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December 3, 2007

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

Subject: Comment on request by Singapore Telecommunications Limited (Singtel) for exemption from dominant licensee obligations with respect to the business and government customer segment and individual markets pursuant to sub-section 2.5.1 of the code of practice for competition in the provision of telecommunication services 2005

Dear Sir,

Following up the comment submission regarding the request by Singtel for exemption from dominant licensee obligations, we think that it is better if Singtel is still having its dominant licensee obligations, because the definition of "End Users" in the business and government customer segment should be clarified. If Singtel is allowed to exempt its dominant licensee obligation then the competition in lower market segment might become non-competitive. This is due to the reason of Singtel existing coverage that is already nation-wide compared to other existing carrier/operator. This might create a condition where the carrier/operator that used to be able to offer service in the lower market segment will have to compete directly with Singtel. We think that it is best if the regulation stay the same as now to enable market segment differentiation.

That is our comment regarding Singtel exemption request. We hope that the regulation will at the end give benefit to the market in general and still maintain good competition condition between existing and new carriers/operators.

Sincerely Yours,



Allen Widjaja
Director

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