

## SINGTEL MOBILE SINGAPORE PTE LTD

### RESPONSE TO PUBLIC CONSULTATION ON THE PROPOSED MACHINE-TO-MACHINE (“M2M”) ACCESS CODE ALLOCATION FRAMEWORK

#### 1. INTRODUCTION

- 1.1. SingTel Mobile Singapore Pte Ltd (**SingTel Mobile**) is a leading provider of mobile telecommunications services over 2G, 3G and 4G networks and high speed data services through General Packet Radio Service (**GPRS**), High-Speed Packet Access (**HSPA**), Long Term Evolution (**LTE**) technologies and wireless services on our WiFi platform.
- 1.2. SingTel Mobile is committed to the provision of state-of-the-art telecommunications technologies and services in Singapore and welcomes the opportunity to make a submission in response to the Info-communications Development Authority of Singapore (**IDA**) consultation paper dated 11 April 2013 on the Proposed Machine-To-Machine (**M2M**) Access Code Allocation Framework (**Consultation**).

#### 2. PROPOSED M2M ACCESS CODE ALLOCATION FRAMEWORK

##### M2M Definition

- 2.1. SingTel Mobile supports the definition of M2M as proposed in the Consultation. SingTel Mobile agrees that if voice communication is supported on the M2M device, it should be confined to within a pre-defined service feature and/or within an intended or a closed user group.

##### M2M Number Format, Allocation and Charges

- 2.2. SingTel Mobile supports differential treatment accorded to Facilities-based Operation (**FBO**) Licensees and Service-based Operation (Individual) (**SBO(I)**) Licensees in relation to the allocation of M2M Access Codes.

- 2.3. Similar to the approach adopted by the IDA for the assignment of 3-digit and 4-digit International access codes, SingTel Mobile proposes that eligible FBOs be allocated 4-digit access code (i.e. 144X) for M2M services and allow the eligible FBOs to self-manage the rest of the following digits to form the M2M number.
- 2.4. For SBO(I)s, SingTel Mobile supports the IDA's proposal that 5-digit access code (i.e. 144XX) be allocated for M2M services and allow qualifying SBO(I)s to self-manage the rest of the following digits to form the M2M number.
- 2.5. In terms of charging arrangement, SingTel Mobile proposes that the first 4-digit or 5-digit access code allocated to a FBO or SBO(I) respectively will be without charge. For subsequent 4-digit or 5-digit access codes allocated, a fee of \$10,000 per 4-digit or 5-digit access code will be levied.
- 2.6. In the event that the IDA does not support the proposal that FBOs be allocated 4-digit access codes for M2M services, SingTel Mobile requests that the IDA reserves the remaining 5-digit access codes within a 4-digit block to cater for that FBO's future requirements. For example, in the event that the IDA assigns 5-digit access codes 14410, 14411 and 14412 to FBO A, the IDA should reserve the remaining 5-digit access codes (i.e. access codes 14413-14419) for FBO A's future requirements. This will facilitate the necessary transition arrangements for licensees already allocated a 4-digit access code during the pilot phase.