

M1 Limited



28 February 2011

Ms Aileen Chia
Deputy Director-General (Telecoms & Post)
Infocomm Development Authority of Singapore
8 Temasek Boulevard
#14-00 Suntec Tower Three
Singapore 038988
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Dear Ms Chia,

M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON THE SECOND REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER ("RIO")

1. We refer to IDA's consultation on the above dated 21 Jan 11 and provide our comments as follows:
 - a. M1 strongly supports the proposed measure to further stimulate competition in the backhaul market by de-linking the provision of backhaul services from the requirement of submarine cable ownership. There has been increasing interest in landing submarine cable capacity into Singapore and correspondingly, the demand for backhaul services. We expect this trend to continue with the landing of new submarine cables, as well as changes in the domestic connectivity market, with more new players offering local connectivity services in competition with the incumbents. M1 agrees that removing the linkage between the provision of backhaul services and submarine cable ownership would introduce a new level of competition in the backhaul market, and in turn generate greater interest from carriers in landing submarine cable capacity in Singapore. With this change, it is important that IDA also simplify/facilitate the process for access to the Submarine Cable Landing Station. As for priority processing, we believe a "first-come-first-served" approach will be fair and easy to administer, since there is no objective basis to confer special rights for owners of submarine capacity.



- b. M1 supports the removal of the Number Portability Service Schedule as this is a multi-party arrangement and processes/procedures are determined/continually reviewed by the Fixed Number Portability Working Group which comprises of the fixed line providers.
2. Please do not hesitate to contact us if you require any clarification on the attached or any further input. Thank you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Leng', positioned above a horizontal line.

Mrs Chan Sock Leng
Director
Human Resources & Corporate Development