

IDA Reference: IDA.INTC.03.0304

22 June 2011

Singapore Telecommunications Limited
31 Exeter Road
Comcentre #18-00
Singapore 239732
By Email

Attention: Mr Sean Slattery
Vice President (Regulatory & Interconnect Strategy)

Dear Sirs,

REVIEW OF SINGTEL'S REFERENCE INTERCONNECTION OFFER ("RIO")

1. Please refer to the following documents:
 - a. the Code of Practice for Competition in the Provision of Telecommunication Services 2010 ("**Code 2010**");
 - b. the Schedule of Interconnection Related Services and Mandated Wholesale Services as notified under Code 2010 ("**IRS Schedule**"); and
 - c. Public Consultation on the Second Review of Singapore Telecommunications Limited's Reference Interconnection Offer published on 21 January 2011 ("**Public Consultation**").
2. Unless defined herein, capitalised terms shall have the meanings ascribed to them in the RIO.
3. Under Sub-section 12.5.5 of Code 2010, Singapore Telecommunications Ltd ("**SingTel**") is required to submit to IDA for approval, within 30 days from the effective date of Code 2010, SingTel's proposed modifications to the existing RIO to conform to the requirements of Code 2010. While Code 2010 came into effect on 21 January 2011, in consideration of the Public Consultation seeking views on key issues to be addressed in the forthcoming RIO review, IDA had not required SingTel to submit its proposed RIO-modifications in accordance with the Sub-section 12.5.5 timeframe; instead, IDA considered it more appropriate for such RIO-modifications to be submitted after IDA has had an opportunity to review industry feedback and responses to the Public Consultation.

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4. IDA has now completed its review of the responses to the Public Consultation (please refer to the attached **Explanatory Memorandum** for details). Accordingly, IDA will now require SingTel to propose, for IDA's review, modifications to the existing RIO to conform to the requirements of Code 2010. The proposed modifications shall include the following:

Key Issues Identified in the Public Consultation

- a. Access to SingTel's Submarine Cable Landing Stations ("SCLS") / Frontier Stations (under Schedule 8D of the RIO)

SingTel must review and propose modifications to Schedule 8D of the RIO, to allow facilities-based licensees other than Indefeasible Rights of Use (IRU) holders and holders of Long Term Leased Capacity, to access and co-locate at SCLS/ Frontier Stations for the purpose of providing backhaul services to facilities-based licensees who are IRU holders or holders of Long Term Leased Capacity in SingTel's SCLS.

- b. Access to SingTel's Local Exchanges (under Schedule 8A and 8B of the RIO)

SingTel must review and propose modifications to Schedules 8A and 8B of the RIO, to allow facilities-based licensees, who wish to access and co-locate in SingTel's local exchanges, to provide local connectivity services to other licensees for the purpose of interconnection and accessing unbundled network elements and services.

In addition, SingTel must also propose modifications to Schedules 8A and 8B of the RIO to enable licensees, whose services mandated by IDA may only be accessed at SingTel's local exchanges, to offer access to other licensees to SingTel's local exchanges, for the purpose of obtaining the licensees' mandated services. Access in this regard would include access to lead-in ducts and associated manholes, necessary cabling and trunking within the local exchanges.

- c. Removal of Number Portability Service

SingTel may remove the offer of Number Portability Service (Schedule 6) from the RIO.

- d. Provision of Transit Service (currently under Schedule 2C of the RIO)

SingTel must review and propose modifications to Schedule 2C of the RIO, to offer to convey transit traffic from a Requesting Licensee to a terminating party, notwithstanding that it may not have any capacity available in the interconnection link(s) between it and the terminating

party. SingTel may however propose a reasonable recovery of additional costs it may incur for the conveyance of such transit traffic.

Other Amendments

e. Ordering and Provisioning Procedures

IDA agrees with one of the respondents to the Public Consultation, that the existing ordering and provisioning processes under the RIO, which require hard copies of forms to be transmitted via fax to SingTel, is unnecessarily restrictive in light of today's pervasive use of electronic communication means. That said, IDA is of the view that the implementation of an electronic ordering system, as suggested by the same respondent, may not be justified given the low number of transactions for RIO services. In this regard, on balance, IDA requires SingTel to amend the ordering and provisioning procedures under the RIO to allow Requesting Licensees to submit completed ordering forms via email, in addition to the existing means of using fax. The email option should also extend to other similar requests from Requesting Licensees, such as requests for network information under Schedule 3A and requests for physical access to lead-in ducts and associated manholes under Schedule 5A.

f. Main Body (Part 1- Acceptance Procedures)

Clause 1.1

IDA takes the view that there is merit in allowing a Requesting Licensee to seek clarification from SingTel, prior to submitting a Notification of Acceptance to enter into a RIO Agreement. Unless SingTel is able to justify otherwise, SingTel must review and propose modifications to the RIO to provide for a process where a Requesting Licensee may submit an expression of interest to commence discussions and to seek clarifications with SingTel on the RIO. For the avoidance of doubt, the said process is to be presented as an option to a Requesting Licensee, i.e., the Requesting Licensee may opt to submit a Notification of Acceptance should it view that it need not seek clarifications from SingTel prior to entering into a RIO Agreement.

g. Schedule 5B

Following the removal of co-location service at radio towers and tower sites from the IRS Schedule in Code 2010, SingTel may remove Schedule 5B in its entirety from its submission of the proposed modifications to the RIO.

5. For the avoidance of doubt, the above list of key modifications is not intended to be a comprehensive or exhaustive list of all the modifications that SingTel must incorporate into the RIO. To the extent that other modifications are required to be made to the RIO in order for the RIO to fully comply with the requirements of Code 2010, SingTel must propose such modifications for IDA's review. In addition, arising from the industry consultation on SingTel's proposed modifications to the RIO or where necessary, IDA may direct SingTel to incorporate further modifications.
6. In accordance with Sub-section 12.5.5 of Code 2010, SingTel must submit its proposed modifications to the RIO **within 30 days** from the date of this letter.
7. Please note that any request for IDA's clarification of the above should be made in writing to the attention of the undersigned. Unless otherwise agreed to by IDA in writing, any request for clarification shall not affect the timeframe for submission of modifications as stipulated in paragraph 6 above.

Yours faithfully,



Aileen Chia
Deputy Director General (Telecoms and Post)