
REVIEW OF THE CODE OF PRACTICE FOR INFO-COMMUNICATIONS FACILITIES IN BUILDINGS (“COPIF”) FOR THE NEXT GENERATION NATIONAL BROADBAND NETWORK

**Submission by StarHub Ltd to the Info-communications
Development Authority of Singapore**

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A. Introduction

StarHub appreciates the opportunity to comment on the proposed changes to the COPIF to take into account the requirements of the Next Generation National Broadband Network ("NGNBN").

StarHub has been a full participant and a pre-qualified bidder in IDA's NGNBN project. We believe that, in order to facilitate the rollout of the NGNBN, and to ensure that end-users are able to access NGNBN services, it is important to ensure that buildings and individual units possess the requisite telecommunications infrastructure.

StarHub therefore supports IDA's proposed changes to the COPIF. StarHub has previously provided substantial feedback to IDA on the revised COPIF (in 2005) and assumes that IDA will take those comments into account as part of IDA's on-going review. We have therefore confined our comments largely to the proposed changes in IDA's 20 November 2007 consultation document and related issues.

B. Detailed Comments

1 Section 3.5 of the Revised COPIF (2005)

Section 3.5 of the Revised COPIF (2005) states that *"an owner of a single-unit landed house who does not require basic telephone services and/or cable services for the building shall not have to provide the relevant space and facilities"*.

However, in IDA's latest proposed changes dated 20 November 2007, IDA appears to have revised its position, and has now made it mandatory for owners of such premises to provide the relevant (and additional) space and facilities. StarHub would therefore seek IDA's confirmation that it is mandatory for owners of such premises to provide the requisite space and facilities for the provision of basic telephone and cable services, and that Section 3.5 of the Revised COPIF has been superseded.

2 Internal Wiring & Cabling Distribution System for Single & Multiple Landed units of Landed Residential properties

StarHub supports IDA's proposed changes to the COPIF.

However, StarHub would propose that, in addition to the proposed 2 x 50 mm lead-in pipes and additional 1 x 50 mm pipe (for NGNBN), IDA also require developers and/or owners to provide an additional 2 x 50 mm lead-in pipes to be provided between the gate pillar and a point just before the road-side drain.

As IDA has demonstrated during the NGNBN Civil Works Trial Site Visit at Holland Close, it is possible that the NGNBN NetCo might want to employ micro-trenching in its rollout, as well as deploy its infrastructure along road-side drains. StarHub therefore submits that requiring building owners to provide lead-in pipes that terminate above ground or just below ground would facilitate network rollout by both the NGNBN NetCo and existing operators.

StarHub would note that if an operator deploys its infrastructure using either micro-trenching or along drains, it may not be feasible for the operator to connect to lead-in pipes that are buried in the ground (typically 1 metre below ground-level).

3 COPIF Requirements should be made a pre-requisite to issuance of Temporary Occupation Permit (“TOP”)

With the growing importance of (and demand for) data services, StarHub believes that it is critical to ensure that all mandatory telecommunications facilities are provided and that they meet the required specifications. StarHub has encountered instances where such facilities were not adequately provided, or not installed according to specifications, resulting in the building owner having to carry out costly rectification works (or being denied access to StarHub’s services).

It is necessary for such infrastructure to be installed properly during the construction phase of the building. This responsibility should fall on the building contractors/developers and consultants. StarHub would therefore propose that the mandatory COPIF requirements be made a pre-requisite to the issuance of the TOP. This would ensure that such works are properly carried out before the premises are handed over to the owners, and therefore provide owners with some level of protection against “sub-standard” work. This approach would also help to ensure that all premises in Singapore have access to NGNBN and other telecommunications services.

4 Internal Wiring & Cabling Distribution System for Multi-storey Multi-tenanted Residential Properties

StarHub supports IDA’s proposed changes to the COPIF requirements for such premises.

C. Conclusion

StarHub supports IDA’s proposed changes to the COPIF. However, we believe that rollout of the NGNBN can be better facilitated with the provision of lead-in pipes that are terminated above or just below ground-level, and before the road-side drain. We also believe that given the importance of the telecommunications services, the proper and adequate provision of telecommunications infrastructure should be made a pre-requisite to the issuance of the TOP.