

29 December 2010

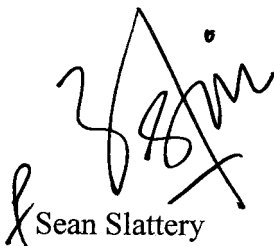
Ms Aileen Chia  
Deputy Director-General (Telecoms & Post)  
Info-communications Development Authority of Singapore

Dear Ms Chia

**IDA CONSULTATION ON ALLOCATION OF AN ADDITIONAL 2 x 5 MHz OF  
1800 MHz SPECTRUM**

1. SingTel Mobile Singapore Pte Ltd (**SingTel Mobile**) refers to the consultation paper issued by the IDA on 3 December 2010 on the proposed allocation of an additional 2 x 5 MHz of 1800 MHz spectrum
2. SingTel Mobile's views and comments are enclosed in Annex 1.

Yours sincerely

  
Sean Slattery

Vice President

Regulatory & Interconnect Strategy

*For and on behalf of SingTel Mobile Singapore Pte Ltd*



**SINGTEL MOBILE SINGAPORE PTE LTD**  
**RESPONSE TO CONSULTATION PAPER ON ALLOCATION OF**  
**AN ADDITIONAL 2 x 5 MHz OF 1800 MHz SPECTRUM**

**1. INTRODUCTION**

- 1.1 SingTel Mobile Singapore Pte Ltd (**SingTel Mobile**) refers to the Information Communications Development Authority of Singapore (**IDA**) consultation paper dated 3 December 2010 on the allocation of an additional 2 x 5 MHz of 1800 MHz spectrum (**Consultation Paper**).
- 1.2 SingTel Mobile is licensed to provide public cellular mobile telecommunications services (**PCMTS**) in Singapore and has acquired 2G Spectrum Right(s) to provide 2G mobile services and 3G Spectrum Right(s) to provide 3G mobile services. SingTel Mobile also acquired Wireless Broadband Access (**WBA**) Spectrum Right(s) and is licensed to provide wireless broadband services.
- 1.3 SingTel Mobile is committed to the provision of state-of-the-art mobile telecommunications services and technologies in Singapore. As a leading provider of mobile telecommunications services over GSM and 3G networks, high speed data services through GPRS and HSDPA technology and wireless services on our WiFi platforms, SingTel Mobile has a strong interest in the allocation of spectrum in the 1800 MHz frequency band.
- 1.4 SingTel Mobile welcomes the opportunity to make this submission on the Consultation Paper and the various issues identified by the IDA.
- 1.5 SingTel Mobile would be pleased to clarify any of the views and comments made in this document, as appropriate.



## 2. SINGTEL MOBILE'S RESPONSE

### *Making available additional 1800 MHz spectrum*

- 2.1 SingTel Mobile supports the allocation of an additional one (1) lot (i.e. 2 x 5 MHz) of 1800 MHz spectrum (**Additional 1800 MHz Spectrum**) for the provision of PCMTS.
- 2.2 SingTel Mobile notes that with the proposed allocation of the Additional 1800 MHz Spectrum, there will be two (2) spectrum lots available for temporary, trial or experimental uses; one (1) lot (i.e. 2 x 5 MHz) of 1800 MHz frequency spectrum and one (1) lot (i.e. 2 x 5 MHz) of EGSM frequency spectrum. Given this, there should be little or no concern over the allocation of one (1) lot (i.e. 2 x 5 MHz) of 1800 MHz frequency spectrum.
- 2.3 However, SingTel Mobile believes that rather than requiring the spectrum grantee to cooperate and negotiate in good faith with third parties on the use of frequencies during major events, the party that obtains frequency for temporary/trial usage purposes should have the obligation to demonstrate/ensure that their temporary /trial use will not cause any interference. SingTel Mobile notes that the spectrum grantee has paid a commercial / market price to use the spectrum; hence, there should be no requirement that the grantee has to offer third parties the use of the frequency or to accommodate trials or temporary use at the risk of interference with its own commercial service. Rather, any party that is running a trial (i.e. not a commercial service) should endeavour not to cause interference with the operations of an existing PCMTS operator.

### *Proposed Allocation Framework*

- 2.4 SingTel Mobile generally supports the proposed parameters to be adopted for the allocation of the Additional 1800 MHz Spectrum.
- 2.5 SingTel Mobile does not believe that there should be a need to cater for allocation of the Additional 1800 MHz Spectrum to any other operators apart from the existing PCMTS operators. As the IDA itself points out, there is little likelihood of an operator being able to install and deploy a PCMTS network using the Additional 1800



MHz Spectrum; SingTel Mobile therefore agrees that the allocation exercise should be limited to the existing PCMTS operators.

- 2.6 SingTel Mobile agrees with the proposed duration of the spectrum right, i.e. from 31 March 2011 till 31 March 2017, such that it expires with the existing PCMTS Spectrum Rights and the 1800 MHz Spectrum Right.
- 2.7 SingTel Mobile agrees with the proposed lot size of the spectrum.
- 2.8 SingTel Mobile agrees that the existing PCMTS operator should be allowed to pick the lot that they wish to obtain.
- 2.9 In relation to use of the Additional 1800 MHz Spectrum, SingTel Mobile agrees with the IDA that the operator should be allowed to use the Additional 1800 MHz Spectrum to offer *other services such as WBA using any available technology as long as* the operator has met the requirement to provide PCMTS. In this regard, SingTel Mobile seeks the following:
  - (a) clarification from the IDA as to how it will determine whether an operator has met the requirements to provide PCMTS;
  - (b) confirmation from the IDA that the requirement will apply to all the PCMTS, frequency spectrum, whether 900 MHz or 1800 MHz frequency spectrum, that has already been assigned to PCMTS operators as there is no logical reason to treat one (1) lot of 1800 MHz frequency spectrum differently from another; and
- 2.10 SingTel Mobile notes that the IDA proposes a Reserve Price of S\$400,000 for the Additional 1800 MHz Spectrum to be allocated in this exercise; this is an increase of S\$100,000 over the Reserve Price applicable in the case of the 1800 MHz Spectrum Right of 2009 and the PCMTS Spectrum Rights of 2008. SingTel Mobile further notes that in its decision and explanatory memorandum relating to the 1800 MHz Spectrum Right in 2009, the IDA had set the Reserve Price at \$300,000 for the 2 x 5 MHz lot of 1800 MHz frequency spectrum, i.e. the Reserve Price was the same as that used for the 2 x 5 MHz lots of frequency spectrum granted with the PCMTS Spectrum



Rights; this was to ensure that operators will not be able to obtain the 1800 MHz Spectrum Right on terms better than those relating to the PCMTS Spectrum Rights.

2.11 We therefore submit that the IDA should also structure the impending allocation exercise such that the terms of the exercise are no worse-off as compared to those applicable for the 1800 MHz Spectrum Right and the PCMTS Spectrum Rights. Furthermore, given that the duration of the spectrum right for the impending auction is only 7 years, i.e. shorter than those for the 1800 MHz Spectrum Right and the PCMTS Spectrum Rights, SingTel Mobile submits that the IDA should in fact revisit the proposed Revised Price. SingTel Mobile therefore proposes that:

- (a) the IDA should consider reducing the Reserve Price to less than S\$300,000; or otherwise
- (b) the IDA should set the Reserve Price to be no more than S\$300,000 for one (1) lot of 2 x 5 MHz 1800 MHz frequency spectrum