

Ms Aileen Chia,  
Deputy Director-General (Telecoms & Post)

Dear Mdm

**Re: Public Consultation on the Review of COPIF**

With reference to the above, my comments are stated as follow in blue.

**SECTION 1 – Provision of Space and Facilities to Facilities-Based Operators who are Licensed to Provide Public Mobile Telecommunication Services**

*(1) IDA invites views and comments on:*

*i. Whether the COPIF should be amended to allow MTOs to deploy installation and plant in the PMDS of a Development for the purpose of providing public mobile telecommunication services such as 2G and 3G services to that Development. If not, what are the practical and economically viable alternatives to ensure mobile coverage within that Development; (Comments; Yes! COPIF should be amended to allow MTOs to deploy installation and plant in the PMDS of a Development for the purpose of providing public mobile telecommunication services. If not, MTOs should allow to fully utilizing all unused open space in the building areas as PMDS, such as unused parking space, unused covered landscape .... )*

*ii. Whether the COPIF should be amended to allow MTOs to deploy installation and plant in the telecommunication risers, cable trays/metal trunking and underground pipeline systems within a Development for the purpose of providing public mobile telecommunication services, such as 2G and 3G services, to that Development. If not, what are the practical and economically viable alternatives to ensure mobile coverage within that Development; (Comments; Yes! COPIF should be amended to allow MTOs to deploy installation and plant in the telecommunication risers, cable trays/metal trunking and underground pipeline systems within a Development for the purpose of providing public mobile telecommunication services. If not, should allow fully utilize the staircase landing areas, ceiling areas and lift shaft areas in the building areas. )*

*iii. Whether the proposed space requirements (in Tables 1 and 2) to be set aside for MTOs are sufficient, and whether the basis of determining the space requirements (i.e. total number of units or total usable floor area) is appropriate. If not, what should the basis for the determination of space requirements be and why; (Comments; for Tables 1, the residential units should be more specified and inclusive of type of room such as 1/2/3/4/5 room, EC, condominium or other...as the long-term and short-term forecasts of residential users and the type of usages are differ, For Table 2, the non-residential Development should be more specified the floor usage areas with the type of building, such as Data Centre, Commercial buildings, Industrial buildings and Offices blocks, as*

*the long-term and short-term forecasts of business activities, users and usages are differ for each type of buildings.)*

iv. *What other space could be considered as PMDS and what criteria should be used in designating a space as PMDS;(Comments; all unused and safe open space, external wall and ceiling space could be considered as PMDS and the criteria is the MTO's equipment should be installed sound and safe for both building structure and peoples around the areas.)*

v. *Whether a cap should be placed on the amount of floor area that a single or a group of similarly-situated Facilities-based Operators may occupy in the MDF Room, TER and PMDS. If so, what would be the reasonable cap(s) and why;(Comments; Nil)*

vi. *Whether the existing requirements (e.g. number of pipes, size of telecommunication risers and cable trays/metal trunking) in COPIF 2008 for telecommunication risers, cable trays/metal trunking and underground pipeline systems within a Development, should be increased for new Developments going forward, to facilitate the deployment of installation and plant by MTOs. If so, what would be a reasonable increase, in terms of absolute size and/or expressed as a percentage of existing requirements. For existing Developments where the necessary increases may not be possible or feasible, what are the possible measures that could be put in place to ensure that PTLs, other Fixed Operators and MTOs efficiently use the limited existing space within telecommunication risers, cable trays/metal trunking and underground pipeline systems within Developments;(Comments; Yes! Based on the existing COPIF 2008 requirement, all telecommunication facilities should be increased by 20 to 40%, it will be much more depending on what kind of usages and type of the buildings, and for the existing Developments it should initial a cleanup exercise to remove all outdated and unused cables and equipment, if possible, to re-arrange the MDF/TER equipment and cabling layout.)*

vii. *Whether the proposed priority order for access to MDF rooms and TERs amongst the PTLs, other Fixed Operators and MTOs (where applicable) is reasonable. If not, what would be the alternatives to ensure that the reasonable requirements and obligations of all relevant parties can be met;(Comments; In order to avoid unnecessary issues which may arise, all PTLs should had an equal right to access into MDF room/TER, and others Fixed and MTOs should had an separated room just next to MDF room/TER.)*

viii. *Whether the proposed priority order for access to telecommunication risers, cable trays/metal trunking and underground pipeline systems within a Development is reasonable. If not, what would be the alternatives to ensure that the reasonable requirements and obligations of all relevant parties can be met;(Comments; Nil)*

ix. *In the event of insufficient space in the relevant space and facilities and there being no other practicable alternatives, should similarly-situated Facilities-based Operators be*

*required to share their installation and plant where feasible to do so. If so, what would be the reasonable basis for sharing and why;*(Comments; Nil)

*x. Whether a set of dispute resolution guidelines will facilitate negotiations between a MTO and an owner of a Development for the rental of building space used in the provision of outdoor mobile coverage beyond the Development itself. If so, what should the scope of the guidelines be and what are the potentially contentious issues that should be addressed? For example, should the Guidelines address disagreements relating to monthly rental rates through the engagement of an independent valuer;*(Comments; Nil)

*xi. Any other considerations that IDA should take into account in its review of this section.*(Comments; Nil)

## **SECTION 2 – Provision of Cables for Telecommunication (Non-Broadband Coaxial Cable) System in all Residential Properties**

*(2) IDA invites views and comments on:*

*i. The proposed replacement of the twisted copper 4-pair cables from the telecommunication riser/gate pillar to each residential unit with a two-core optical fibre cable to a fibre termination point within the residential unit ;( Comments; the mentioned fibre cable may be exposed to weather before enter into house unit, thus the use of fibre cable should be the outdoor type.)*

*ii. The proposed installation of a fibre distribution box at the telecommunication riser on each residential floor of high-rise residential buildings ;( Comments; the design of the proposed fibre distribution box should be standardize as the builders can use one design for all, and the details can be provided in COPIF.)*

*iii. The proposed replacement of twisted copper 4-pair cables (Category 3 or better) to each living room and bedroom with the provision of 1 unshielded twisted pair cable (Category 6 or better) to the living room and each of the bedrooms ;( Comments; Nil.)*

*iv. The proposed installation of RJ11/45 combination outlets instead of RJ11 outlets ;( Comments; as RJ11 Plug can be connected to RJ45 outlet socket, so proposed to use only RJ45 outlets instead of RJ11/45 combination outlets)*

*v. The proposed replacement of the block terminal with an RJ45 patch panel ;( Comments: should use box type patch panel, so that all messy patch chords can be enclosed within the box.)*

vi. Whether the COPIF should require cabling and RJ11/45 combination outlets in addition to those proposed. If so, where should these be located and why;(comments; Nil) and

vii. Any other relevant considerations that IDA should take into account in its review of this section. (Comments; Nil)

### **SECTION 3 – Location of Main Distribution Frame Room and Telecommunication Equipment Room.**

(3) IDA invites views and comments on:

i. The proposal to locate MDF rooms and TERs on the first storey (street-level) in buildings; and (Comment; Good proposal, all new MDF rooms and TERs should build like the Sub-station standard, so less flooding issues will be encountered, however, MDF rooms and TERs must be accessible by users at all time.)

ii. What are the alternatives or measures that should be implemented by the developers or owner of buildings, in the event that it is not possible to locate the MDF room or TER on the first storey (streetlevel) of the buildings? (Comments; the MDF room or TER can be located at 2<sup>nd</sup> or 3<sup>rd</sup> storey of the buildings or build on top of the Sub-station - the design of the MDF room can be discussed with the building Architects.)

### **SECTION 4 – Usage of Cable Trays/Metal Trunking in Buildings**

(4) IDA invites views and comments on:

i. The proposed removal of the designation of cable trays/metal trunking in telecommunication risers for either telecommunication (non-broadband coaxial cable) system or broadband coaxial cable system;(Comments; Nil)

ii. The proposed revision that cable trays/metal trunking in telecommunication risers should be of equal size, and follow the specifications for such facilities as stated in COPIF 2008, for telecommunication (non-broadband coaxial cable) systems;(Comments; To cater for FBOs and MTOs additional requirement, the total sizes of cable trays/metal trunking in telecommunication risers should be increased by 20 to 40% as mentioned above.)

iii. Whether the existing cable tray/metal trunking size requirements for

*telecommunication (non-broadband coaxial cable) systems should be increased in view of potential additional systems that may be deployed to provide telecommunication services to developments, such as better mobile coverage; and(Comments; Yes! the existing cable tray/metal trunking size requirements for Telecommunication (non-broadband coaxial cable) systems should be increased as well.)*

*iv. Whether there are any issues that may arise following the removal of the designation of cable trays for specific systems, such as possible interference issues arising from sharing of cable trays/metal trunking, priority of access to the cable trays/metal trunking amongst the various types of licensees, or measures to ensure efficient use of the cable trays/metal trunking. If so, what are the measures that may be implemented to address these issues?(Comments; Nil)*

## **SECTION 5 – Sealing of underground pipes entering the Main Distribution Frame Rooms, Telecommunication Equipment Rooms and Telecommunication Risers.**

*(5) IDA invites views and comments on:*

*i. For new Developments, the proposed sealing of all underground pipes by developers prior to the handing over of such pipes to telecommunication licensees;(Comments; Good practice, as the same material and standard can be maintenances and less issues may arise before handing over to telecommunication licensees;.)*

*ii. For new Developments, the proposed sealing of underground pipes by telecommunication licensees after cable installation works in buildings;(Comments; Good practice, the completion of new Development will not be delay due to such cabling by telecommunication licensees.)*

*iii. For existing Developments, the proposed sealing by telecommunication licensees of their respective underground pipes and the timeframe for which such works shall be completed;(Comments; the proposed sealing should be implement immediately and only apply to the pipe end within buildings and at Tel Risers, MDF rooms and TERs.)*

*iv. Whether there are other effective measures to address the leakage of foreign gases into MDF rooms, TERs and telecommunication risers; and(Comments; Not lead-in pipes allowed to be inside the MDF rooms and TER, all lead-in pipes will only be allowed to entered into Tel Riser with gas sealing system only.),*

*v. The materials to be used for the sealing of both unused and occupied pipes to prevent gas leakage to MDF rooms, TERs and telecommunication risers.(Comments; used only replaceable and easy handle material only.)*

## **SECTION 6 – Removal of Requirement for Cable Readiness Certification by StarHub Cable Vision Ltd.**

*(6) IDA invites views and comments on:*

- i. The proposed removal of the CRC requirement; and(Comments; Nil)*
- ii. Any other relevant considerations that IDA should take into account in its review of this section(Comments; Nil)*

## **SECTION 7 – Provision of electrical distribution panels and accessories in the relevant space and facilities.**

*(7) IDA invites views and comments on:*

- i. The proposed requirement for the developer or owner of an existing Development to provide, install and test electrical distribution panels and accessories, in the event that charges for utility usage in the MDF room and TER are to be borne by telecommunication licensees.(Comments; Nil)*

Regards

Your faithfully

Low Chee Kiong  
Former IDA Technical Consultant (NGBN)  
51 Fulton Ave  
Singapore 579014  
Email: [cheekiong\\_low@yahoo.co.uk](mailto:cheekiong_low@yahoo.co.uk)  
[Tel:65523328](tel:65523328)  
HP: 92234120

