

## ASIA PACIFIC CARRIERS' COALITION

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2 August 2007

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

**BY FAX & EMAIL**  
Fax No.6211 2116

Dear Mr Haire

**Re: Consultation Paper issued by IDA on the Proposed Regulatory Framework for Telephony Services over WBA Networks and Interconnection Framework for Telephony Services**

The Asia Pacific Carriers' Coalition (APCC) welcomes the opportunity to comment on the above noted consultation document and would respectfully request that the iDA consider this letter as the submission of the APCC.

The APCC is an industry association of global and regional telecommunications carriers operating in Asia Pacific, formed to work with Governments, National Regulatory Authorities (NRA's) and Consumers to promote open market policies and best practice regulatory frameworks throughout the Asia Pacific region. This letter reflects the opinion of the majority of APCC's members.

The APCC believes that the matters raised in the consultation are important ones with the potential to impact greatly the telecommunications market in Singapore. However, we would note that a number of the matters raised in this consultation are extremely complex, involve dependencies and are still subject to significant debate around the world.. As an example, the issue of whether IP Voice Networks should follow a Bill and Keep or Calling Party Pays pricing model is still not settled.

The APCC also notes that the current plan to deploy a Next Generation Network under the iN2015 Master Plan will have an impact on a number of the matters raised in this consultation.

As a result, the APCC respectfully submits that a consultation in this format at this particular time is not the most effective way forward. Instead, the APCC would suggest that the iDA organize an industry wide forum or workshop to discuss and explore the issues once further details are

available regarding the Next Generation Network deployment under the iN2015 Master Plan. The APCC believes that such a workshop would enable the organisation, its members and all other interested parties to make a substantial contribution ensuring that Singapore stays at the forefront of the industry's development in this area.

Yours sincerely

A handwritten signature in blue ink, which appears to read "Asia Pacific Carriers' Coalition". The signature is written in a cursive style and is positioned above a horizontal blue line.

Secretariat  
Asia Pacific Carriers' Coalition