

**RESPONSE BY OPENNET PTE LTD TO THE CONSULTATION PAPER ON
REVIEW OF INTERNAL WIRING FRAMEWORK ISSUED BY THE INFO-
COMMUNICATIONS DEVELOPMENT AUTHORITY OF SINGAPORE ON 15
JULY 2014**

STATEMENT OF INTEREST

- (A) In September 2008, OpenNet was appointed by the Info-communications Development Authority of Singapore (“IDA”) as the Network Company to design, build and operate the passive infrastructure of the Next Generation Nationwide Broadband Network (“NGNBN”).
- (B) OpenNet received its Facilities-Based Operator Licence from the IDA on 1 April 2009, and was designated as a Public Telecommunication Licensee (“PTL”) under Section 6 of the Telecommunication Act (Chapter 323) on the same day.
- (C) As the Network Company responsible for the design, rollout and operation of the passive infrastructure of the NGNBN, OpenNet has a keen interest in seeing that the Internal Wiring Framework (“IW Framework”) is regularly reviewed and updated to keep pace with the evolving needs of info-communications infrastructure operators and end-users.

SPECIFIC COMMENTS

1. OpenNet welcomes this opportunity to provide its views and comments on the Consultation Paper on “Review of Internal Wiring Framework”, issued by the IDA on 15 July 2014.
2. OpenNet has reviewed the Consultation Paper and hereby submits its views and comments on the same, specifically Questions 1 to 3 therein, for the IDA’s consideration.
3. In general, OpenNet supports the IDA’s proposal to restructure and revise the IW Framework by applying it to twisted-pair, coaxial, structured and optical fibre cables. OpenNet further agrees with the rationale stated in the Consultation Paper to substantiate the said proposal.
4. With regard to the IDA’s proposal to only license internal telecommunication wiring work (“IW Work”) installers who have: (a) passed the relevant courses approved by the IDA; or (b) possess the necessary certification from the PTLs, OpenNet is in favour of the proposed measure for the same reasons cited by the IDA in support of the measure. Going forward, OpenNet intends to work with the IDA on the formation of the panel to assess the training courses, and to determine whether licences can be granted based on such courses.
5. With regard to Question 3 of the Consultation Paper, OpenNet submits that it is premature to remove the requirement on developers or owners to obtain fibre readiness certification, as stipulated in the Code of Practice for Info-communication Facilities in Buildings 2013 (“COPIF 2013”).
6. OpenNet notes that the requirement on fibre readiness certification was only incorporated into the COPIF 2013 in May 2013, slightly more than a year ago. In due time there will be new residential developments, which are built in accordance with the requirements prescribed in the COPIF 2013, becoming eligible to obtain their Temporary Occupation Permit (“TOP”) as they approach the final stages of construction. Unfortunately the revised IW Framework will not be implemented in time for this group of developments. Furthermore, it is premature to do away with the

requirement for fibre readiness certification when the effectiveness of the revised IW Framework has yet to be ascertained. In consideration of these, and the sound justifications put forward by the IDA in its Consultation Paper, OpenNet agrees with the IDA that the requirement on developers or owners to obtain fibre readiness certification should be retained.

7. OpenNet appreciates this opportunity to provide its views and comments on the Consultation Paper, and would welcome a meeting with the IDA to discuss this submission.

Thank you.