



**CONSULTATION PAPER ISSUED BY
THE INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY OF SINGAPORE**

**PUBLIC CONSULTATION ON THE PROPOSED CODE OF PRACTICE FOR THE
PROVISIONING OF COAXIAL CABLE HOME NETWORKING (“CCHN”)
SOLUTIONS**

18 March 2013

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PART I: INTRODUCTION

- 1 On 2 September 2011, IDA invited views and comments on a proposed set of Guidelines for the Provisioning of CCHN Solutions (“**Proposed Guidelines**”). The Proposed Guidelines were for the purpose of ensuring that CCHN solutions deployed by telecommunication licensees will perform in accordance with the IDA Reference Specification for CCHN, and the continued performance of existing services that are operating over the Broadband Coaxial Cable System (“**BCS**”) with minimum service disruption.
- 2 At the close of the public consultation on 7 October 2011, IDA received comments from 3 respondents, including Sigma Designs Technology Singapore, SingNet Pte Ltd and StarHub Ltd. IDA thanks the respondents for their views and comments.

PART II: IDA’S POSITION ON KEY ISSUES IN RELATION TO THE DEPLOYMENT OF CCHN SOLUTIONS

SECTION 1 – Regulatory Framework on CCHN Solutions

- 3 In the consultation, a respondent submitted that a code of practice be issued by IDA to ensure compliance with proper practices/procedures as stated in the Proposed Guidelines. This is to ensure that the existing services carried by the BCS would not be affected. The same respondent also added that a CCHN Reference Specification is not sufficient as compliance is only voluntary and non-compliance of the CCHN specification would also affect services carried by BCS.
- 4 IDA understands that where a CCHN solution is not properly installed, it not only affects existing cable services to the end-user whose premise has been installed with the CCHN solution, it could also affect cable services of neighbouring end-users. Considering the potential impact, there is a need to ensure that proper installation, operation and maintenance of CCHN solutions are carried out by telecommunication licensees who offer such solutions. In this regard, IDA intends to issue a code of practice. The proposed code of practice would also govern the interaction (e.g., resolution of interference and resolution of disputes) between the telecommunication licensee who offers the

CCHN solution and any telecommunication licensee that is delivering services and/or operating over the BCS (“**BCS Operator**”).

- 5 With regard to the CCHN specification, IDA has considered the respondent’s comment and is of the view that conformity of equipment with the requirements set out in the Reference Specification for CCHN (IDA RS CCHN Issue 1, Jul 2011) will reduce the possibility of interference or interruption to existing services over the BCS. As such, IDA intends to convert the Reference Specification for such equipment to a Technical Specification (IDA TS CCHN) for mandatory compliance.
- 6 To further enhance the framework related to the deployment of CCHN solutions, IDA also intends to allow dealers¹ of CCHN devices to supply such equipment to telecommunication licensees only (i.e. Facilities-Based Operator licensees and Services-Based Operator licensees). IDA further proposed to require dealers to comply with the above sale condition using the proposed code of practice.

SECTION 2 – Location of Isolation Filters and Access to Distribution Taps

- 7 A respondent requested that isolation filters be installed at distribution taps to ensure proper isolation of CCHN solutions and to facilitate faster identification of sources of interference due to any improper installation or equipment failure. On the other hand, another respondent proposed that isolation filters be installed within homes where coaxial splitters were located with no necessity for the filters to be installed at distribution taps. The respondent was concerned about the ability to gain access to the distribution taps outside the homes.
- 8 IDA is of the view that there are merits in requiring all isolation filters be installed at distribution taps (with or without a tap box) as a standard practice for efficient fault localisation and isolation. While the installation of isolation filter at the distribution taps is the preferred option, IDA recognises that it is not the only means and there may be challenges for telecommunication licensees who wish to offer CCHN Solutions to gain access to the distribution taps which may be connected to the networks of BCS Operators.
- 9 In IDA’s opinion, this preferred option should not result in BCS Operators denying reasonable access to the CCHN solution providers. Where reasonable access is not provided, IDA is prepared to also allow the deployment of isolation filter in homes. This is in recognition that IDA will be tightening its control over the deployment of CCHN solution on multiple fronts (e.g., approval of CCHN devices, imposing

¹ For the above purpose, IDA intends to impose additional dealers’ licence condition(s) to restrict sale of such CCHN equipment to only Facility-Based Operators and Service-Based Operators licensed by IDA.

mandatory requirements via the proposed code and allowing CCHN devices to be sold by dealers to licensees only) which should significantly reduce the instances of any careless installation or improper usage that will impact the cable services.

- 10 Accordingly, both options would be included into the proposed code for compliance with the industry. Notwithstanding the above, to steer the industry to preferred option, IDA has requested StarHub Cable Vision Ltd ("**StarHub**"), the current BCS Operator, to come up with its proposed terms and conditions ("**T&Cs**") to facilitate access by other telecommunication licensees to the distribution taps where its network may be connected, for the purpose of installing isolation filters at such distribution taps and to seek the views of potential CCHN Solution providers. IDA hopes that the parties will negotiate in good faith and agree on the T&Cs for the above access so as to implement the preferred option.

SECTION 3 – Other Requirements

- 11 Comments were also received proposing to amend some other aspects of the Proposed Guidelines including the suitability of home configurations, minimum conditions for deployment of CCHN solutions, general setup process and Appendix A (Post-installation verification process). Where these comments are valid, reasonable and in-line with IDA's policy consideration, IDA intends to make the necessary amendments.

PART III: PROPOSED CODE OF PRACTICE FOR THE PROVISIONING OF CCHN SOLUTIONS

- 12 As highlighted above, IDA has given careful consideration to the views and comments submitted in each of the responses. Having assessed the responses together with IDA's overall policy objectives, IDA intends to issue a code of practice. The content of the proposed code of practice substantially mirrors the Proposed Guidelines, save for the changes mentioned in the above paragraphs. IDA would like to now invite comments and views on the proposed Code of Practice for Provisioning of CCHN Solutions ("**Proposed Code**"). For completeness, the proposed Technical Specification (IDA TS CCHN) for mandatory compliance is also provided as background information.
- 13 Separately, parties who are interested to find out more about StarHub's proposed T&Cs for access to distribution taps, may contact Mr Timothy Goodchild of StarHub at email address: timothy@starhub.com for more details.

PART IV: PROCEDURE AND TIMEFRAME FOR SUBMITTING COMMENTS

- 14 All submissions should be clearly and concisely written, and should provide a reasoned explanation for any proposed revisions. Where feasible, submissions should identify the specific provision of the Proposed Code which the comments relate to. Where comments include suggesting revisions to the text of the Proposed Code, the respondent should clearly indicate the specific changes in language being proposed.
- 15 All submissions should reach IDA by 12:00 noon, 8 April 2013. Comments must be submitted in soft copy (preferably in Microsoft Word or PDF format) with the email header "Public Consultation on the Proposed Code of Practice for the Provisioning of CCHN Solutions", to this email: IDA_Consultation@ida.gov.sg. All comments should be addressed to our Ms Aileen Chia, Deputy Director-General (Telecoms & Post).
- 16 IDA reserves the right to make public all or parts of any written submission and to disclose the identity of the source. Respondents to the consultation may request confidential treatment for any part of the submission that the commenting party believes to be proprietary, confidential or commercially sensitive. Any such information should be clearly marked and placed in a separate annex. If IDA grants confidential treatment, it will consider (but will not publicly disclose) the information. If IDA rejects the request for confidential treatment, it will return the information to the respondent and will not consider this information as part of its review. As far as possible, respondents should limit any request for confidential treatment of information submitted. IDA will not consider any submission that requests confidential treatment of all, or a substantial part, of the submission.