

ON/REG/0911/0111

14 September 2011

INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE (“IDA”)

10 Pasir Panjang Road

#10-01 Mapletree Business City

Singapore 117438

Via email & fax (IDA_Consultation@ida.gov.sg; (65) 6211 2116)

Attention: Ms Aileen Chia
Deputy Director-General (Telecoms & Post)

Dear Ms Chia

PUBLIC CONSULTATION ON THE SINGAPORE TELECOMMUNICATIONS LIMITED’S REFERENCE INTERCONNECTION OFFER

We refer to the consultation paper issued by IDA on 1 August 2011 with regard to Singapore Telecommunications Limited’s (“SingTel”) Reference Interconnection Offer (“RIO”).

OpenNet welcomes the opportunity to comment on the proposed revised RIO. We enclose herein our views and comments on the proposed amendments to Schedule 8A (Co-Location for Point of Interconnection) and Schedule 8B (Co-Location for Point of Access) of SingTel’s RIO.

Please do not hesitate to contact the undersigned should you require any clarification on this submission.

Yours sincerely,



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Enc.

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PUBLIC CONSULTATION ON THE SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER – RESPONSE FROM OPENNET PTE LTD

Statement of Interest

1. OpenNet welcomes this opportunity to provide its comments on the proposed revised Reference Interconnection Offer (“RIO”).
2. OpenNet was established in 2008 as a joint venture between four partners – Axia NetMedia Corporation, Singapore Telecommunications Limited (“SingTel”), Singapore Press Holdings Ltd and Singapore Power Telecommunications Pte Ltd.
3. In September 2008, OpenNet was appointed by the Infocomm Development Authority of Singapore (“IDA”) as the Network Company (“NetCo”) to design, build and operate the passive infrastructure of the Next Generation Nationwide Broadband Network.
4. OpenNet received its Facilities-Based Operator Licence from IDA on 1 April 2009, and was designated as a Public Telecommunication Licensee under Section 6 of the Telecommunication Act (Chapter 323) on the same day.
5. OpenNet’s Co-Location Space is located at nine of the SingTel Exchange Buildings. OpenNet offers its Co-Location Service (an Ancillary Mandated Service) to NetCo Qualifying Persons through its Interconnection Offer.

Comments on Schedule 8A & Schedule 8B of SingTel’s RIO

6. OpenNet provides in this section its comments on SingTel’s proposed amendments to Schedule 8A (Co-Location for Point of Interconnection) and Schedule 8B (Co-Location for Point of Access) of the RIO.

Clause 7.3 of Schedule 8A & Clause 7.3 of Schedule 8B

7. These Clauses clarify the operation and maintenance responsibilities in respect of any fibre cables that are installed between the Termination FDF and the Requested Location pursuant to Clause 7 of the respective Schedules.
8. Instead of the Mandated Licensee, OpenNet submits that IDA should consider an arrangement where SingTel assumes the responsibility of operating and maintaining the fibre cables installed between the Termination FDF and the Requested Location.
9. The Mandated Licensee has restricted access to and within the SingTel Exchange Building. The proposed arrangement set out under Clause 7.3 (of Schedules 8A and 8B)

will require the Mandated Licensee to separately seek the approval of the SingTel Exchange Building management, before it could carry out any operation and maintenance work in relation to the fibre cables. In OpenNet's view, this arrangement would prolong the response time and may inadvertently delay the restoration of services on the affected fibre cables in the event of a fault occurrence.

10. OpenNet recommends that IDA should consider an arrangement where SingTel, as the party that owns and/or controls access within the SingTel Exchange Building, undertakes the operation and maintenance work for the fibre cables installed between the Termination FDF and the Requested Location. In OpenNet's view, this arrangement will streamline the operational and maintenance support available to the Mandated Licensee and its customers.

Clause 7.4 of Schedule 8A & Clause 7.4 of Schedule 8B

11. Under Clause 7.4, SingTel may, at its reasonable discretion, move, divert or re-route any fibre cables at the Mandated Licensee's cost and expense. OpenNet submits that any movement, diversion or re-routing of the fibre cables installed pursuant to Clause 7 of the respective Schedules should require the prior written consent of the Mandated Licensee.
12. OpenNet envisages that the Mandated Licensee would have to consult its customer prior to allowing any movement, diversion or re-routing of the fibre cables. It would therefore be appropriate to allow a reasonable period of time for the Mandated Licensee to liaise with and consult its customer. OpenNet proposes that the Mandated Licensee be given a period of one month for this activity, which may include assessing the impact of the proposed action and evaluating the measures that the parties could implement to minimise or avoid any disruption to services.

Clause 7.7 in Schedule 8A

13. OpenNet does not agree that Clause 7.7 is necessary. The Mandated Licensee should not be responsible for obtaining the necessary permits and approvals to enable SingTel to install fibre cables between the Termination FDF and the Requested Location within the SingTel Exchange Building. In OpenNet's view, SingTel, as the party that owns and/or manages the SingTel Exchange Building, could undertake this responsibility in providing the fibre installation work pursuant to Clause 7 of Schedule 8A.
14. A combination of the responsibilities for fibre installation work, and for obtaining the necessary permits and approvals for such work to proceed, will avoid the need for coordination between the different parties. SingTel is well placed to undertake these responsibilities in providing a "one-stop shop" service to the Mandated Licensee, given its role as the owner and/or manager of the SingTel Exchange Building.

Ending Remarks

15. OpenNet appreciates this opportunity to respond to IDA's public consultation on the proposed revised RIO. Please let us know if IDA should require any clarification on this response.
 16. Thank you.
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