



StarHub Ltd
(Reg No. 199802208C)
67 Ubi Avenue 1
#05-01 StarHub Green
Singapore 408942
Tel: (65) 6825 5000
Fax: (65) 6721 5002

1 August 2011

Ms Aileen Chia
Deputy Director-General (Telecoms & Post)
Infocomm Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

By Email:
IDA_Consultation@ida.gov.sg

By Fax: 6659 2502

Dear Ms Chia,

CONSULTATION ON NUMBER AUCTION FOR PREFIX NUMBER "6" AND "8"

We refer to the Authority's consultation paper on the above matter. The response of StarHub Ltd ("StarHub") is set out below.

Question 1

IDA invites views and comments on whether IDA should conduct Number Auction for prefix number '3'.

StarHub submits that it would be unnecessary to conduct a Number Auction for prefix number "3" at this time. There would be a cost and disruption associated with such an auction, and there is currently relatively little demand for this number level. We believe that a Number Auction should only be held when demand exceeds supply, and that this state-of-affairs is not present for prefix number 3.

Question 2

IDA invites views and comments on whether the proposed quantity of 100 new number levels for each prefix number is appropriate.

We believe that the current number block of 10,000 numbers is efficient and appropriate. There are no indications of any significant problems in allocating number ranges in 10,000 number blocks. We also submit that it would be administratively inconvenient if numbers were allocated in blocks of 100 numbers, and that such an arrangement could have significant cost implications for operators. In particular, if 100 number blocks are adopted for level "6" and "8" numbers, operators would have to reconfigure their switches and number management system. There would be significant cost implications of such a step. We do not believe that the benefits from moving to 100 number blocks would outweigh the costs involved.



Question 3

IDA seeks views and comments on the proposed number auction rules and arrangement.

We have no comments on the proposed number auction rules and arrangement for number levels.

Please do not hesitate to contact me, should anything in this letter require clarification or elaboration.

Yours Sincerely,
For and on behalf of
StarHub Ltd

A handwritten signature in black ink, appearing to be "T. Goodchild".

Tim Goodchild
Head (Government & Strategic Affairs)