

Dear Ms Chia,

We refer to your Consultation Paper on the review of the Code of Practice for Info-communication Facilities in Buildings.

We are property managers and our roles include managing building facilities on behalf of building owners. We would like to participate in the public consultation. Our comments are mainly relating to existing commercial buildings.

Section 1: Provision of Space and Facilities to Facilities-based Operators who are licensed to provide Public Mobile Telecommunication Services

(a) Provision of additional space for MTOs

We are of the view that the proposed requirements for PMDS should only apply to new development, and not mandatory to existing buildings. It will be difficult for existing building owner to expand existing MDF room or create additional spaces for PMDS due to site constraints, structural limitation, capital expenditure, GFA considerations among others. The MTO/Telecommunication Licensees should bear the capital cost for such expansion if such additional spaces are deemed required and requested by them.

To be fair to all parties, rental and service charges for the spaces used by MTOs shall be chargeable basing on fair market value, and if requested by the MTO/Telecommunication Licensees, such charges should be valued by independent valuer. The fees of the valuer shall be borne by the requester.

(b) Access to Telecommunication Risers, Cable Trays and Underground Pipeline System

For proper administration, we would propose that IDA should step in to govern the allocation of spaces within the riser, trays, underground pipeline system and within the MDF room. It will be easier for Building Owner to administer the allocation of space basing on the written approval from IDA before allowing the respective parties to commence work.

For the above to be effective, access to the risers / MDF Room must be strictly controlled by the Building Owner, and such access should not be unreasonably withheld. The MTO/Telecommunication Licensee should not be allowed to hold any keys to these areas. They must also be held responsible for cleaning up and making good any damages caused such as fire stops, paintwork, plasters, etc. during their course of work. Prior to commencement of works, the requestor should have a joint inspection with the Building Owner's representative to determine the existing conditions, and upon completion, another joint inspection should be conducted to close up the matter.

Section 3: Location of Main Distribution Frame Room and Telecommunication Equipment Room

- (a) As 1st storey area is most critical and valuable for commercial properties, and substantial areas have already been set aside for frontage, power feeder, fire safety, waste disposal, entrances/exits, drive-in etc., we would propose that the authorities should consider allowing the MDF Room to be located at the 2nd storey onwards or within a multi-storey carpark. Separate access can be designed during the planning stage.

Section 7: Provision of Electrical Distribution Panels and Accessories in the relevant space and facilities

- (a) We would propose that Building Owner should only be responsible to provide isolators within the MDF. Each telecommunication licensees should be responsible to open an electricity account with the electricity retailer, including providing the necessary distribution panels and metering. The number of isolator and the minimal capacity of each isolator should be stated in the COP and any further upgrading required shall be borne by the requester.
- (b) The telecommunication licensees should also be contributively responsible for the power consumption for the lighting, air-conditioning and/or mechanical ventilation within the MDF Room as these facilities are solely used by them. The minimal cooling load / air change

should be stated in the COP and any further upgrading required shall be borne by the requester.

Thank you.

Regards,

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