

RAJAH & TANN LLP
Transnational Legal Solutions

4 Battery Road #26-01
Bank of China Building, Singapore 049908
Tel: +65 6535 3600 Fax: +65 6538 8598
24 Hour Hotline: +65 9690 2253
info@rajahtann.com | www.rajahtann.com

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Sender's Name	Rajesh Sreenivasan	Sender's Ref	RSN/ASH/fbm/308688/00001
Sender's Fax	6438 5227	Recipient's Ref	-
Sender's DID	6232 0751	Recipient's DID	-
Sender's Email	rajesh@rajahtann.com	Date	29 May 2009

BY HAND & EMAIL

INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE

8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988

Attention: Mr Andrew Haire
Deputy Director General (Telecoms & Post)

Dear Sir

**ASIA PACIFIC CARRIERS' COALITION - SUBMISSION ON IDA CONSULTATION ON
RESALE OF LEASED CIRCUIT SERVICES AND INTERNATIONAL SIMPLE RESALE
SERVICES**

On behalf of the Asia Pacific Carriers' Coalition ("APCC"), we hereby enclose APCC's submission to iDA's Consultation on Resale of Leased Circuit (RLC) Services and International Simple Resale (ISR) Services.

Please feel free to contact the undersigned if any clarifications are required.

Thank you.

Yours faithfully



Rajesh Sreenivasan
Rajah & Tann LLP

Enclosure

**Submission by the Asia Pacific Carriers' Coalition
in response to iDA's
Public Consultation on the Proposed Revisions to the Regulatory Requirements on
the Resale of International Leased Circuits and International Simple Resale**

BACKGROUND

This submission is provided by the Asia Pacific Carriers' Coalition (APCC) in response to the 29 April 2009 invitation of the InfoComm Development Authority of Singapore (iDA) to comment on the proposal to revise the existing terms and conditions for resale of leased circuit (RLC) services and international simple resale (ISR) services.

The APCC is an industry association of global and regional carriers operating in the Asia Pacific region, formed to work with governments, national regulatory authorities and consumers to promote open market policies and best practice regulatory frameworks throughout the Asia Pacific region that will support competition and encourage new and efficient investment in telecommunications markets.

This submission, made by the APCC, reflects the opinion of the majority of its members.

SUMMARY OF COMMENTS

The APCC is supportive of iDA to remove the restrictions on RLC and ISR. The APCC is of the same view with iDA that such a move will increase competition and boost Singapore's position as a hub as both data and voice traffic would be able to be routed through Singapore to reach non-liberalised countries.

Currently, licensees are unable to provide the service in Singapore if they have difficulties in obtaining the required documentary support, or alternatively they have to settle with non-optimum routing within their network in order to be regulatory compliant. The market for International leased capacity services and voice services are relatively mature and there are ample alternatives available, so the restrictions no longer serve its original intended purpose.

The APCC is also of the same view as iDA that the Telecom Competition Code is sufficient in addressing anti-competitive behaviour on RLC and ISR services and hence there is no need for other restrictions to be put in place.

In short, the APCC always welcomes moves towards a more liberalized and less restrictive regulatory environment which promotes fair competition. Therefore the APCC supports iDA's proposal to remove the restrictions on RLC and ISR.