EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE
WASHINGTON, D.C. 20508

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VIA ELECTRONIC MAIL

Mr. Andrew Haire
Assistant Director-General (Telecoms)
Infocomm Development Authority of Singapore
8 Temsasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

RE: Comments on IDA Consultation Paper: "Handover of Tail Local Leased Circuits under Schedule 7b of Singapore Telecommunications Limited's Reference Interconnection Offer

Dear Mr. Haire,

The Government of the United States appreciates the opportunity to offer comments in the consultation document released July 4, 2005 by the Infocomm Development Authority of Singapore ("IDA") entitled "Handover of Tail Local Leased Circuits under Schedule 7b of Singapore Telecommunications Limited Reference Interconnection Offer"

The United States welcomes IDA's efforts to address the problem of high rates for leased circuit services in Singapore, a key input for competitive telecommunications providers serving Singapore's information-based industries. Steps that IDA has proposed to bring rates in line with other liberalized markets could significantly improve the competitive opportunities for other telecommunications operators and bolster Singapore's goal of developing a more cost-effective infrastructure for information-based industries.

As IDA has noted, however, the technical requirements Singtel introduced in its Reference Interconnection Offer appear to undermine the very the goals that IDA originally outlined in this consultation process, and deserve further review. Specifically, precluding multiplexing as part of the service Singtel offers, and requiring interconnecting carriers to install individual termination units based on an obsolete interface (V35) for every circuit below 1.5 Mbs, appears inefficient and deliberately burdensome. Addressing these impediments thus appears appropriate as a means to ensure reasonable access to Singtel's facilities.

As an alternative to current arrangements, IDA has suggested that interconnecting carriers linking to customers at lower speeds could interconnect with Singtel through a "direct handover" configuration, but might have to install additional equipment that matches the proprietary interfaces on the Singtel end of the circuit. While offered as a potential solution, this proposal raises other concerns that IDA should consider:

- If Singtel, using its existing equipment, can aggregate multiple low-speed tail circuits for interconnecting carriers at a higher speeds using a standard, open interface (i.e., G.703), is there any reason Singtel should not be required do so? How does this issue relate to obligations undertaken in the WTO and FTA to permit interconnection "at any technically feasible point"?

- Is it appropriate for a dominant, incumbent carrier to require interconnecting competitors to conform to the proprietary interface the dominant carrier may have chosen to use, when it is possible to interconnect through non-proprietary interfaces?

- Does requiring interconnecting carriers to invest in matching, proprietary equipment impose an inappropriate burden on competitors?

- Does the general goal of encouraging any-to-any interconnection among competing networks suggest that offering access to networks through a non-proprietary interface is more appropriate?

Based on discussions with the manufacturer of the transmission equipment Singtel uses, it is our understanding that multiplexing capabilities are built into this equipment, and thus, aggregating individual low-speed circuits onto a G.703-based interface should impose no burden on Singtel.

Aggregating multiple end-user circuits for competing carriers by hubbing, multiplexing and 'grooming' such circuits is a standard element of service offerings of many Incumbent Local Exchange Carriers (ILECs) in the United States, under their Special Access tariffs. Such tariffs are available to Singtel in the U.S., which itself offers services in the United States similar to those U.S. carriers are seeking to offer in Singapore.

Sections of a representative tariff filed with the Federal Communications Commission by the National Exchange Carriers Association (NECA)[1] are attached to these comments, and may be instructive to IDA.

It is worth noting that the NECA tariff is applicable to the services offered by the hundreds of small local carriers that operate in the United States who participate in this tariff. While not all ILECs participating in the NECA tariff offer all the services listed, nor are they obligated to, the tariff reflects technical requirements that many of these small, mostly rural carriers in the United States are capable of implementing. Given the nature of the carriers that do choose to take on such obligations in the United States, it is hard to understand why Singtel would not be able to match this minimal level of interconnection.

In the attached documents, the following tariff elements appear directly relevant to the issue IDA is considering:

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[1] NECA is an association that develops and files tariffs on behalf of small local exchange carriers in the United States. For further information, see www.neca.org.

Attachment 1 ("NECA-Special-Access.pdf")[2]:

- Tariff element 7.1.1 , on page 4: (description of bridging/multiplexing arrangements);
- Tariff element 7.2.1 (c) on pages 22-23: (description of bridging)
- Tariff element 7.2.6 (pages 32-33) (description of bridging)

Attachment 2 (NECA-tech-req.)[3]

- Tariff element 15.2.1 (g) on page 35: general technical requirements and technical references, identifying industry-standard interfaces for linking to incumbent carrier's leased circuit services.
- Tariff element 15.2.2 (a) p. 39 interface options for various speeds of service.

In summary, what these documents suggest is that: (a) it may be reasonable to require a dominant local exchange carrier to provide bridging, multiplexing and grooming services as part of its mandatory tariff offerings for leased circuit services; and (b) interfaces that are referenced as part of the tariff should be industry-standard interfaces that do not require carriers to purchase any single suppliers' equipment—facilitating an interoperable, multi-vendor environment where choice of equipment is not an impediment to competitive service offerings.

The United States again appreciates the chance to provide these comments in response to your consultation paper, and would welcome further discussion on the issues addressed here with appropriate officials.

Sincerely,

Jonathan McHale
Director for Telecommunications and E-Commerce
Trade Policy
Office of the U.S. Trade Representative

[2] http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ccb/etfs/bin/binary_out.pl?80065
[3] http://svartifoss2.fcc.gov/cgi-bin/ws.exe/prod/ccb/etfs/bin/binary_out.pl?80073