

18 June 2015

CityNet Infrastructure Management Pte Ltd  
(as Trustee-Manager of the NetLink Trust)  
750E Chai Chee Road  
#07-03/05/06  
Technopark@Chai Chee  
Singapore 469005

Attention: Mr Ng Yong Hwee  
Chief Executive Officer

Dear Sirs

**FURTHER DIRECTION OF THE INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY OF SINGAPORE MADE PURSUANT TO SECTION 27 OF THE TELECOMMUNICATIONS ACT (CHAPTER 323) IN RESPECT OF THE REVIEW OF CITYNET INFRASTRUCTURE MANAGEMENT PTE LTD'S (AS TRUSTEE-MANAGER OF THE NETLINK TRUST) INTERCONNECTION OFFER FOR THE PROVISION OF SERVICES OVER THE NATIONWIDE BROADBAND NETWORK**

1. The Info-communications Development Authority of Singapore (“**IDA**”), pursuant to Section 27(1) of the Telecommunications Act (Chapter 323) (the “**Act**”) and Condition 32.1 of the Licence to Provide Facilities-Based Operations issued to CityNet Infrastructure Management Pte Ltd (as Trustee-Manager of the NetLink Trust) (“**NetLink Trust**”) on 22 September 2011 and amended on 1 October 2014, hereby issues this direction to NetLink Trust.
2. Reference is made to the following:
  - (i) The Code of Practice for Next Generation National Broadband Network NetCo Interconnection;
  - (ii) NetLink Trust’s Interconnection Offer (“**ICO**”) incorporating various proposed changes, as submitted by NetLink Trust from 2 June 2014 to 3 June 2014 (“**Draft Revised ICO**”);
  - (iii) NetLink Trust’s letter dated 4 September 2014 with the subject matter “Co-Location Space in New Co-Location Room at Ang Mo Kio Central Office”, submitting its proposed Schedule 12D – Co-Location Space & Service in New Co-Location Room, and associated draft changes to the Main Body and Schedule 18 – Dictionary to the ICO (“**Draft Amended Documents**”) for IDA’s approval;
  - (iv) IDA’s direction to NetLink Trust dated 10 December 2014 (“**2014 Direction**”), setting out IDA’s required modifications (“**Required**”);

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**Modifications 1**") to the Draft Revised ICO and requiring NetLink Trust to submit further proposed modifications ("**Further Proposed Modifications 1**") thereto;

- (v) IDA's direction to NetLink Trust dated 11 February 2015 ("**2015 Direction**"), setting out IDA's required modifications ("**Required Modifications 2**") to Schedule 12C to the ICO (Co-Location Space & Service in New Co-Location Room) as well as the Draft Amended Documents and requiring NetLink Trust to submit further proposed modifications ("**Further Proposed Modifications 2**") thereto;
- (vi) NetLink Trust's Draft Revised ICO incorporating Further Proposed Modifications 1, as submitted by NetLink Trust to IDA on 23 January 2015 ("**Revised Proposed ICO 1**"); and
- (vii) NetLink Trust's Schedule 12C to the ICO (Co-Location Space & Service in New Co-Location Room) as well as the Draft Amended Documents incorporating Further Proposed Modifications 2, as submitted by NetLink Trust to IDA on 25 February 2015 ("**Revised Proposed ICO 2**").

#### **Directed Amendments**

3. Having reviewed NetLink Trust's Revised Proposed ICO 1 and Revised Proposed ICO 2 (collectively referred to as the "**Revised Proposed ICO**"), IDA is satisfied that the majority of NetLink Trust's proposed modifications are in conformity with IDA's Required Modifications 1 and Required Modifications 2 (collectively referred to as the "**Required Modifications**") as expressed in the 2014 Direction and the 2015 Direction. However, IDA is of the view that certain aspects of NetLink Trust's Revised Proposed ICO do not give full effect to IDA's Required Modifications. In the premises, IDA deems it necessary to direct NetLink Trust to incorporate specific language to give effect to IDA's requirements.
4. Accordingly, IDA hereby directs NetLink Trust as follows:
  - (a) NetLink Trust shall modify its Revised Proposed ICO to incorporate the specific drafting language set out in the enclosed appendices comprising:
    - (i) Appendix 1: Required amendments to the Main Body;
    - (ii) Appendix 2: Required amendments to Schedule 1 Residential End-User Connection;
    - (iii) Appendix 3: Required amendments to Schedule 2 Non-Residential End-User Connection;

- (iv) Appendix 4: Required amendments to Schedule 3 NBAP Connection;
  - (v) Appendix 5: Required amendments to Schedule 4 CO to CO Connection;
  - (vi) Appendix 6: Required amendments to Schedule 5 CO to Building MDF Room Connection;
  - (vii) Appendix 7: Required amendments to Schedule 6 Building MDF Room to FTTB Node Connection;
  - (viii) Appendix 8: Required amendments to Schedule 7 FTTB Node to DP Connection;
  - (ix) Appendix 9: Required amendments to Schedule 8 Building MDF Room to Residential Premise Connection;
  - (x) Appendix 10: Required amendments to Schedule 9 Building MDF Room to Non-Residential Premise Connection;
  - (xi) Appendix 11: Required amendments to Schedule 10 CO to NBAP DP Connection;
  - (xii) Appendix 12: Required amendments to Schedule 11 NBAP DP to NBAP TP Connection;
  - (xiii) Appendix 13: Required amendments to Schedule 12 Co-Location Service;
  - (xiv) Appendix 14: Required amendments to Schedule 12A RL to RL Interconnection Service;
  - (xv) Appendix 15: Required amendments to Schedule 12B Co-Location Supplementary Cooling Service;
  - (xvi) Appendix 16: Required amendments to Schedule 12C Co-Location Space & Service in New Co-Location Room; and
  - (xvii) Appendix 17: Required amendments to Schedule 15 Charges
  - (xviii) Appendix 18: Required amendments to Schedule 18 Dictionary
- (together, the “**Required Amendments**”).

(Unless the context requires otherwise, all capitalised terms used in this Further Direction, including the Appendices, shall have the same meanings as in NetLink Trust's ICO.)

- (b) NetLink Trust shall submit to IDA the clean copy of its ICO (including the Main Body and all the Schedules) incorporating the Required Amendments **by no later than 25 June 2015**. The softcopy submission shall be in Microsoft Word format, and emailed to IDA\_ILO@ida.gov.sg. In submitting the Required Amendments to IDA, NetLink Trust shall make all necessary editorial corrections for typographical, cross referencing and pagination errors.
5. The reasons for the Required Amendments are set out in the **Appendices** to this Further Direction.
6. Unless otherwise notified by IDA, NetLink Trust's Revised Proposed ICO incorporating the Required Amendments and necessary editorial corrections (the "**Approved ICO**") is hereby approved with effect from 25 June 2015. Following such approval, NetLink Trust shall adhere to the implementation timelines as set out below.

#### **Timeline for Implementation of Approved ICO**

7. Given that the Network Company plays a crucial role in the successful implementation of the Nationwide Broadband Network ("**NBN**"), IDA considers that the Approved ICO should be implemented in a timely manner in order to meet the needs of the industry. On the other hand, IDA recognises that NetLink Trust may need time to make changes to its systems as a consequence of the Required Amendments.
8. In the premises, IDA considers that it would be reasonable to direct NetLink Trust to implement the Approved ICO in the stages set out in paragraph 9 below. In specifying the said stages, IDA has prioritised the services in the Approved ICO that are of greater urgency.
9. Accordingly, IDA directs NetLink Trust to implement the Approved ICO within the following timeframe:
  - (a) within thirty (30) days from the date of the Further Direction, NetLink Trust shall make ready the changes relating to:
    - (i) Service Level Guarantees;
    - (ii) Rejection of service requests;
    - (iii) Service Activation Period Rebates;
    - (iv) Insufficient capacity;

- (v) Unused fibre handback; and
- (vi) NetLink Trust's charges
- (vii) NetLink Trust's quota management;
- (viii) NetLink Trust's notification for scheduled interruptions; and
- (ix) "Address Not Found" cases,

as set out in the respective schedules of the Approved ICO; and

- (b) Within ninety (90) days from the date of the Further Direction, NetLink Trust shall make ready the changes relating to reclassification of premises as set out in the respective schedules of the Approved ICO.
  - (c) Once the above-mentioned system changes are ready, NLT shall make available the changes via its test/staging server(s), for Requesting Licensees and/or Retail Service Providers on the NBN to perform any B2B testing, where necessary. Following the B2B tests, unless otherwise agreed by IDA, NLT shall implement the changes by another thirty (30) days thereafter (i.e., by 60 days from the date of IDA's issuance of the Approved ICO for the list of changes in paragraph 9(a) above and by 120 days from the date of IDA's issuance of the Approved ICO for the change in paragraph 9(b) above).
10. IDA reserves the right to make public all or parts of any correspondence/submission received in response to this Further Direction. In this regard, any part of any correspondence/submission which the sender (whether NetLink Trust or another party) considers is commercially sensitive shall be clearly marked and placed in a separate annex. IDA will take the above into consideration when deciding whether to disclose the information submitted.
11. NetLink Trust is reminded of its obligation to comply with this Direction under Section 27(5) of the Act.

12. Any clarification required on this Direction shall be made in writing, addressed to our Ms Aileen Chia (Deputy Director-General (Telecoms & Post)), and emailed to IDA\_ILO@ida.gov.sg. Please note that any query or clarification from NetLink Trust shall not affect NetLink Trust's obligation to comply fully with this Direction, including, in particular, the timelines to be complied with.

Yours faithfully



Leong Keng Thai  
Deputy Chief Executive Officer / Director-General (Telecoms & Post)