



VODAFONE RESPONSE TO THE CONSULTATION PAPER ISSUED BY THE INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY OF SINGAPORE ON A PROPOSED MACHINE-TO-MACHINE (“M2M”) ACCESS CODE ALLOCATION FRAMEWORK

Vodafone welcomes comments or questions on the views expressed in this submission. They should be directed to Robert MacDougall at robert.macdougall@vodafone.com

1. Vodafone is at the forefront of the development of M2M services globally. We believe it is vital to ensure an open exchange of views so that important global business models are developed on a sustainable foundation.
2. We recognise the pivotal role that the IDA has to play in realising Singapore's iN2015 vision and welcome the opportunity to respond to this consultation. In so doing, we limit our response to a comment on the requirement for licensees intending to provide M2M services to comply with the M2M Access Code allocation framework when finalised, as set out in paragraph 17 of the consultation paper.
3. We understand the IDA's concern that number resources are used efficiently and optimally. However, we believe that the requirement for the M2M Access Code should not apply where the licensee has notified the IDA of the use of an alternative numbering resource associated with an existing global M2M solution.
4. As integration of an Access Code into an existing global M2M platform results in additional complexity and cost, and could increase lead time for deployment, we believe that such a policy would be a proportionate one in the circumstances. This is especially so since IPv6 is seen as the longer term approach for M2M addressing purposes.
5. Vodafone would be happy to provide the IDA with any further information on this as the IDA may consider appropriate.