

**Comments and Proposal  
On  
IDA's Policy Framework For IP Telephony and Electronic  
Numbering in Singapore**

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## **1. Introduction**

- 1.1 This paper is divided into two parts.
- 1.2 The first part consists of comments on some of the points contained in the invitation paper.
- 1.3 The second part as an annex on our proposal regarding the implementation of VOIP numbering service in Singapore. We request this part to be kept in commercial confidence.

## **2. Our Comments on various items in the invitation paper**

- 2.1 Item 44(a)
  - 2.1.1 In our view, deployment of IP telephony in Singapore is unlikely to alter the telecommunication competitive landscape in Singapore in the short term. Singapore is a small country with no national long distance service. As such, there is no compelling reason for making IP domestic calls.
  - 2.1.2 Therefore IP calls and services from Singapore are primarily use for lowering of costs of such communication to either resident of other countries or travellers from Singapore to the countries.
  - 2.1.3 We believe IP telephony will not seriously affect existing service providers in Singapore until there is a standard interoperating agreement between various IP telephony operators in the world much like the accounting arrangement of PTTs today.
- 2.2 Items 44(b) & 44(c)
  - 2.2.1 We agree generally with IDA's regulatory approach towards VOIP. However, we feel that in order to encourage participation and innovative services IDA should not impose more conditions than just the requirement to be licensed as FBO or SBO.
  - 2.2.2 In additional, we hope IDA would keep costs to licensees of VOIP service providers low to encourage participation.
  - 2.2.3 Potential users usually require broadband service before they subscribe to VOIP service. In order to encourage more users to take up VOIP service, perhaps IDA could review the conditions impose Singtel that all ADSL application need to have a Fixed line number. This is an unfair practice to bundle the fixed line service with broadband service.

2.3 44(d)

2.3.1 We agree with IDA's proposed phased approach towards assigning new number levels to FBO and SBO licensees for IP Telephony services. We are of the opinion that, without the availability of a killer application, potential IP telephony users are travellers from Singapore and non-Singapore residents that have requirements for calls from Singapore or Singapore telephone number. The requirements for new number levels from the above source of users would not take up the 10 million numbers in the near future, if at all. At such, we are of the opinion that limiting the level "3" numbers to only users with valid Singapore address will restrict the growth of VOIP service providers.