

# **M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON THE REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER**

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## **M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON THE REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER**

1. We welcome the opportunity to submit our views and comments to IDA for its consideration in its review of Singapore Telecommunications Limited's ("SingTel") Reference Interconnection Offer ("RIO").
2. M1 is a leading integrated communications service provider in Singapore, providing a full range of voice and data communications services over its network. Since 1 Apr 1997, M1 has made significant inroads into the local mobile communications market, gaining considerable brand presence and market share. In August 2000, we launched our international telephone services and in April 2001, we obtained the Facilities-Based Operator ("FBO") Licence for the Provision of 3<sup>rd</sup> Generation ("3G") Mobile Communication System and Services and the 3G Spectrum Right. M1 took the lead in introducing 3G technology and launching our 3G services in February 2005. M1 was also the first to launch Singapore's first true island-wide wireless broadband service, M1 Broadband Service, in 2006. We became a full-fledged broadband player with the introduction of M1 Fixed Broadband service in 2008, transforming M1 from a single-play mobile operator to a dynamic multi-play operator, with interests in both the mobile and fixed sectors. Following the launch of ultra high-speed fixed broadband services on the Next Generation Nationwide Broadband Network ("NGNBN") in September 2010, M1 became the first operator in South East Asia to launch the Long Term Evolution ("LTE") based Next Generation Mobile Broadband Network ("NGMBN") on 21 June 2011.
3. The implementation of the RIO has been crucial in facilitating interconnection between SingTel and non-dominant licensees, reducing potential difficulties and delay in negotiations. Nevertheless, a review of the RIO taking into consideration the following is necessary for the continued success of Singapore's info-communications market:
  - (a) recent market developments; and
  - (b) remaining access issues to buildings.

### **Address Remaining Access Issues to Buildings/Premises in Schedule 5A (Licensing of Lead-in Duct and Lead-in Manholes)**

4. M1 notes that SingTel has proposed a more limited scope of licensing for the use of Building Lead-in Duct(s) and Lead-in Manhole(s). We would like to highlight that both the existing and the proposed Schedule 5A of the RIO do not cater for access to buildings/premises within a compound consisting of multiple sections of ducts and manholes leading to the buildings/premises. This includes many buildings/premises such as the Singapore Changi Airport, restricted areas or installations e.g. MINDEF camps, and university campuses where multiple buildings are located within a large compound. In order to access such buildings/premises, licensees would need access to all the associated facilities e.g. ducts and manholes etc. in all the multiple sections that could amount to several kilometers leading to the buildings/premises. Such access is important to ensure fair and efficient competition, particularly since there are constraints in granting further trenching works in such compounds e.g. aircraft runways, MINDEF compounds etc. due to national and security reasons.

5. In light of the above, we propose that the revised RIO clarifies that:

- Schedule 5A includes the access to any building/premise i.e. not restricted to specific types of buildings/premises;
- Requesting Licensee(s) using RIO to lay cable(s) into a building/premise via the Lead-in Duct(s) will be able to terminate the cable(s) within the Building MDF, and to traverse the cable(s) via the Building MDF(s) to access other parts of the building, subject to the building owner/developer and/or Governmental's approvals. We propose similar changes to incorporate the above in Schedule 3D (Licensing of Building MDF Distribution Frame);
- In the event that SingTel notify that the use of a requested Building Lead-in Duct(s) and/or Manhole(s) is not available, SingTel would:
  - (a) provide the reasons explaining the basis of this;
  - (b) indicate clearly on a map the specific pipeline segment(s) and manhole(s) that are not available;
  - (c) where available, offer alternative pipeline segment(s), Lead-in Duct(s), and Manholes(s) etc to facilitate the access.
- The boundary of Central Business District ("CBD") under Section 5.12.1 of Schedule 9 (Charges) should carry the same definition as reflected in the latest Street Directory by the Land Transport Authority ("LTA") when the request for a licence for the use of Lead-in Duct(s) is approved.