



**INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY OF SINGAPORE**

**PUBLIC CONSULTATION PAPER**

**DECOMMISSIONING OF CO-LOCATION SITES OFFERED UNDER  
SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE  
INTERCONNECTION OFFER**

**25 January 2007**

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## **DECOMMISSIONING OF CO-LOCATION SITES OFFERED UNDER SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER**

**25 January 2007**

### **PART I: OBJECTIVE**

1. IDA would like to seek comments on a proposed approach to address the potential barriers to network deployment by Requesting Licensees ("**RLs**") as a result of Singapore Telecommunications Limited's ("**SingTel**") recent public announcement of its plans to consolidate its existing exchanges over time.

### **PART II: INTRODUCTION**

2. Currently, SingTel is required under its Reference Interconnection Offer ("**RIO**") to offer co-location spaces at its exchanges to enable RLs to access:
  - Tower Sites – Schedule 5B;
  - For Point of Interconnection purposes – Schedule 8A;
  - For Point of Access purposes – Schedule 8B; and
  - Submarine Cable Landing Stations – Schedule 8D.

Under the terms and conditions of SingTel's RIO, SingTel is required to provide at least six months prior written notice if SingTel intends to terminate a co-location licence because of closure of a co-location site, where such closure is within SingTel's reasonable control.

3. On 29 June 2006, at SingTel Investor Day 2006, SingTel announced that it has plans to consolidate its existing exchanges ("**SingTel's Announcement**"). In its announcement however, IDA understands that SingTel did not provide any details as to which of its current exchanges will be decommissioned, or what will be the estimated timeframes for the commencement/completion of the decommissioning exercise.
4. Following SingTel's Announcement, IDA has received feedback from several licensees voicing their concerns regarding SingTel's decommissioning plans. Essentially, the licensees claimed that the lack of specific details from SingTel on its exchange consolidation plans would increase their business risks and adversely affect their network rollout plans to SingTel's exchanges to access and obtain Interconnection Related Services ("**IRS**"), since any investment in network deployment by an RL to an exchange would have to be written off if that exchange is decommissioned shortly after the RL has completed its rollout to that exchange.

**Question 1**

*Do you agree that SingTel's Announcement to consolidate its exchanges without specific details identifying the exchanges and the decommissioning timeframes would significantly affect your network deployment plans to co-locate in SingTel's exchanges? Please state your views clearly and explain why and how it will/will not affect your network deployment plans, taking into account the existing requirement of at least 6 months' written notice period.*

**PART III: PROPOSED APPROACH**

5. Notwithstanding IDA's above request for further comments as to whether SingTel's Announcement will/will not affect RLs' network deployment plans, IDA's preliminary view of the matter is that it is more than likely that such network deployment plans will be affected as a result of the uncertainties thus created by SingTel's Announcement, and that the current notice period of at least six months may be insufficient to address the RLs' reservations in obtaining co-location spaces in SingTel's exchanges going forward. That said, IDA is also mindful of the fact that the consolidation of exchanges may be inevitable as SingTel, like many network operators around the world, continuously upgrades its circuit-switched telecoms network towards a packet-switched IP based network in order to stay competitive. Therefore, as network technologies evolve, SingTel should have the flexibility to plan and manage its network accordingly to take advantage of the latest technologies to ensure it remains efficient, including the decommissioning of its exchanges where necessary.
6. Therefore, to achieve a reasonable balance between the valid considerations applicable to both the RLs and SingTel, IDA intends to adopt an approach which would require SingTel to propose amendments to its RIO, i.e., Schedule 5B, 8A, 8B and 8D (whichever is applicable), for IDA's approval as soon as practicable once SingTel has affirmed its plans to decommission a particular exchange. In its proposed amendments, SingTel must specify:
  - (i) the exchange that will be decommissioned,
  - (ii) the estimated timeframe which that exchange is expected to be decommissioned, and
  - (iii) the "absorbing" exchange(s), i.e., the exchange(s) that would be subsuming the network coverage area of the decommissioned exchange, where applicable.
7. In addition, SingTel must make available to RLs the revised network boundaries of the "absorbing" exchange(s), within a reasonable time after it submits its proposed amendments to IDA, should it be unable to do so earlier at the time of submission. RLs will then be able to request for the revised network boundaries in accordance with the existing procedure in Annex 8B.3 in Schedule 8B of SingTel's RIO.

8. The proposed RIO amendments should also be submitted to IDA at least **18 months** prior to the estimated date which that exchange is expected to be decommissioned. If a period of shorter than 18 months is required, SingTel must provide full justifications why a shorter notification period is necessary.
9. For the avoidance of doubt, where SingTel currently may have affirmed plans to decommission one or more exchanges over the next 18 months or less, the 18 months' notification period requirement would not be applicable. Instead, SingTel must propose the RIO amendments as specified in paragraphs 6 and 7 for such exchange(s) within one month from IDA's adoption of the proposed approach, save that the notification period should be no less than the existing RIO requirement of at least 6 months.

**Question 2**

*What are your views regarding the proposed approach? Is the information to be provided by SingTel sufficient? What other information will be necessary? Please explain and justify your views clearly.*

**Question 3**

*Is the notification period of at least 18 months reasonable? Please explain and justify your views clearly.*

**Question 4**

*Are there any other considerations relating to this review that IDA should consider, over and above those mentioned in the above questions?*

**PART IV: INVITATION TO COMMENT**

10. All submissions must reach IDA before **12 Noon** on **26 February 2007**. A hardcopy and a softcopy, preferably in Microsoft Word format, must be provided. Respondents are required to include their personal or company particulars, correspondence address, contact number and email address in their submissions. IDA will make public all or parts of any written submissions made in response to this Consultation Paper and disclose the identity of the source. Any part of the submission that is considered commercially confidential must be clearly marked and placed as an annex to the comments raised. IDA will take this into account in its assessment.

11. All submissions must be addressed to:

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

Please submit your softcopy via email to [Tan\\_Si\\_Ying@ida.gov.sg](mailto:Tan_Si_Ying@ida.gov.sg). You may submit the hardcopy to fax number: **(65) 6211-2116**.