

6th June 2017

Ms Aileen Chia
Director-General (Telecoms & Post)
Assistant Chief Executive (Connectivity & Competition Development)
Infocomm Media Development Authority
10 Pasir Panjang Road
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Dear Madam,

PUBLIC CONSULTATION ON THE REVIEW OF COPIF

We refer to the Consultation Paper issued by IMDA on the “Review of The Code of Practice For Information Communication Facilities In Buildings (COPIF)” dated 26 April 2017 and the Industry Briefing on 3 May 2017.

SP Telecoms is in the process of rolling out our own infrastructure as part of our vision to build a more reliable and diverse network in Singapore. Singapore can only benefit from having more FBOs deploying their own infrastructure, delivering end-to-end services to end users. In the bigger picture of developing Singapore as a Smart Nation, it is important that any revisions in guidelines or regulations take into consideration the needs of various FBOs, especially those that are beginning to deploy their infrastructure. It is with this consideration that SP Telecom craft our responses as below.

Section 1 – Use and Scope of Mobile Deployment Space provided within a development to provide mobile coverage

SP Telecom has no further comments on this section.

Section 2 – Requirements of Space and Facilities to be provided to MNOs

SP Telecom has no further comments on this section.

Section 3 –Use of and Access to Space and Facilities by Licensees

Question 3i – Whether a set of guidelines should be included where MNOs use the rooftops, to ensure that MNOs deploy their equipment efficiently, taking into consideration the building developer’s or owner’s future needs and requirement.

SP Telecom - SP Telecom has no further comments.

Question 3ii – The proposal to continue relying on the Rules of Usage, laid down in COPIF paragraph 16.4, as a guide to resolving disputes over how house rules are to be applied when Licensees use COPIF Space and Facilities; whether these Rules should be expanded and/or new rules added and what these additional rules should encompass.

SP Telecom – COPIF Paragraph 16.4 is a useful guide for all FBOs. In reality, not all the guidelines are practiced. However, SP Telecom is more than willing to work with all parties amiably in resolving disputes. Any new rules should be added to this existing paragraph.

Question 3iii – The proposed removal of the obligation on building developers or owners to provide the necessary means for Licensees to access cable distribution systems or other Space and Facilities which are located above the Height Limit, i.e. it is recommended that Licensees will be obliged to secure their own means of access to Space and Facilities beyond the Height Limit.

SP Telecom – This is deemed reasonable as long as the Building Developers/Owners facilitate the access to the buildings for installation works, taking into consideration safety precautions are adopted by MNOs.

Question 3iv (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 spring-boarding.

SP Telecom – This is a useful guideline to ensure responses are timely during outages.

Question 3iv (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.

SP Telecom – This is a useful guideline to ensure responses are timely during outages.

Question 3iv (c) – Any specific details that should be included in such pre-agreed emergency access requirements.

SP Telecom – SP Telecom has no further comments.

Section 4 – Requirements to Enhance Network and Service Resilience

Question 4i – Whether the current requirement of 2 sets of lead-in pipes (i.e. one set in vital services buildings and essential facilities, with an additional set at a different location) is sufficient for resilience purposes.

SP Telecom – IMDA must address the situation of shortage of lead-in pipes today to both new and old buildings. Additional sets of lead-in pipes will be useful, especially where there are multiple FBOs planning to enter the buildings. Typically, at new buildings, after the TFCC takes over the MDF and allocates the lead-in amongst themselves, there is none left for other FBOs. If TFCC members are not able to spare any of the lead-in pipes to FBOs, FBOs would have to seek assistance from IMDA.

Question 4ii – Whether an additional MDF Room, telecom riser and set of cable distribution system should be provided as mandatory requirements or included as recommendations under the COPIF guidelines.

SP Telecom – For new developments, additional MDF Rooms, Telecom Risers and Cable Distribution System should be provided as mandatory requirement due to increasing needs by the FBOs. This will be much needed because of the increasing number of FBOs that are deploying their own infrastructure. As is today, the MDF Rooms are overcrowded, especially in existing buildings, and it is almost impossible for newer FBOs to set up, save for incumbents. Therefore, where possible, there should be more MDF Rooms created, especially in buildings where MDF Rooms are already fully occupied. On this subject of MDF Rooms, SP Telecom would also like to recommend that keys to access the MDF room be held by building owners so that in case of emergency, there is clear knowledge of who to approach to get access.

Question 4iii – Any other types of developments (besides those stated in this Section) that should be included in the list of vital services buildings and essentials facilities, and the reasons for doing so.

SP Telecom – MOE schools can be a consideration as some of the schools are temporarily converted into other uses (e.g. as Polling Stations during General Elections, holding areas during emergency times). Other developments could include sea ports.

Section 5 – Provision of Cables for Telecommunications (Non-Broadband Coaxial Cable) Systems in all Developments (for Non-Residential Developments)

5iv – Whether building developers or owners of new non-residential developments should be required to pre-install additional infrastructure to facilitate the provision of telecommunication services to the units, and reasons for or against doing so.

SP Telecom – In SP Telecom’s opinion, it is more effective to expand the MDS to cover MDF Room because if the MNOs do not have space to deploy their system in the MDF Room, the pre-installed infrastructure could not be utilized.

Section 6 – Developments consisting of 1 or more Road or Mass Rapid Transit System (“MRT”) Tunnels

Question 6i, Question 6ii and Question 6iii

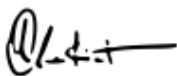
SP Telecom - SP Telecom has no further comments to these 3 questions.

Question 6iv – Any other considerations (e.g. additional power requirements) or suitable specifications to be included for Space and Facilities in Road and MRT Tunnels.

SP Telecom - As above in Section 4, IMDA should consider allocating more space at MDF Room/Equipment Room/or similar at the entrance/exit of the Road and MRT Tunnels. This will facilitate the deployment of infrastructure by FBOs to these locations as the need arise to cater to need for choice and diversity by authorities as well as MNOs.

Thank you.

Yours faithfully,



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