

Mediacorp Pte Ltd

Response to

**CONSULTATION PAPER ISSUED BY
THE INFO-COMMUNICATIONS MEDIA DEVELOPMENT AUTHORITY**

**PUBLIC CONSULTATION ON THE REVIEW OF THE CODE OF PRACTICE FOR
INFO-COMMUNICATION FACILITIES IN BUILDINGS (“COPIF”)**

To:

Aileen Chia (Ms)

Director-General (Telecoms & Post)

Assistant Chief Executive (Connectivity & Competition Development)

Infocomm Media Development Authority

10 Pasir Panjang Road

#10-01 Mapletree Business City

Singapore 117438

Responded by:

Mr. Goh Kim Soon

Mediacorp Pte Ltd

1 Stars Avenue

Singapore 138507

kimsoon@mediacorp.com.sg

Table of Contents

S/No	Sections	Page
1	Summary of major points	3
2	Statement of interest	4
3	Comments	5
4	Conclusion	8

1. Summary of major points

Mediacorp welcomes the opportunity to respond to IMDA's public consultation on the review of the code of practice for info-communication facilities in buildings ("COPIF").

Mediacorp would like the COPIF to include provision for its digital TV equipment installation. The details of our comments are in Section 3.

2. Statement of interest

Mediacorp is, amongst its many other businesses, a Free-To-Air (FTA) Broadcaster, and Mediacorp is currently building and rolling out its digital TV network to enable indoor reception. This digital TV network is being built for rollout across the whole of Singapore, so that people can receive digital terrestrial television broadcast signals without reliance on any wired connections.

As the builder and owner of this digital TV network, Mediacorp is concerned with the high rental cost and the availability of space for equipment installation.

Mediacorp also foresees the need to provide coverage to new residential buildings and the co-existence of new and existing technologies.

3. Comments

Question 1: IMDA invites views and comments on:

- i. Any procedural issues (e.g. physical access or implementation matters) arising from IMDA's proposed amendments to the COPIF on the scope and use of the MDS on building rooftops to provide coverage to External Areas.

1. Mediacorp submits that the use of the mobile deployment space in buildings should be extended to include free-to-air broadcasting services such as our DTV services. We have raised this previously in our response to the 5 August 2016 Public Consultation Paper issued by MCI in respect of the review of the Telecommunications Act and related amendments to the Media Development Authority of Singapore Act, and we would like to take this opportunity to reiterate our request.
2. Mediacorp provides free-to-air digital television ("DTV") services, with in-building coverage. In providing this service, we must install equipment around the island. The DTV services are an essential component of mass communication and we take our responsibilities in this area seriously.
3. In providing the DTV services, we face many of the same challenges that MNOs face in accessing buildings and rooftops to install the necessary equipment. Unfortunately, we do not enjoy the regulatory entitlements granted to MNOs under the COPIF. We would therefore like IMDA to consider extending to Mediacorp the same, or at least substantially similar, regulatory entitlements.

Question 3: IMDA invites views and comments on:

[...]

- iv. (a) The proposed requirement for Licensees and building owners/managers to secure pre-agreed emergency access for service restoration during emergencies, particularly where the Licensee is using the space and facilities for Springboarding;
- (b) The recommendation for managed buildings to have pre-agreed emergency access to be provided with two (2) hours' notice and for unmanned buildings to have pre-agreed emergency access provided soonest possible upon notification; and
- (c) Any specific details that should be included in such pre-agreed emergency access requirements.

1. Assuming that the regulatory entitlements in the COPIF are extended to Mediacorp, we are of the view that the 2-hour notice period for managed premises is a reasonable period. We think that a minimum period should also be specified so as not to unduly delay normal maintenance, and we suggest a notice period not longer than three (3) days.
2. In addition, on occasion there is a need to supply emergency power to the equipment and/or premises during the maintenance (for example, if the urgent maintenance is required because of a power outage). Thus far we have managed to work out amicable solutions with premise owners. However, this adds additional overhead to an already urgent need. We therefore suggest that building owners allow us to supply external or alternative power sources (for example, generators) in order to speed up the maintenance process and minimize disruption in the DTV service.

Question 5: IMDA invites views and comments on:

Residential Developments

[...]

1. We welcome the Authority's decision to retain coaxial cable systems in the COPIF (paragraph 58 of the consultation). The coaxial cable system is a useful part of home infrastructure. Besides catering to StarHub TV, it can alternatively be used to distribute digital TV signals from a single source to all rooms in a household. For example, a single household can share an antenna for the DTV system and use the existing coaxial cabling to distribute the signal throughout the household, instead of having separate DVB-T2 antennas. This is also the preferred way to distribute signals to basements and bomb shelters. Such features would enhance the availability of the DTV services in such locations, where ordinarily the digital TV signals would not penetrate.

Question 6: IMDA invites views and comments on:

[...]

iv. Any other considerations (e.g. additional power requirements) or suitable specifications to be included for Space and Facilities in Road and MRT Tunnels.

1. Assuming that the regulatory entitlements in the COPIF are extended to Mediacorp, we would like to ask IMDA to consider if it would be possible to share the radiating cable infrastructure in Road and MRT tunnels amongst MNOs and Mediacorp to enable communication and dissemination of information in Road and MRT tunnels, especially in case of emergencies.

4. Conclusion

Our DTV service is a critical free public service.

High operating costs will be an obstacle to the goal of maximizing coverage. One of the most expensive operating costs involved in providing the DTV service is the rental of space for DTV broadcasting equipment. The ability to obtain free equipment space under the current COPIF gives direct coverage and commercialization advantages to MNOs, while a critical, free-to-air service provider, is not accorded these benefits.

It is important that we are accorded the same entitlements as MNOs so that we can maximize the number of households that can receive good DTV services in Singapore.