



17 June 2013

Ms Aileen CHIA
Deputy Director-General (Telecoms and Post)
Infocomm Development Authority of Singapore ("IDA")
Via Fax: 6211-2116 and Email: IDA_Consultation@ida.gov.sg

Dear Ms Chia,

RESPONSE TO CONSULTATION FOR NETWORK COMPANY PROPOSED CO-LOCATION SPACE & SERVICE IN CO-LOCATION ROOM 1 & CO-LOCATION ROOM 2

1. **Declaration of Interest.** SuperInternet ACCESS Pte Ltd ("SuperInternet") is an SBO(I) licensee and has been providing Internet Access and associated services since 2000. In 2011, SuperInternet commenced offering services on the Next Generation Nationwide Broadband Network ("NGNBN") as a Retail Service Provider ("RSP"). It is our intent to move from an SBO to FBO in the short term and our interest in this proceeding lies primarily in how our costs and provisioning methods for equipment in the Co-Location facilities will be affected.
2. **Heat Load Limitations in relation to scheme for s12.3 Power Charge.** SuperInternet's specific primary concern lies in the methodology for the determination of the Power Charge in s12.3 of Schedule 15. Since the maximum heat load dissipated by the rack is not permitted to exceed 3kW, this effectively limits the maximum power which can be utilized to approximately 3kW as almost all power is converted to heat in such network equipment¹. At the rated 230Vac as stated in s12.3.1, this equates to 13.04Amps. Therefore, if the breaker size is 16A as stated to be the standard size provided for AC power, it is our contention that IDA should take this into account when determining "C" in the formula. Furthermore, where multiple 16A breakers are provided, notwithstanding the total power which could then be drawn, the enforced heat load limit will determine the total actually usable power and therefore the charges for power should be seen as a function of this lower ceiling as opposed to the total power (Amps) provided across all breakers.
3. **Power Tariff discounts and rates.** SuperInternet also seeks to draw the attention of IDA to the fact that the Prevailing Low Tension tariff is not necessarily the rate paid by the operator of the Co-Location facility. In the present regime of contestable supply, several suppliers offer significantly lower rates than what is shown as the Prevailing LT tariff. Even if this is not the case and the basis for the charges is cost recovery, a non-optimized method of operation resulting in a higher cost basis in the first place defeats the legitimacy of such calculations.
4. For clarification on the issue raised, I can be contacted via any of the means listed in the address line below. Thank you.

Regards,

A handwritten signature in black ink, appearing to read 'Benjamin T.P. Tan', is written over a horizontal line.

Benjamin T.P. Tan
Managing Director
SuperInternet ACCESS Pte Ltd

¹ SuperInternet considers some statements to be axiomatic but would welcome a request to substantiate if so required by IDA.