



3 December 2007

Mr Andrew Haire  
Deputy Director-General (Telecoms)  
Infocomm Development Authority of Singapore  
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Dear Sir,

**RE: REVIEW OF THE CODE OF PRACTICE FOR INFO-COMMUNICATIONS FACILITIES IN BUILDINGS (COPIF) FOR THE NEXT GENERATION NATIONAL BROADBAND NETWORK (NGNBN)**

We refer to the IDA consultation paper issued on 20 November 2007 inviting comments and views relating to the proposed changes to the COPIF. We welcome the move from recommended code of practice to mandatory requirement and are pleased to see some of our earlier discussion reflected in the paper.

The consultation paper does not, however, cover the full breadth of the COPIF nor does it directly reference sections of the COPIF. We would reflect our view that there are specific areas that need detailed review including reservation in Risers. Failure to place the Fibre Cabling System on the same regulatory footing will hamper the take-up of services and reduce the economic benefits of the NGNBN.

Failure to specify standards will prevent the development of the NGNBN to the required speeds in the out-years by allowing low-cost/high loss installations that will not meet the required throughput.

To this end we have already presented the following points to the IDA previously and would repeat them in this response to the above mentioned consultation paper and by reference to the sections of the COPIF:

- Sections 1, 2 and 3 require very little change.

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- Section 4:
  - Increases in the capacity of tray and duct to enable the new cabling system to be properly supported are now included in the IDA consultation paper;
  - This still requires detailed technical change throughout this section;
  - Developer records would then be required to include the routing and distance of blown fibre tubes [or fixed fibres], and the tubes would require to be labelled at both ends – this has not been specified in the consultation paper; and
  - The methods and certificates of testing would also be required to be included.
  
- Section 5 [Lead-in pipes]
  - Provisions for lead-in pipes now appears to be sufficient, but should be reviewed by the IDA teams for future planning needs; and
  - There are a number of practical issues relating to this section that need to be re-drafted [e.g. the use of wooden mandrills is not feasible and should be removed].
  
- Section 6 [MDF room]
  - The minimum space requirement appears to be sufficient for BCS, new Cabling System and TF; and
  - The power requirements are also sufficient on the basis that either BCS will be connected or new cabling system and we welcome the specification of two power sockets.
  
- Section 7 [Telecoms Equipment Rooms]
  - Will need to include 2 lead-in pipes for the new cabling system to be added to the table at 7.9.
  
- Section 8 [Risers]
  - Will require a specification for new cabling system to be developed; and
  - Will require a separate break-out on each floor for the new cabling system.
  
- Section 9 [Internal wiring]
  - We welcome the adoption of Cat6 cabling; further work will be required within the COPIF to specify recommended distribution schemas.
  
- Section 10 [BCS]
  - Needs a section for the new cabling system covering at least the following items:
    - Acceptable loss levels
    - Installation options [fixed/blown fibre]



- Installation standards
  - Resilience
  - Termination
  - In-premises presentation
- 
- Annexes
    - Will all need reviewing and amending to cater for a new cabling system.

We trust that you find this detailed response helpful; BT will be pleased to discuss further with the IDA or review drafts of the proposed amended COPIF as it is developed.

Thank you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stella Teng Lih Ling', written over a horizontal line.

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