

Response
To
IDA Consultation Paper

**“Proposed Amendments to Singapore
Telecommunications Limited’s
 (“SingTel’s”) Reference Interconnection
Offer (“RIO”) – Provision of Tail Local
Leased Circuits at G.703 Interface
Standards”**

Pacific Internet Corporation Pte Ltd

15 November 2005

89 Science Park Drive
#02-05/06 The Rutherford
Singapore 118261
Tel: 6872 0322
Fax: 6872 5912

RESPONSE TO IDA'S CONSULTATION PAPER ON THE PROPOSED AMENDMENTS TO SINGTEL'S RIO – PROVISION OF TAIL LOCAL LEASED CIRCUITS AT G.703 INTERFACE STANDARDS

1. Introduction

Pacific Internet Corporation Pte Ltd is a wholly owned subsidiary of Pacific Internet Limited and is licensed as a facilities-based operator by IDA. Pacific Internet Corporation Pte Ltd welcomes the opportunity to provide its comments and views to the proposed amendments to the RIO.

2. Comments on Proposed Amendments

(a) Clause 4.7 of Schedule 7B

Singtel should provide an exhaustive list of possible reasons in this clause or in an attached schedule as to why the A-end Link may not be groomed into the existing B-end Links and not leave it open to SingTel's interpretation and discretion.

3. Other comments

In addition, general comments on Schedule 7B are as follows:

(a) Clause 3.1(b) of Schedule 7B

If the TLAR is rejected under clause 3.3, the notification of rejection should be provided no later than five (5) business days since the check pursuant to the clauses 3.3 (a) to (g) can be conducted within five (5) days.

(b) Clause 4.2(i) of Schedule 7B

Please clarify that the deferment fee payable is part of the Installation Charges and not in addition to the Installation Charges.

(c) Clause 4.3 of Schedule 7B

We do not understand SingTel's rationale for not considering any request for deferment of the Service Activation Date as installation work can still proceed and it is only the billing date that is deferred.

(d) General comment

The price of the tail circuit under this schedule is no different from the retail price. So we query the advantage of purchasing wholesale leased circuit as opposed to purchasing on a retail basis.