

COUDERT BROTHERS LLP

ATTORNEYS AT LAW

150 YEARS OF EXCELLENCE, INNOVATION AND GLOBAL SERVICE

TUNG CENTRE #21-00
20 COLLYER QUAY
SINGAPORE 049319
TEL: (65) 6222 9973
FAX: (65) 62241756
WWW.COUDERT.COM

ASIA/PACIFIC
ALMATY, BANGKOK, BEIJING, HONG KONG,
SHANGHAI, SINGAPORE, SYDNEY, TOKYO

NORTH AMERICA
LOS ANGELES, NEW YORK, PALO ALTO,
SAN FRANCISCO, WASHINGTON

EUROPE
ANTWERP, BERLIN, BRUSSELS, FRANKFURT,
GHENT, LONDON, MILAN, MOSCOW, MUNICH,
PARIS, ROME, ST. PETERSBURG, STOCKHOLM

ASSOCIATED OFFICES
BUDAPEST, JAKARTA, MEXICO CITY, PRAGUE

DELIVERY BY HAND

6 January 2005

Ms Aileen Chia
Director (Competition and Market Access)
Infocomm Development Authority of Singapore
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

**Re: IDA's Preliminary Decision Regarding the Request of
Singapore Telecommunications Ltd for
Exemption from Dominant Licensee Obligations with respect to the
"International Capacity Services" Market
– APCC Joint Submission**

Dear Ms Chia:

Please find enclosed a joint submission prepared on behalf of the Asia Pacific Carriers' Coalition and with the involvement of AT&T Worldwide Telecommunications Services Singapore Pte Ltd, BT Singapore Pte Ltd, Cable & Wireless Global Pte Ltd, Macquarie Corporate Telecommunications Pte Ltd, MCI WorldCom Asia Pte Ltd, Reach International Telecom (Singapore) Pte Ltd and T-Systems ITC Singapore Pte Ltd.

If you have any queries regarding the joint submission, please contact Sally Ting at her direct line no. 6512 9581.

Yours sincerely,



Sally Ting

Enc

#14868 v1