

13th Nov 2010

Aileen Chia (Ms)

Deputy Director-General (Telecoms & Post)

Infocomm Development Authority of Singapore

8 Temasek Boulevard

#14-00 Suntec Tower Three

Singapore 038988

Dear Mdm

Comments on Consultation Paper on Net Neutrality

1. According to point 18 of your consultation paper, you mentioned that “IDA has not observed any instances of blocking or discriminatory treatment of legitimate Internet content by ISPs.....”
2. I would like to clarify that this statement is inaccurate. I have been the victim of ISP degrading my traffic to video streaming protocols. I have a slingbox in the United States and that it will stream video through the Internet. I first noticed discriminatory treatment when I was with Starhub. Subsequently I moved to M1 and to NTT Internet. My Internet traffic has been throttled by all 3 Internet Service Provider.
3. NTT has launched an investigation on my case and they have told me that they suspect Starhub(whose cable network they are using) are throttling my traffic. I am since waiting for a satisfactory resolution to my case.
4. My point is that if you allow network management, staffs of ISPs should be trained properly and apparently staffs are not trained properly.
5. Also, since I am paying for Internet access of a certain speed, I should be assured of this speed. ISP should have taken this into account in their cost calculation.
6. As more and more bandwidth intensive applications are launched in the near future, there is nothing stopping ISPs from shaping these bandwidth intensive applications unless there are net neutrality rules in place.
7. Therefore, in order for innovation to prosper in Singapore, net neutrality rules must exist. The internet is too important a tool for ISP to self-regulate.

Recommendation of Cool Down period for contract signing

8. You mentioned in your proposal that natural competition would ensure that ISP will provide the best possible service. However, this is a flaw in this logic. ISPs have been locking in customers with long term contracts. This skews the competition landscape.
9. Although ISPs are required to disclose how they shape traffic, consumers do not really understand how it is done or how it affects them.
10. Therefore, I suggest that there is a cooling down period after customers sign a contract with the ISP so that customers will experience first-hand how traffic shaping really affect them.
11. Alternatively, if network neutrality rules are in place. Customers get exactly what they pay for and therefore ISP would not need to implement a cooling down period after signing a contract.

Yours Sincerely

Cheong Kok Foong Desmond