



19 June 2014

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 ON PROPOSED ALLOCATION OF SPECTRUM FOR INTERNATIONAL MOBILE TELECOMMUNICATIONS ("IMT") AND IMT-ADVANCED SERVICES AND OPTIONS TO ENHANCE MOBILE COMPETITION

1. SuperInternet ACCESS Pte Ltd ("SuperInternet") is an SBO(I) licensee and has been providing Internet Access and associated services since 2000. In 2005, when IDA launched the IP Telephony framework, SuperInternet obtained Level 3 number blocks and interconnected with the existing operators. In 2011, SuperInternet commenced offering services on the Next Generation Nationwide Broadband Network ("NGNBN") as a Retail Service Provider ("RSP"). As at the date of this submission, SuperInternet has applied to move from an SBO to FBO and our interest in this proceeding lies primarily in how our costs, business models and provisioning methods will be affected as we seek to augment our service portfolio with a mobile offering.
2. With specific reference to Question 10a, SuperInternet is keen to enter the market as an MVNO and has been informally pursuing an MVNO relationship with the existing MNOs for several years without success.¹ Our primary intent is to focus on the niche market. Our intended business model has both pre-paid and post-paid services but is not primarily intended for the general consumer segment. It is our view that there are numerous mobile services¹ which are not being actively offered by the current MNOs and it is our aim to bring these to the market. Conversely, we do not see any real economic gain in merely going into a price war on general consumer segments.
3. With reference to Question 10b, it is SuperInternet's view that the viability of a new MNO would be greatly increased if it were allowed to grow from an MVNO. If a new entrant is allowed to establish especially a Full MVNO relationship with an MNO and at the same time, within the appropriate licensing regime, be allocated with its own frequency bands, there exist several technical solutions which effectively result in the functional scenario where the new entrant will use its own Access Network at some locations while using the Access Network an MNO (as an MVNO) where it has yet to deploy. This mode of deployment would significantly lower the barrier to entry for a new MNO. SuperInternet would therefore respectfully request that IDA consider offering spectrum rights in the above scenario. TDD bands would perhaps be a parallel or alternative option for this mode. On a related note, we would also suggest that any terms in an MNO's contract with an MVNO which would prevent such a mode of growth and transition ought to be prima facie deemed a contravention of the Telecoms Competition Code.
4. With reference to Question 11, we would very much welcome the opportunity to deploy as a Full MVNO as opposed to merely being a "Branded reseller". SuperInternet agrees that maximum flexibility to differentiate and therefore compete can only be realized by having full control of the core infrastructure.
5. With general reference to Question 12 and 13, SuperInternet would suggest that the framework also considers the hierarchy of MVNOs and allows for the hosting of MVNOs by MVNOs. This hierarchy is critically important to competition and rapid growth.¹ That is,

¹ Please refer to Annex A (Confidential Information) for details.

a Full MVNO should be allowed to host a medium/light MVNO free from any impediments in its agreement with the MNO; the MNO should not be permitted to insert anti-competitive clauses in its contract which prohibits the formation of a hierarchical tiered structure below the Full MVNO. Furthermore, an MNO should also be prohibited from denying an MVNO the utilization of another MNO's Access Network. (This is technically possible for a Full MVNO. i.e. utilizing the Access Networks of multiple MNOs)

6. For clarification on the issue raised, I can be contacted via any of the means listed in the address line below. Thank you.

Regards,



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