

**M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON
INTERCONNECTION OFFER FOR THE PROVISION OF SERVICES ON
THE NEXT GENERATION NATIONWIDE BROADBAND NETWORK**

**PROPOSED CO-LOCATION SPACE & SERVICE IN CO-LOCATION ROOM 1 &
CO-LOCATION ROOM 2**



17 June 2013

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M1’S RESPONSE TO IDA’S CONSULTATION PAPER ON INTERCONNECTION OFFER (“ICO”) FOR THE PROVISION OF SERVICES ON THE NEXT GENERATION NATIONWIDE BROADBAND NETWORK – PROPOSED CO-LOCATION SPACE & SERVICE IN CO-LOCATION ROOM 1 & CO-LOCATION ROOM 2

1. M1 welcomes the opportunity to submit our views and comments to IDA’s consultation on OpenNet’s proposed set of terms and conditions for the new Schedule 12 – Co-Location Space & Service in Co-Location Room 1 & 2 (“New Schedule 12”).
2. M1’s comments are set out below.

(A) General Comments

Additional cooling service in Co-Location Space

3. We note that the indicative charges for rack space under the New Schedule 12 in IDA’s consultation paper is inclusive of both the charges for additional cooling service and monthly recurring charge for rack space. Under Clause 2.3 (c) of the NetCo Interconnection Code, it is a minimum requirement for the ICO to be modular and allow its Requesting Licensees (“RLs”) to purchase only those Mandated Services it wants to obtain.

The supplementary cooling service will only be required as an additional cooling service on top of the basic air conditioning covered in the ICO should the heat load exceeds the maximum threshold of 1.5kW. There will be equipment which do not require the additional cooling service e.g. passive equipment. Hence, consistent with the intent of the NetCo Interconnection Code, we propose that charges for additional cooling service be evaluated:-

- Separately from rack space; and
- Based on the power consumption after heat load exceeds the threshold of 1.5kW.

(B) Specific Comments

Section/ Clause	Description	M1’s Views/Comments
New Schedule 12 – Co-Location Space & Service in Co-Location Room 1 & Co-Location Room 2		
Section 7.4 & 7.5	<p>“Subject to OpenNet’s agreement on the requested capacity of the Transmission Tie Cable from Requesting Licensee’s FDF to OpenNet’s FDF, OpenNet shall provide, at its own cost:</p> <p>(a) the necessary, in OpenNet’s reasonable opinion, Transmission Tie Cable between the Requesting Licensee’s FDF and the OpenNet’s FDF;</p> <p>(b) installation of the Transmission Tie Cable from the OpenNet’s FDF to the Requesting Licensee’s FDF in the Co-Location Space; and</p> <p>(c) termination of the Transmission Tie Cable to the OpenNet’s FDF.”</p> <p>“OpenNet shall terminate the</p>	<p>Currently, OpenNet can only provide two types of tie cables i.e. 96 and 288 fibre cores, and such limitation is not stated clearly in Schedule 12 and 12C of the ICO. However, the capacity of fibre cores required by RLs is dependent on the number of fibre ports of the equipment installed and this may differ from the two types of fibre cores offered.</p> <p>We are of the view that the capacity of tie cables should not be bound by the limitation of the services offered by a single contractor engaged by OpenNet, which could lead to wastage of resources. For example, if RLs only require 12 fibre cores, only 12 out of 96 fibre cores would be used.</p> <p>In light of the above and the per fibre splice/cores charges in Schedule 15, we submit</p>

<p>Annex 12D</p> <p>Schedule 15, Section 12.14.1</p>	<p>Transmission Tie Cable installed pursuant to clause 7.4 ...”</p> <p>“Co-Location Request/Co-Location Modification Request Form</p> <p>Number of fibre cores: _____ (Insert quantity)”</p> <p>“\$50 per splice”</p>	<p>that RLs should be allowed to request for its required number of fibre cores without any limitation.</p>				
<p>Annex 12E, Section 1.1.2</p>	<p>“The Requesting Licensee shall house only the following rack types in the Co-Location Space:</p> <p>(a) 600mm (Width) by less than or equal to 1000mm (Depth) by less than or equal to 2200mm (Height), these are industry standard 19 inch racks; and/or</p> <p>(b) 800mm (Width) by less than or equal to 1000mm (Depth) by less than or equal to 2200mm (Height), these are based on industry-standard 24-inch racks but incorporates space for cabling and airflow.”</p>	<p>Only rack types for Co-Location Room 2 is captured in Section 1.1.2.</p> <p>As the New Schedule 12 is a proposed set of terms and conditions that covers both existing Schedule 12 for Co-Location Room 1 and Schedule 12C for Co-Location Room 2, we propose that all rack types to be offered in <u>both</u> Co-Location Rooms be included in the New Schedule 12.</p>				
<p>Schedule 15 – Charges</p>						
<p>Section 12.2.2</p>	<p>“The following are applicable for all Co-Location Room 1 and/or Co-Location Room 2 in all Central Office (except Tuas Central Office).</p> <table border="1" data-bbox="327 1406 804 1505"> <thead> <tr> <th>DESCRIPTION</th> <th>CHARGES (\$\$)</th> </tr> </thead> <tbody> <tr> <td>Per Rack Space (for 2 year term)</td> <td>\$xxx/month*</td> </tr> </tbody> </table> <p>...”</p>	DESCRIPTION	CHARGES (\$\$)	Per Rack Space (for 2 year term)	\$xxx/month*	<p>Under the existing Schedule 12 for Co-Location Room 1, the monthly recurring charge for rack space is based on per square metre basis. This is logical as the rental should be lower for smaller rack space. Otherwise, there will be no incentive for RLs to request for smaller rack space when smaller equipment is to be installed.</p> <p>M1 submits that pricing should not be uniform as there are different sizes of rack space in both Co-Location Room 1 and 2. Pricing for different rack sizes should vary according to the space requested. Such pricing should also be no higher than the monthly recurring charges for rack space set out in the existing Schedule 12 and 15.</p>
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Per Rack Space (for 2 year term)	\$xxx/month*					