24 May 2017

Ms Aileen Chia
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
By email: Consultation@imda.gov.sg

Dear Ms Chia

TITLE OF SUBMISSION

Superloop (Singapore) Pte Ltd (**Superloop**) welcomes the opportunity to make a submission on the Public Consultation on the Review of the Code of Practice for Info-Communication Facilities in Buildings (**COPIF Consultation Paper**).

We request that the IMDA treat this submission as confidential.

About Superloop

Superloop is a leading independent provider of digital services in the Asia Pacific region.

The Superloop group owns and operates over 540km of fibre networks in Australia, Singapore and Hong Kong, connecting over 70 of the region's key data centres. The Superloop Singapore network is continually expanding with further diverse connections recently completed to the Singapore Exchange, IO and NTT data centres in Singapore.

The Group also operates businesses including BigAir Group, APEXNetworks, CINENET Systems and SubPartners.

For more information, visit: www.superloop.com

Introduction

Superloop notes that Sections 1 to 3 of the COPIF Consultation Paper relate to mobile deployment spaces and Superloop do not have comment on these sections. We also do not have any comment on Section 6, which deals with mobile developments in road or MRT tunnels. We set out our comment on Section 4 and Section 5 below.

Section 4 – Requirements to Enhance Network and Service Resilience

Question 4
IMDA invites views and comments on:

i. *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;*

ii. *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; and*

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

Superloop is of the view that two sets of lead-in pipes are sufficient for resilience. Some of Superloop's customers prefer their services to be fully physically separated, including separate MDFs, risers and cable paths. Ideally, all non-residential buildings would, as standard, have two separate lead-in entries, MDF rooms and risers, not only vital services buildings.

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

Question 5:

Non-residential Developments

iv. 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.

v. Where:

a) internal telecommunication wiring should be pre-installed,

- *whether fibre should be the prescribed option and if so, what requisite number of cores of optical fibre would be appropriate;*
- *where these should be terminated given that for non-residential developments, the use and the size of the units within the developments may change from time to time; and*
- *what operational issues need to be addressed, including how to manage and monitor the use of the additional facilities/infrastructure (e.g., how to ensure that Licensees remove their cables/connections to the units promptly and what processes should be put in place).*

b) internal telecommunication wiring need not be pre-installed,

- *whether the current cable distribution systems would be sufficient, or should there be additional obligations imposed on building developers or owners of non-residential developments to install other facilities e.g. air blown tubes to facilitate the installation of fibres by Licensees;*
- *if other facilities such as air blown tubes were to be pre-installed, where these should be terminated given that, for non-residential developments, the use and the size of the units within the developments may change from time to time; and*
- *what operational issues need to be addressed, including how to manage and monitor the use of any other facilities/infrastructure that may be required by additional obligations imposed on building developers or owners (e.g., how to ensure that Licensees remove their cables/connections from the air blown tubes, if air blown tubes are adopted, and what processes should be put in place).*

In Superloop's experience to date, most developers of non-residential buildings install a sufficient number of lead-in pipes left capped underground at the property boundary, were it not for the activities of larger telecoms entities. The problem is that large telecoms entities such as Singtel, Starhub and

NLT are required to have their services installed to the building immediately on completion, and those entities often take up all of the available lead-in pipes and run cables from them directly to their external manholes, leaving no space for future telecoms service providers.

To avoid the above dilemma, developers could install the lead-in pipes to a manhole within the property boundary, as close to the property line as possible. This manhole would belong to the building owner, and telecoms service providers could then connect their pipes to this manhole.

The above solution will not always be feasible (for example where there is insufficient space to install a manhole within the property boundary). In circumstances where pipes are left at the boundary, Superloop would suggest that the IMDA restrict the number of pipes that large and incumbent telecoms providers use. This would leave pipes available for other providers to use in future. Superloop would also suggest that accurate records must be kept by building managers to ensure they know where these pipes are, and how many are available for use. We recommend that, after mandatory services are installed, there should be at least 6 x 110mm PVC pipes left for other providers at each entry.

Lastly, we would raise the question of managing the removal of cables that are no longer in use, in order to make available the relevant pipes for other telecoms providers. Superloop often enter agreements with Building Managers that require Superloop to remove cables once they are no longer in use. We would suggest that the IMDA strongly encourage other providers to also remove cables that are no longer in use.

Conclusion

Superloop hopes its input to the IMDA's COPIF Consultation Paper has been of helpful. Should you have any queries in relation to this submission, please do not hesitate to contact us on the details below:

Superloop (Singapore) Pte Ltd
Attention: General Counsel
Unit #07-09, 18 Cross Street
China Square Central, Singapore 048423
Fax: +61 7 3088 7398
Email: notices@superloop.com

SUPERLOOP (SINGAPORE) PTE LTD
24 May 2017