is not technically feasible (Code § 5.3.5.5.1); (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); (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 (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 RIO Schedule 8 - Co-Location

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.