



1 September, 2005

Mr Andrew Haire
Assistant Director-General (Telecoms)
Info-communications Development Authority of Singapore
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988
Fax: (65) 211 2116

Total number of pages: 02

Dear Mr Haire,

RE: RECONSIDERATION REQUEST OF BRITISH TELECOMMUNICATIONS TO THE IDA DECISION ON THE AT&T/SBC REQUEST PURSUANT TO SECTION 10 OF THE CONSOLIDATION GUIDELINES AND SECTION 11.9 OF THE COMPETITION CODE

1. British Telecommunications (BT) refers to the Explanatory Memorandum issued by the IDA regarding the above subject matter ("IDA Decision") dated 18 August 2005.
2. Section 10 of the Telecom Consolidation Guidelines ("Consolidation Guidelines") states that any licensee or party that is aggrieved by an IDA decision in response to a Consolidation Application may seek reconsideration of the IDA's decision or may appeal to the Minister, pursuant to the procedures in Section 11.9 of the Code of Practice for Competition in the Provision of Telecommunication Services 2005 ("Competition Code").
3. Under Section 11.9 of the Competition Code, any licensee or person (other than a licensee) that is aggrieved by IDA's decision may within 14 days from the day on which IDA issues its decision, either: -
 - (a) Request IDA to reconsider its decision or direction ("Reconsideration Request"); or
 - (b) Appeal to the Minister ("Appeal")
4. BT regards that certain bases and facts used in IDA's analysis of the AT&T/SBC Request warrant a review and accordingly, we hereby respectfully submit this Reconsideration Request to the IDA Decision in accordance with the procedures in Section 11.9.2(a) of the Competition Code.



5. BT must stress to IDA the importance of the impact not only of this AT&T/MCI consolidation, but also of the impact when combined with the proposed merger between MCI and Verizon. These merged entities will have a significant effect on the development of future national and global telecommunication markets. To ignore the impact of these international mergers on Singapore telecommunication markets would place operators and consumers in Singapore at a considerable disadvantage. BT also submits that a number of the assertions made by the merging parties in their reply comments are erroneous and were not subject to review by BT and/or other interveners with a material impact on the final decision. These need to be revisited.

6. BT stands ready to assist the IDA with its review of the AT&T/SBC Request. Please feel free to contact us at any time.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'G. Moir', written in a cursive style.

Gordon Moir
Vice President and Chief Counsel
Commercial, Legal & Regulatory
BT Global Services

A handwritten signature in black ink, appearing to read 'Valerie Tan', written in a cursive style.

Valerie Tan HP
Senior Regulatory Advisor
Commercial, Legal & Regulatory
BT Global Services