

**M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON
PROPOSED ADVISORY GUIDELINES GOVERNING
APPLICATIONS FOR LICENCE ASSIGNMENTS OR
CHANGES IN OWNERSHIP OF A LICENSEE IN
CONNECTION WITH A PROPOSED CONSOLIDATION
(TELECOM CONSOLIDATION GUIDELINES)**

12 November, 2001

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1. M1 welcomes the move taken by IDA in developing the Telecom Consolidation Guidelines as it provides greater clarity and transparency with regards to the implementation of Consolidation Review provisions contained in Section 9 of the Telecom Competition Code. As Consolidations, when left unchecked, could potentially lead to anti-competitive behaviour, M1 appreciates this platform provided by IDA for industry members to feedback on the relevant regulatory issues and help contribute to the development of a competitive telecommunication market.
2. In general, M1 agrees with the framework of the guidelines. By addressing various issues that are important in considering whether a consolidation should be approved, such as the market situation and the impact of the consolidation on the market, IDA has aimed to set up a reviewing process which is fair and transparent to Licensees.
3. However, IDA should clarify some of the terminology and concepts used in the consultation paper, as they tend to be either confusing or rather ambiguous in their definitions. There are also certain areas in the reviewing process that M1 believes IDA could achieve greater transparency.
4. Please find attached, at ANNEX 1, M1's detailed comments from M1's in response to IDA's request for views on the proposed guidelines.