

Response
to
IDA Consultation Paper

**“Review of the Code of Practice For Info-Communications
Facilities in Buildings”**

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15 April 2005

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RESPONSE TO IDA CONSULTATION PAPER “REVIEW OF THE CODE OF PRACTICE FOR INFO-COMMUNICATIONS FACILITIES IN BUILDINGS”

1. Introduction

1.1 Pacific Internet Corporation Private Limited is a wholly owned subsidiary of Pacific Internet Limited and is licensed as a facilities-based operator by the IDA.

1.2 Pacific Internet Corporation Private Limited (PIC) welcomes the opportunity to provide our inputs to IDA’s proposed revised Code of Practice for Info-Communications Facilities in Buildings (“COPIF 2005”).

2. Comments on Proposed COPIF 2005

Our comments on the proposed COPIF 2005 are as follows:-

General

Legal Agreement with Developer or Owner - We would like to seek IDA’s confirmation that a telecommunication licensee shall not need to enter into any legal agreement with the developer or owner regarding the use of space or facility made available under the proposed revised COPIF 2005.

Use of Rooftop Space - The space or facility required to be made available to telecommunication licensees under the proposed revised COPIF 2005 should include rooftop space to facilitate the fast rollout of wireless broadband access services by non-incumbent telecommunication licensees. The time and other resources needed to negotiate for the use of rooftop space is a key potential obstacle to the quick rollout of wireless broadband access services by new entrants.

Installation of Equipment at Telecommunication Riser – We would like to seek clarification if it is possible for a telecommunication licensee to install their telecommunication installation, plant and system at the Telecommunication Riser, apart from the MDF room or the Telecommunication Equipment Room. For telecommunication services provided over the Ethernet, whereby good performance is limited to a distance of 100m from the switch, some MDF rooms or Telecommunication Equipment Rooms may be located too far away from the end-users for peak performance. Such performance issues could be resolved by installing the switch in the Telecommunication Riser which is located near the end-user. In addition, certain housing estates may not currently have a MDF room. In such an instance, as an interim measure before the MDF room is made available as required under the proposed revised COPIF 2005, the installation of equipment in the Telecommunication Riser should be permitted.

Use of Electrical Riser – We would like to request IDA to consider requiring the developer or owner to made available the electrical riser to telecommunication licensee in the event that the MDF room is fully utilized.

Clause 2.2.1

In the event that the MDF room provided by the developer or owner is full, and a separate space or facility in the building is made available by the developer or owner for use as a MDF room, would Clause 2.2.1 apply to the separate space or facility? We are of the view that Clause 2.2.1 should apply to provide safeguard to the telecommunication licensee and the users of the telecommunication service provided using the separate space or facility.

Clause 2.3.1

Where a developer or owner is currently using the space or facility for any other purpose apart from accommodating the installation, plant and systems of telecommunication system licensees, the developer or owner should be required to discontinue the use of the space or facility for such other purpose by the date the proposed revised COPIF 2005 comes into effect.

Clause 11.3.3.4

The telecommunication licensee should be required to comply with the requirement to remove its connections to the lead-in pipes and/or reposition its manholes within a certain timeframe.

Clause 11.4.1

The telecommunication licensee should be required to comply with the requirement to remove, relocate or alter its installation, plant or system within any space and facilities , if it contravenes any requirement in the proposed revised COPIF 2005, within a certain timeframe.