

In Confidence



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Dear Ms Chia,

PUBLIC CONSULTATION ON THE SECOND REVIEW OF SINGTEL'S REFERENCE INTERCONNECTION OFFER ("RIO")

We refer to IDA's consultation document issued on 21 January 2011 in regard to the above matter. Our detailed response to the issues raised in the consultation document is set out below.

1a) Third Party Operators' Access to Co-location Space at Submarine Cable Landing Station ("SCLS")

Having carefully considered this matter, we are of the view that IDA should not allow third party operators to access SingTel's SCLS for the sole purpose of building backhaul connectivity and providing backhaul services to allow other operators to access submarine cable capacity. Rather, we believe that IDA should retain the priority for licensees who have their own submarine cable capacity and who wish to deploy their own backhaul facilities.

From our experience, we understand that co-location space at SCLS remains limited. In addition, given the rollout of Next Gen NBN and Singapore's policy goal to be become a leading info-communications hub, we expect increasing deployment of international connectivity, by way of landing new submarine cable systems in Singapore or activation of capacity in existing submarine cable systems.

Therefore, allowing these third party operators to access SCLS for the sole purpose of building backhaul connectivity and providing backhaul services could: (i) worsen the problem of limited co-location space, and (ii) impede other operators who own submarine cable capacity to co-locate and gain access to their capacity.

In addition, it is unclear from IDA's proposal what would be the recourse if (when) there are competing demands for co-location space between the third party operators and operators who own the submarine cable capacity.

We also do not see any significant administrative difficulties if the RIO continues to retain some form of priority for operators who have their own submarine cable capacity and wish to deploy their own backhaul facilities. We believe that the current practice has been working well and should continue to do so.

1b) Third Party Operators to Build Connectivity to SingTel's Local Exchanges

While we understand IDA's intention of facilitating and enhancing competition in the local connectivity market, we are of the view that there should be a limitation in co-location space in SingTel's local exchanges. We believe that IDA should still retain the priority for licensees who wish to deploy local connectivity facilities and co-locate in SingTel's local exchanges to access interconnection related and mandated services under the RIO.

2) Removal of Number Portability ("NP") Service Schedule from SingTel's RIO

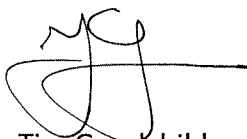
We support IDA's initiative to remove the NP Service Schedule from SingTel's RIO, given that number portability would involve a multi-party implementation. We further agree with IDA's proposal that advisory guidelines can be developed for multi-party number portability service arrangement.

3) SingTel to Procure Additional Link Capacity for Conveying Transit Traffic

We support IDA's position that SingTel should be responsible for procuring additional link capacity for the conveyance of transit traffic. It would also be reasonable that SingTel is allowed to recover the relevant costs of doing so.

We are grateful for the opportunity to provide our representations on this matter. Please do not hesitate to contact me, should anything in this letter require clarification or elaboration.

Yours sincerely,
For and on behalf of
StarHub Ltd



Tim Goodchild
Head (Government & Strategic Affairs)