Confidential Annex A

SINGTEL MARKET SHARE: RETAIL INTERNATIONAL TELEPHONE SERVICES

1. SingTel's market shares in relation to the Retail ITS Market for the periods between December 2003 and July 2005 are documented below.

1.1 December 2003 – June 2004

SingTel's market shares are computed based on the volume of outgoing retail minutes and transit minutes generated over the total industry outgoing retail and transit minutes. The latter is published by the IDA on its website, with no breakdown of total industry outgoing retail vs. total industry transit minutes available for the period December 2003 - June 2004.

TABLE 1

[CONFIDENTIAL]

1.2 July 2004 - July 2005

With effect from July 2004, the IDA published the total industry outgoing retail minutes as well as the total industry outgoing retail and transit minutes.

SingTel's market shares are computed based on the volume of outgoing retail minutes over the total industry outgoing retail minutes.

These figures provide an accurate indication of SingTel's market share in the Retail ITS Market.

TABLE 2

[CONFIDENTIAL]

2. In its Initial ITS Decision, the IDA indicated that:

(a) SingTel's market share in the Retail ITS Market then was in excess of 60%; and

(b) market shares above 40% create a presumption of Significant Market Power (**SMP**) and therefore the need for continued regulation.

3. SingTel's market share for Retail ITS is less than the 40% threshold for presumption of SMP or dominance. For example, SingTel's market share over the last 1 ½ years since July 2004 averages approximately [**CONFIDENTIAL INFORMATION**] and in calendar year 2005, it averages approximately [**CONFIDENTIAL INFORMATION**] only.

4. SingTel submits that the above market share information provides strong grounds for the IDA to remove the continued imposition of the remaining Dominant Licensee obligations on SingTel in respect of Retail ITS.

REQUEST OF SINGAPORE TELECOMMUNICATIONS LIMITED FOR EXEMPTION FROM DOMINANT LICENSEE OBLIGATIONS WITH RESPECT TO THE RETAIL INTERNATIONAL TELEPHONE SERVICES MARKET PURSUANT TO SECTION 2.5.1 OF THE CODE OF PRACTICE FOR COMPETITION IN THE PROVISION OF TELECOMMUNICATIONS SERVICES 2005

Confidential Annex B

TABLE 1

PERCENTAGE OF RETAIL ITS MINUTES GENERATED OVER SINGTEL'S FIXED AND MOBILE LINES AND PAYPHONES APRIL 2000 – SEPTEMBER 2005

(Split in %)

[CONFIDENTIAL]

1. The percentage of Retail ITS minutes generated by customers over SingTel's mobile network, fixed network and payphone network is set out above. This data suggests that customers view mobile phones to be a reasonable substitute for fixed lines when making and receiving international calls.

Confidential Annex B (Continued)

TABLE 2

PERCENTAGE OF RETAIL ITS MINUTES GENERATED BY MOBILE CUSTOMERS PRE-REGISTERED WITH SINGTEL

(Split in %)

[CONFIDENTIAL]

2. The percentage of Retail ITS minutes generated from the mobile customers of mobile operators who have pre-registered with SingTel peaked in the early 2000s and thereafter declined due to the fact that these customers are able to use the IDD services offered by their mobile provider. This data also supports the view that mobile phones are a reasonable substitute for fixed lines when making and receiving international calls.