

To: Info-Communications Development Authority
Attn: Miss Aileen Chia

Dear Aileen,

Our comments are as follow:

1) Section (1), IDA invites views and comments on sub-bullet point (ii)

Our comment: To allow MTOs to deploy installation and plant in the telecommunication risers, cable trays / metal trunking and underground pipeline system within a development - especially the existing ones - for the purpose of providing public mobile telecommunication services, there must have a provision in the COPIF requiring MTOs to be responsible for the cost of repair and reinstatement to the existing building affected by such installation / plant deployments by the MTOs, e.g.: the repair and replacement of ceiling for MTOs to access to the cable tray in the false ceiling.

2) Section (1), IDA invites views ad comments on sub-bullet point (iii)

Our comment: The proposed space requirement set out in Table "1" and "2" to be set aside for MTOs is more than sufficient for allocation of Potential Mobile Deployment Space (PMDS). To optimise the use of the space, MTOs should collectively coordinate, consolidate and group their equipment and plant together, rather than each MTO doing it separately and individually.

3) Section (1), IDA invites views and comments on sub-bullet point (iv)

Our comment: Roof could be considered as PMDS, however, MTOs must be responsible for the erection of trellis screen over the installation works as required by URA (Ref: <http://www.ura.gov.sg/circulars/text/dc04-29.html>), including all necessary electrical distribution panels, wiring and trunking installation works in coordination with the building owner.

4) Section (5), IDA invites views and comments on sub-bullet point (iii)

Our comment: We are in support of IDA's proposal for telecommunication licensees to be responsible for the sealing of their respective underground pipes and such sealing should be done immediately and professionally to prevent ingress of the water into the MDF room, especially for those rooms located at the basement level. The ingress of water through unsealed underground pipes was a cause of basement flooding witnessed in last year's Orchard Road flooding. To ensure accountability, there should be a penalty provision in the COPIF for irresponsible telecommunication licensees who fail to seal the underground pipes.

5) Section (7), IDA invites views and comments on sub-bullet point (i)

Our comment: We opine that for existing buildings where the telecommunication licensees require utilities for the operation of any installation or plants that they deploy, the licensees should be responsible for the cost of the utilities consumption and the installation and testing of the required electrical distribution panels and other accessories.

Regards

Ong Pang Heng
Project Manager
Park Hotel Group
Tel: 65936957
Mobile: 97590488
Fax: 65936969