



13 January 2006

Mr Andrew Haire  
Assistant Director-General (Telecoms)  
Info-communications Development Authority of Singapore

Dear Mr Haire,

**REQUEST FOR RECONSIDERATION OF THE IDA'S DIRECTION DATED 30 DECEMBER 2005 IN RESPECT OF THE MODIFICATION OF REFERENCE INTERCONNECTION OFFER ("RIO") TO INCORPORATE HANDOVER OF TAIL LOCAL LEASED CIRCUITS ("TLLCs") AT THE G.703 INTERFACE STANDARD WITH GROOMING**

1. Singapore Telecommunications Limited (**SingTel**) refers to the direction of the Info-communications Development Authority of Singapore (**IDA**) dated 30 December 2005 (**Decision**).
2. SingTel hereby:
  - (a) requests that the IDA reconsider certain aspects of its Direction pursuant to section 69(1) of the Telecommunications Act 1999 (Cap. 323) (**Act**) and sub-section 11.9.1(a)(i) of the Code of Practice for Competition in the provision of Telecommunication Services 2005 (**Code**) (**Reconsideration Request**) (see Attachment A);
  - (b) submits a revised version of Schedules 7B and 9 of the RIO (see Attachments B and C) – these revised versions incorporate all amendments required by the IDA as part of its Direction, except those which are the subject of the Reconsideration Request; and
  - (c) requests that the IDA stay the requirement for SingTel to amend those provisions of the RIO which are the subject of the Reconsideration Request.

**Reconsideration Request**

3. Section 69(1) of the Act and sub-section 11.9.1(a)(i) of the Code provides that a Licensee that is aggrieved by a decision may within 14 days of the date of the

direction request that the IDA reconsider its decision (**Reconsideration Request**). SingTel is aggrieved by the Direction.

4. SingTel refers to the IDA's general comments in paragraph 3 of Annex 1 of the IDA's Direction, which sets out the amendments that SingTel must make to Schedule 7B. The IDA has made the following statement in paragraph 3(a) of Annex 1:

*“Unless SingTel can provide satisfactory justification for its proposals, SingTel must delete all proposed amendments to distinguish between PTP and PTMP TLLCs, including distinguishing of PTMP circuits into two separate elements of an “A-end Link” and a “B-end Link”.*

5. In this Reconsideration Request, SingTel has sought to provide the IDA with a “satisfactory justification for its proposals” to distinguish between PTMP circuits and PTP circuits for the purposes of grooming and handover using the G.703 interface standard. SingTel requests that the IDA reconsider the amendments to Schedule 7B required under paragraph 3(a) and (b) of Annex 1 of the Direction on the basis of these justifications.
6. The substantive arguments in support of SingTel's Reconsideration Request are set out in Attachment 1.

### **Request for stay**

7. Sub-section 11.9.4 of the Code permits the IDA to stay the effectiveness of a direction, having regard to:
  - (a) the merits of the Reconsideration Request;
  - (b) whether the potential harm to any person outweighs the benefits of allowing the direction to go into effect;
  - (c) the public interest.
8. The following reasons support a stay of the requirement for SingTel to make amendments to those aspects of the RIO which are subject to the Reconsideration Request:



- (a) SingTel has concerns in respect of some of the IDA's specified drafting requirements, all of which are fully justified in Attachment A.
- (b) The IDA's decision on reconsideration would affect the manner in which SingTel provides the TLLC service to the Requesting Licensees and the necessary amendments to the RIO. It makes no sense for SingTel to amend those aspects of the RIO which are the subject of the Reconsideration Request. These amendments may not be necessary or may be varied by the IDA on reconsideration. The finalisation of the RIO will not be subject to unreasonable delays as a consequence of the IDA granting a stay on the terms requested by SingTel. The IDA is likely to make its decision on reconsideration in the shortest possible time.
- (c) The public interest is not affected by a decision to grant a stay on the terms requested by SingTel. TLLCs are not presently being acquired by any person. The public will not be subject to any detriment as a consequence of SingTel being granted a stay. In fact, it is in the public interest to grant the stay to avoid the confusion that would be caused amongst operators if SingTel submitted amendments to the RIO and then these amendments were subsequently reversed on reconsideration by the IDA.

9. Please do not hesitate to contact us if you have any queries or clarifications.

Yours sincerely,

Sean Slattery  
Vice President  
Regulatory & Interconnect Strategy  
Singapore Telecommunications Limited  
Company Registration No.: 199201624D

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