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

**REVIEW OF THE CODE OF PRACTICE FOR INFO-COMMUNICATIONS FACILITIES IN BUILDINGS ("COPIF") FOR THE USE OF SPACE AND FACILITIES BY LICENSEES**

We refer to IDA's public consultation on the above, issued on 5 February 2009.

StarHub is, in principle, agreeable to IDA's proposals. However, we believe that there is a need for further improvement to the alternative proposed in Paragraph 2.3(a) of IDA's consultation paper.

Paragraph 2.3(a) states that "licensees who wish to connect their pipes to the lead-in pipes of a new building shall be required to consult each other in good faith to allow the number of lead-in pipes that each shall connect". StarHub submits that it is impractical for licensees to "consult each other" as the consultation process would have to take place for each and every new building. We believe that this is cumbersome, and may inevitably lead to delays to the licensees' network rollout.

StarHub would therefore propose that IDA stipulate the maximum number of lead-in pipes each licensee can pick up. Specifically, StarHub would propose that each licensee be able to pick up no more than one-third of the available lead-in pipes, and where any licensee requires more than the one-third limit, that licensee would be required to justify its needs to IDA.

For avoidance of doubt, if there are more than 2 licensees interested in connecting the lead-in pipes, then at least 10% of the lead-in pipes (or at least 1 lead-in pipe) should be set aside before computation of the one-third limit.

StarHub believes that this proposal will ensure that licensees will be able to obtain connection to buildings expediently and also reduce the amount of co-ordination amongst licensees.



We appreciate the opportunity to provide feedback on IDA's consultation paper, and thank IDA for its consideration of our proposal.

Yours sincerely

For and on behalf of

**StarHub Ltd**

A handwritten signature in black ink, appearing to read "TG", written over a horizontal line.

Tim Goodchild

Head (Regulatory)

