

Spectrum Sharing

1. In relation to the IDA's proposed amendments on spectrum sharing, Singtel notes the IDA's email clarification dated 7 January 2015 that the proposed amendment is to update the Telecommunication (Radio-Communication) Regulations (**Regulations**) as shared use of spectrum is already implemented in practice. In addition, such requirements will only be imposed after careful consideration and assessment, to ensure that any impact to existing users, if at all, will be kept to a minimum. An example given was spectrum sharing at national day events.
2. While Singtel understands that the amendments are intended to reflect what is currently already in practice, we wish to reiterate that the IDA should continue to ensure that, in the event of spectrum sharing, it recognises key considerations including but not limited to the following:
 - a. adverse impact of shared spectrum use should be kept to none where possible;
 - b. recognise impact on the licensed user's Quality of Service (**QoS**) and to apply the relevant QoS waivers where necessary;
 - c. communication by the IDA to affected end-users in the event of impact that results from spectrum sharing through no fault of the licensed user; and
 - d. assessment and consideration of rebates of license fees, as well as payment of costs from third party users to the licensed users, for periods when the licensed users' usage of their licensed spectrums are affected.