

**AUCTION OF
700 MHz SPECTRUM RIGHTS (2016),
900 MHz SPECTRUM RIGHTS (2016),
2.3 GHz SPECTRUM RIGHTS (2016),
AND 2.5 GHz SPECTRUM RIGHTS (2016)**

**CLARIFICATIONS TO INFORMATION
MEMORANDUM AND AUCTION RULES**

14 JULY 2016

INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY
REPUBLIC OF SINGAPORE

Important Notice

This clarification document shall form an integral part of, and be read in conjunction with, the Auction Rules and Information Memorandum. Where there are any inconsistencies between this clarification document and the Auction Rules or Information Memorandum, the Auction Rules and Information Memorandum shall prevail.

S/N	Reference	Questions/ Comments	Clarifications
Information Memorandum			
1	Section (A) Footnote 1	Please provide further information on the circumstances under which a Bidder would have to shift within the 900 MHz band due to the High-Speed Rail (“HSR”) requirements, the advance notice period that will be provided to the affected Bidder, and the procedures involved in any movement (to minimise impact to customers).	<p>The MNO that has been assigned the Extended-GSM (“EGSM”) frequencies (i.e. 885 – 890 MHz paired with 930 – 935 MH) may be required to shift its assignment within the EGSM band (i.e. 880 – 890 MHz paired with 925 – 935 MHz) once the frequency allocation for the HSR is finalised. If the MNO assigned to the EGSM band is also the current spectrum right holder in the EGSM band (i.e. 882 – 887 MHz paired with 927 – 932 MHz), the MNO may continue to operate in the same frequencies until the frequencies for the HSR are finalised. IDA will provide at least 6 months advance notice should there be a requirement to shift.</p> <p>IDA has included the above information as clarification in the Information Memorandum.</p>
2	Section (A) Para 4.1 and 4.2	Apart from the 2x5 MHz of 900 MHz set-aside for 3G services, please confirm whether Winning Bidders are required to use all of the spectrum for 4G services (unless otherwise approved by IDA). Please confirm that the requirement for Winning Bidders to “augment their existing networks” applies to all of the spectrum that they win.	Any Existing MNO granted the 700 MHz Spectrum Rights (2016), 900 MHz Spectrum Rights (2016), 2.3 GHz Spectrum Rights (2016), and/or 2.5 GHz Spectrum Rights (2016) will be required to deploy 4G and/or IMT-Advanced telecommunication systems and provide 4G and/or IMT-Advanced telecommunication services using all or part of its assigned spectrum in the respective frequency band(s).

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Information Memorandum			
3	Section (A) Para 4.3	<p>1. What will be the implications for the timing of the milestone commitments if the Auction process is delayed or is longer than IDA might anticipate? Will there be an extension on the timetable for rollout?</p> <p>2. Please clarify how IDA will determine whether a New Entrant would be considered to have met its coverage obligations. For example:</p> <p>i. What is the specific percentage coverage value/ signal strength value that the New Entrant needs to comply with for nationwide outdoor service coverage?</p> <p>ii. How many buildings does the New Entrant need to cover (and to what percentage/ signal strength) in order to meet its in-building service coverage requirement?</p>	<p>1. The timeline for the nationwide rollout requirements as indicated in the Information Memorandum and in the Specific FBO Licence Requirement template are tied to the commencement of the spectrum right. Hence, should there be delay to the commencement of the spectrum right, the timeline will shift accordingly.</p> <p>2. IDA will separately inform the Winning New Entrant Bidder of the measurement criteria that IDA will use to assess whether the nationwide coverage requirement has been met. IDA will provide the Winning New Entrant Bidder with appropriate notice of the measurement criteria after the auction(s). In the meantime, the Winning New Entrant Bidder may refer to the 4G QoS standards to be imposed on MNOs providing 4G services which were announced by IDA on 1 June 2016, as well as the 3G QoS framework.</p>
4	Section (A) Para 4.5	<p>1. Please confirm that the requirement for Winning Bidders to negotiate in good faith for wholesale</p>	<p>1. While the new MNO is not considered to be a mobile virtual network operator (“MVNO”), as stated in the Decision, the new MNO is not prohibited from obtaining wholesale services from</p>

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Information Memorandum			
		<p>arrangements does not apply to negotiations with a New Entrant.</p> <p>2. Please confirm that any negotiation for wholesale arrangements apply only in relation to 4G and/or IMT-Advanced telecommunication services provided over the spectrum allocated during the upcoming auction.</p> <p>3. For emergency call services, please clarify if the following technologies are acceptable:</p> <p>a. VoLTE or OTT voice over 4G data network; or</p> <p>b. Use combined technologies in our network design such as 2G (for voice) + 4G, or 3G (for voice) + 4G.</p>	<p>the Existing MNOs during the initial rollout phase should it wish to do so, provided there is mutual agreement between the new MNO and the Existing MNO(s). In this regard, without prejudice to IDA's right to intervene and impose appropriate measures, IDA has no objection for any such negotiations between the Existing MNO(s) and the new MNO for such wholesale access to be carried out in good faith.</p> <p>2. To provide greater clarity, IDA will make it clear that the requirement to negotiate in good faith to provide wholesale telecommunication services to MVNOs, upon receiving a request for such provision, applies to the Facilities-Based Operator Licence ("FBO Licence") for the provision of 4G and/or IMT-Advanced services. Hence, the wording of the relevant provision in the Existing MNOs' FBO Licences will be amended accordingly to better and more clearly reflect this requirement. Separate from the present spectrum allocation exercise, IDA will further assess whether there is a need to extend this requirement to the provision of 3G services, depending on market and technology development.</p> <p>IDA has amended the Information Memorandum and the Specific FBO Licence Requirement template to make this clear.</p> <p>3. IDA does not prescribe any technology to provide emergency call services, but shall require the Winning Bidder to provide a publicly available mobile voice telephony service which has</p>

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Information Memorandum			
			<p>nationwide coverage, free access to emergency services at any time, and uninterrupted, seamless call handover when moving from location to location at a speed of up to 100km/h, under its FBO Licence. In the submission of the Expression of Interest Document, the Prospective New Entrant Bidder shall also indicate the technology it will be using to provide the mobile voice telephony service (if it is not intending to use 4G and/or IMT-Advanced technology to provide emergency call services).</p>
5	Section (A) Para 6	<p>1. A few enquirers requested to increase the global spectrum cap to 80 MHz (with Winning New Entrant Bidder). One argument was that it was common for an MNO to acquire 40% of the total spectrum share (including its existing spectrum holding), and IDA's proposed spectrum cap would not allow so and was not consistent with international practices. It also argued that a majority of European countries with multi-band auction did not set global spectrum caps. Where they did, global spectrum caps were usually significantly higher, i.e., $\geq 50\%$ of spectrum. Only UK had caps at below 40% of spectrum available. On the other</p>	<p>1. IDA will maintain the global spectrum cap of 75 MHz (if there is a Winning New Entrant Bidder) and 100 MHz (if there is no Winning New Entrant Bidder). As explained in the Information Memorandum, the policy objective of introducing spectrum caps is to prevent the monopolisation of scarce spectrum resources and to facilitate an outcome where operators may reasonably obtain sufficient spectrum to deliver viable mobile services. In particular, if the global spectrum cap is increased to 80 MHz (if there is a Winning New Entrant Bidder), it may result in an outcome where three operators have to contend for 95 MHz of spectrum in the General Spectrum Auction once an operator maximises the amount of spectrum it can acquire under the spectrum cap. This could result in some of the operators having insufficient spectrum to provide viable mobile broadband services, which would be contrary to IDA's policy objective.</p> <p>IDA is also of the view that structuring the 2016 Spectrum Auction such that an operator may have 40% of the total</p>

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Information Memorandum			
		<p>hand, a few enquirers requested to implement a low-band spectrum sub-cap of 2 x 25 MHz (with New Entrant) and 2 x 30 MHz (without New Entrant).</p> <p>2. An enquirer requested to give each Existing MNO First Rights of Refusal (“FROR”) to one (1) lot of the 700 MHz to meet the relevant QoS standards at reserve price.</p> <p>3. It is unclear whether the global spectrum cap of 75 MHz in the General Spectrum Auction includes the New Entrant Spectrum Lot (60 MHz).</p> <p>a. Please confirm that a New Entrant Bidder will at most get 1 lot of 700 MHz + 1 lot of 2.5 GHz or 3 lots of 2.5 GHz in the General Spectrum Auction.</p>	<p>allocated spectrum (comprising its existing spectrum holdings and the spectrum it may acquire in the 2016 Spectrum Auction) will lead to an untenable and unsustainable outcome. To elaborate, in order for an operator to achieve the foregoing, IDA will have to set the global spectrum caps for the 2016 Spectrum Auction at above 100 MHz (if there is a Winning New Entrant Bidder). In such a scenario, the remaining operators will have to contend with less than 65 MHz of spectrum should one of the operators maximise the spectrum it can acquire under the said global spectrum cap. However, this is likely to adversely affect the ability of the remaining operators to obtain a reasonable amount of spectrum to provide viable mobile services, contrary to IDA’s policy objective of introducing spectrum caps.</p> <p>IDA notes that in jurisdiction where there are four (4) operators, such as France, Hong Kong, the Netherlands, Spain and the UK, the operator with the largest spectrum holding may hold between 29.2% and 36.1% of the total allocated spectrum for mobile services in those countries. With a global spectrum cap of 75 MHz (if there is a Winning New Entrant Bidder), the maximum spectrum holding an operator can obtain is 34.4% (including the operator’s existing spectrum holding and the maximum spectrum it may acquire in the 2016 Spectrum Auction), which is in line with the above-mentioned international examples. Additionally, in countries where there are three (3) operators, such as Austria, Germany, Ireland, Portugal, South Korea and Switzerland, the operator with the largest spectrum holding may hold between 36.5% and 49.4% of the total allocated spectrum for mobile services. With a</p>

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Information Memorandum			
			<p>global spectrum cap of 100 MHz (if there is no Winning New Entrant Bidder), the maximum spectrum holding an operator can obtain is 38.4% (including the operator's existing spectrum holding and the maximum spectrum it may acquire in the 2016 Spectrum Auction), which is also in line with the international examples.</p> <p>IDA will also not tighten the spectrum caps with the introduction of a sub-1 GHz spectrum cap as such a cap of 2 x 25 MHz (if there is a Winning New Entrant Bidder) will result in an operator who wishes to acquire two (2) 900 MHz lots to be restricted to a maximum of three (3) 700 MHz lots. Given that there is no carrier aggregation between the 700 MHz and 900 MHz bands commercially available and in the spectrum roadmap at the present juncture (which the industry acknowledges in their comments to IDA during the earlier public consultations), it would not be reasonable to design the auction in such a manner that administratively treats a combination of one (1) 900 MHz lot and three (3) 700 MHz lots as an effective substitute to a technically optimal four (4) lots of 700 MHz, and to require an operator to decide between the two spectrum portfolios. This is unlike the TDD bands which the industry has provided feedback that high frequency bands carrier aggregation combinations are commercially available. Hence, IDA will not further tighten the spectrum caps with the introduction of a sub-1 GHz spectrum cap, and will leave it to the operators to decide their network and technology needs and bid based on their commercial and operational considerations.</p>

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Information Memorandum			
			<p>There are many ways in which regulators impose spectrum caps in an auction. While there are regulators who do not set global spectrum caps in an auction, IDA understands that band-specific caps would be imposed. There are also other regulators, such as those in Austria, Norway, and the UK, who may set spectrum caps with the operators' existing spectrum holding in mind. This means an operator with more existing spectrum holding may not be able to acquire as much spectrum in the auction as compared to another operator with less existing spectrum holding. For the 2016 Spectrum Auction, IDA is of the view that setting a global spectrum cap with the proposed band-specific spectrum caps, as opposed to setting additional/further band-specific spectrum caps (in lieu of a global spectrum cap) or spectrum caps that are based on an operator's existing spectrum holding, would provide operators with more flexibility to determine their spectrum holding that best suits their needs. Using the spectrum caps for the 2016 Spectrum Auction as an example, an operator can choose to maximise its spectrum holding allowed under the global spectrum cap in the TDD bands. Further, IDA's global spectrum cap of 75 MHz (if there is a Winning New Entrant Bidder) and 100 MHz (if there is no Winning New Entrant Bidder) would already allow an operator to acquire more than 40% of the spectrum to be allocated in the General Spectrum Auction, which is in line with international examples seen in Ireland's 2012 auction (up to 35.7% of the spectrum to be allocated in the auction if the operator does not have existing spectrum holding), and Norway's 2013 auction (up to 45% of the spectrum to be allocated in the auction if the operator does not have existing spectrum holding).</p>

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Information Memorandum			
			<p>On balance, having given full consideration to the submissions by the industry players and possible spectrum releases in the future, IDA maintains that the proposed spectrum caps (band-specific and global caps) are reasonable. The caps will provide operators with a reasonable amount of spectrum should any operator acquire the maximum amount of spectrum allowed under the global spectrum cap. Such an approach would better meet IDA's policy objective of preventing the monopolisation of scarce spectrum resources while facilitating an outcome where operators may reasonably obtain sufficient spectrum to provide viable mobile services. Operators will also have sufficient flexibility to acquire the amount of spectrum that best meets their operational requirements.</p> <ol style="list-style-type: none"> <li data-bbox="1106 826 2029 1193">2. IDA will not be granting each Existing MNO one (1) lot of the 700 MHz at reserve price. IDA would reiterate that it is generally not inclined towards granting FROR in spectrum allocation exercises, as it strengthens incumbency and distorts the market mechanism which ensures that scarce spectrum resources are allocated to parties that are best able to utilise them efficiently. It is for any MNO (particularly the incumbent ones) to put in place the necessary resources to secure the spectrum that it deems appropriate to meet its regulatory obligations and compete effectively in the market. <li data-bbox="1106 1235 2029 1377">3. IDA confirms that the global spectrum cap of 75 MHz includes the New Entrant Spectrum Lot, i.e., a Winning New Entrant Bidder can bid up to 15 MHz (1 lot of 700 MHz + 1 lot of 2.5 GHz, or 3 lots of 2.5 GHz) in the General Spectrum Auction.

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Information Memorandum			
6	Section (A) Footnote 3	Would a shareholder indirectly holding 12% or more voting shares in an intermediate or ultimate holding company of the Applicant be considered an Associate of the Applicant simply as a result of its 12% indirect holding?	Whether directly or indirectly, as long as (without limitation) a shareholder is in a position to control not less than 12% of the Voting Power, the shareholder is considered an associate, with the exception of the scenario where an ultimate parent company only has a passive ownership interest in two persons. In such a scenario, the ultimate parent company and both persons will not be considered to be Associates of one another.
7	Section (A) Para 7.2	Please clarify if the starting price for the New Entrant Spectrum Lot includes Goods and Services Tax (" GST ").	It is before any applicable GST. GST will be separately charged. IDA has amended Section (A) paragraph 7.2 in the Information Memorandum to clarify this.
8	Section (A) Para 13.2	What are the applicable FBO Licence fees in amending an existing FBO license to provide 4G/3G/2G services?	IDA clarifies that there are no fees involved in amending an FBO licence.
9	Section (A) Para 18.1	Please advise how Existing MNOs could have access to the information on the areas where the operation of the 700 MHz band will be restricted prior to the conduct of the General Spectrum Auction.	IDA will provide further details about these sites to the Winning New Entrant Bidder and the Existing MNOs prior to the General Spectrum Auction.
10	Section (C) Para 2.7	1. Please clarify whether a Bidder who has not included at least one (1) 700 MHz Spectrum Lot and/or one (1) 900 MHz Spectrum Lot, other than the FROR Lot, respectively in its Initial Offer can/is (or is not) entitled to switch a lot bid from any Category	1. Bid submission via the Auction System is a three-step process: i. Bid entry: A Bidder enters its Bid for the current Round on the bid form. The bid form contains a drop-down menu for each Category for the Bidder to select how much spectrum it wishes to bid for at the current Standing Price. The drop-down menu contains the various options that a Bidder can

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Information Memorandum			
		<p>to the 700 MHz Category and/or to the 900MHz Category. If the Bidder is not entitled to switch the lot bid, please confirm if any attempts to do so would result in an invalid Bid. Please clarify whether the Auction System will:</p> <ul style="list-style-type: none"> i. prevent a Bidder from placing a request to Switch Amount into the Category; and/or ii. show an error message(s) in the event a Bidder attempts to place an invalid Bid <p>2. Please confirm whether there is a requirement to include at least one (1) 2.3 GHz Spectrum Lot (if there is no Winning New Entrant Bidder) and/or one (1) 2.5 GHz Spectrum Lot in the Initial Offer Document in order to switch into these bands.</p>	<p>bid for in a Category. For a Bidder who did not include a 700 MHz lot or two (2) 900 MHz lots in its Initial Offer, the drop-down menu for these Categories will only contain zero (0) as an option. As the Bidder will not be able to switch into the 700 MHz and/or the 900 MHz Categories by the design of the Auction System, an invalid Bid scenario in which the Bidder attempts to do so will not arise.</p> <ul style="list-style-type: none"> ii. Bid submission: Once a Bidder has entered its Bid for the current Round on the Bid Form, it submits the Bid Form to the Auction System for checking. The Auction System will produce error messages to alert the Bidder in the event that a Bidder attempts to place an invalid Bid. The Auction System will not allow a Bidder to confirm an invalid Bid. The Bidder will have to amend its Bid accordingly on the bid form and submit it for checking again. iii. Bid confirmation: If the submitted Bid is valid, the Auction System will allow the Bidder to confirm it. Only a confirmed Bid is considered as “placed and valid” by the Auction System. <p>2. IDA confirms that there is no requirement to include at least one (1) 2.3 GHz Spectrum Lot (if there is no Winning New Entrant Bidder) and/or one (1) 2.5 GHz Spectrum Lot in the Initial Offer Document in order to switch into these bands.</p>
11	Section (C) Para 2.12	1. Please confirm that the Bidder will be allowed to withdraw any winning bid for 5 MHz of Time-Division Duplex	IDA confirms that only a Bidder who wins a single 2.3 GHz and/or a single 2.5 GHz Spectrum Lot at the end of the Quantity Stage of the General Spectrum Auction but has never submitted a Bid for

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		<p>(“TDD”) spectrum (in either or both 2.3 GHz and 2.5 GHz Categories) as long as that bidder does not make any active bid for just 5 MHz of TDD spectrum e.g. the Bidder wanted to switch its demand out of the TDD band, but had some portion of their demand retained or denied; or the Bidder sought to reduce its demand in the TDD band, but had a portion of its Exit Bid selected as a winning bid.</p> <p>2. Should the Bidder withdraw its Winning Bid for the single TDD Lot, please advise on the subsequent treatment of the Lot.</p> <p>3. There was a suggestion to conduct a subsequent bidding session to allow interested Bidders a second chance to win the withdrawn single TDD lot prior to the Assignment Stage.</p>	<p>a single 2.3 GHz and/or a single 2.5 GHz Spectrum Lot in its Initial Offer or at the Standing Price in any Round of the Quantity Stage (including the scenarios as described by the enquirer) may provide notice to the IDA that it wishes to withdraw its Winning Bid for this Lot.</p> <p>For the avoidance of doubt, if the Bidder had in its Initial Offer or at the Standing Price in any Round of the Quantity Stage submitted a Bid for any of the following:</p> <ul style="list-style-type: none"> i. a single 2.3 GHz Spectrum Lot; ii. a single 2.5 GHz Spectrum Lot; or iii. a single 2.3 GHz Spectrum Lot and a single 2.5 GHz Spectrum Lot; <p>the Bidder will not be able to withdraw its Winning Bid in the event that it wins a single 2.3 GHz and/or a single 2.5 GHz Spectrum Lot.</p> <p>Sections 16.4 and 16.6 of the Auction Rules have been amended to provide greater clarity on the situations under which a Bidder is not permitted to withdraw demand in the 2.3 GHz and/or 2.5 GHz bands.</p> <p>IDA reserves the right to determine whether to subsequently reallocate the single TDD lot, and will notify Bidders separately on how it would be done, taking into consideration the outcome of the</p>

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Information Memorandum			
			General Spectrum Auction. IDA has inserted paragraph 2.13 to Section (C) of the Information Memorandum to clarify this point.
12	Section (C) Para 2.17 and 2.18	Will IDA only accept assignments in which lot 1 in the 900 MHz band is assigned to a bidder that wins a single lot in the 900 MHz Category? Will it consider assignments that include lot 1 as an FROR lot for existing MNOs? Will IDA allow assignments in which the FROR lot of an existing MNO is not contiguous with the remaining 900 MHz lots won by that MNO? Will the New Entrant be sure that it will not get lot 1?	Winning Bidders may not submit a proposal whereby spectrum lots to be assigned to any Winning Bidder are non-contiguous (i.e., the lots, including the FROR lot, should be contiguous). As there is the possibility that the Winning Bidder assigned the EGSM frequencies may need to shift due to the HSR, where one or more Bidders win a single lot in the 900 MHz Category, IDA will only accept assignments in which “lot 1”, i.e., 885 MHz – 890 MHz paired with 930 MHz – 935 MHz, in the 900 MHz is assigned to such a Bidder.
13	Section (E)	<ol style="list-style-type: none"> 1. Please provide the indicative amount of lead time between publication of the final Information Memorandum and Auction Rules and the submission of the Expression of Interest Document. 2. Could IDA confirm the minimum lead-time that will be given in between the conclusion of the New Entrant Spectrum Auction and the start of the General Spectrum Auction. 	<ol style="list-style-type: none"> 1. Prospective New Entrant Bidders are required to submit the Expression of Interest document by 1 September 2016. IDA has updated Section (E) of the Information Memorandum and published the deadline for the submission on IDA’s website. 2. The deadline for the submission of the Initial Offer Document will, at the earliest, be 4 weeks after the conclusion of the New Entrant Spectrum Auction. In the event that there is no New Entrant Spectrum Auction, IDA will provide at least 1 month’s notice prior to the revised submission deadline for the Initial Offer Document.

S/N	Reference	Questions/ Comments	Clarifications
Specific FBO Licence Requirement			
14	Condition 1.2(a)	<ol style="list-style-type: none"> 1. Please confirm that the New Entrant will be required to provide nationwide Short Message Services (“SMS”). 2. Please confirm that the obligation for the New Entrant to provide mobile voice and SMS services cannot be fulfilled using wholesale services from another MNO. 	<p>IDA confirms that the new MNO will be required to provide nationwide voice and SMS services. As stated in IDA’s Decision, IDA will adopt a technology neutral approach and will leave it to the new MNO to decide on the best approach to provide such services (i.e., by LTE, any other technologies or via wholesale arrangements) to meet this requirement.</p>

S/N	Reference	Questions/ Comments	Clarifications
Auction Rules			
15	Section 2.2.5	<ol style="list-style-type: none"> 1. Please confirm that a change to network design, suppliers, products, plans or other similar matters would not be “material information” for the purposes of Section 2.2.5 of the Auction Rules and similar provisions. 2. Please advise on how the process of communication will work in practice with regard to notifying IDA of any changes to the ownership structure of the Applicant and obtaining the prior written approval of IDA to any changes in accordance with Section 2.2.5 of the Auction Rules 	<ol style="list-style-type: none"> 1. Any such changes would be material information and the New Entrant Bidder must get IDA’s prior written approval before such changes may be made. In the event of any doubt on the part of the New Entrant Bidder as to whether any information or changes are material, it shall err on the side of caution and notify IDA for IDA’s assessment. Hence, in the submission of the Expression of Interest Document, Prospective New Entrant Bidders shall inform IDA of any potential investors, suppliers, etc, to the greatest extent possible. 2. Prospective New Entrant Bidders shall immediately and, in any case, no later than 24 hours from becoming aware of any change in the ownership and/or control structure of the Bidder (direct or indirect) or of any shareholder of the Bidder, or any other material information submitted in the Expression of

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Auction Rules			
			<p>Interest Document, Initial Offer Document or any documents attached thereto, or any document submitted in response to a request for clarification from IDA, notify IDA of such change in writing and such notification must be delivered by hand or sent as a PDF document by electronic mail. IDA will thereafter assess whether any such change is permissible.</p>
16	Sections 2.4.1 and 9.4.1(c)	<ol style="list-style-type: none"> 1. Please increase the number of Authorised Representatives to ten (10). 2. Please clarify on the criteria in determining whether an individual can be accepted as an Authorised Representative. Please confirm that either of the following will suffice as documentary evidence of appointment of Authorised Representatives: <ol style="list-style-type: none"> i. a letter from a representative of the Applicant/ Bidder confirming the appointment of the Authorised Representatives; or ii. a letter from the CEO of the applicant/ bidder confirming the appointment of the Authorised Representatives. 	<ol style="list-style-type: none"> 1. IDA will allow Prospective Bidders to register up to 8 Authorised Representatives to be physically present and participate in the auction(s), and up to 10 natural persons (including the Authorised Representatives) may attend the relevant Information Session and the Training Session. IDA has adjusted the Auction Rules. 2. IDA will require Prospective Bidders to submit the Authorised Representatives' particulars in accordance with paragraph 1.17 of the Expression of Interest Document for the New Entrant Spectrum Auction or paragraph 1.13 of the Initial Offer Document for the General Spectrum Auction. Only Authorised Representatives of a Bidder who have attended the Information Session and the Training Session, and have submitted the written declaration stating that they understand and undertake to observe the Auction Rules as well as any further details on bidding procedures, are permitted to represent the Bidders in the auction(s).

S/N	Reference	Questions/ Comments	Clarifications
Auction Rules			
17	Section 2.7.4	When does the New Entrant Bidder need to submit the further Bank Guarantee?	A New Entrant Bidder shall not be permitted to submit any Bid in the New Entrant Spectrum Auction that exceeds the aggregate value of all Bank Guarantee(s) submitted by the New Entrant Bidder to IDA and which are held by IDA at the time the Bid is submitted. As such, New Entrant Bidders are required to submit further Bank Guarantees to cover any Bid it wishes to make beyond the Reserve Price of S\$35,000,000 at least one (1) Business Day before the start of the New Entrant Spectrum Auction in order to participate in the bidding. For subsequent Rounds, New Entrant Bidders may submit the Bank Guarantees during the New Entrant Spectrum Auction, but in any case prior to the submission of any Bids that would otherwise not be matched by the aggregate value of all Bank Guarantees submitted by the New Entrant Bidder in question. In this regard, please note that IDA will not pause or suspend the auction(s) to provide New Entrant Bidders with more time to submit further Bank Guarantees. New Entrant Bidders shall be fully responsible for ensuring that their Bank Guarantees are obtained and submitted in a timely manner to avoid disappointment as Bids which are not matched by the aggregate value of their Bank Guarantees are deemed invalid. The same applies for the Winning New Entrant Bidder participating in the General Spectrum Auction.
18	Sections 3 and 10	1. Please conduct the Information Session at an earlier date, to allow auction participants more time to review and familiarise themselves with the bidding procedures (including how the bidding software works) prior to the start of the	1. The Information Sessions and Training Sessions for the New Entrant Spectrum Auction and General Spectrum Auction will be scheduled after IDA has registered the New Entrant Bidders and Bidders respectively, and before the conduct of the auctions. The intent of the Information Session and Training Session is for Bidders to familiarise themselves with the procedures of the auctions. IDA notes the request from

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Auction Rules			
		<p>General Spectrum Auction. Please allow Bidders to test the auction software as soon as practicable, to allow familiarity with the system and ensure that it is free of any software error.</p> <p>2. Propose that training sessions should be “private” to individual bidding companies, as well as to allow running of the various scenarios with multiple internal teams.</p>	<p>interested participants and will schedule them as early as possible. IDA reserves the right to determine whether to conduct more than one Information Session and Training Session if necessary.</p> <p>2. IDA will allow up to 10 natural persons (including Authorised Representatives) to attend the Information Session and Training Session. IDA will also determine the format of the Information Session and Training Session after registering the New Entrant Bidders and Bidders.</p>
19	Sections 4.1 and 12.1	Please provide more information on the potential location of the bid room.	<p>IDA will notify all New Entrant Bidders and Bidders of the location(s) where the respective New Entrant Spectrum Auction and General Spectrum Auction will be conducted.</p> <p>Section 12.1 of the Auction Rules has been amended to clarify this.</p>
20	Sections 6.1.3 and 14.1.2	A few enquirers requested increase the minimum time period to between 15 and 60 min per round.	IDA will increase the minimum time period to fifteen (15) minutes for each Round. In the event IDA decides to increase the minimum time period for each Round, IDA will provide advance notice of 24 hours to all the Bidders, in accordance with Section 23.1 of the Auction Rules. IDA has adjusted the Auction Rules.
21	Section 7.1	Is there a maximum number of rounds of bidding when the auction result is still	There is no maximum cap on the number of Rounds.

S/N	Reference	Questions/ Comments	Clarifications
Auction Rules			
		inconclusive, and IDA decides to postpone or stop the auction process?	
22	Section 7.5	With a maximum bid ceiling price for the Best Offer Bids, there is a real possibility that the remaining bidders may both bid the same Valid Bid during the Best Offer Rounds. Should this be the case, at the end of the 3 rounds, we believe that IDA should treat this amount as the "new" Round price. Should both bidders refuse to participate in the new Round, then IDA would be justified in adopting a random approach based on their last Valid Bid prices.	Best Offer Bids must be less than the Round Price of the final non-Best Offer Round in the New Entrant Spectrum Auction (i.e. the maximum Bid ceiling price). By removing the maximum bid ceiling, it goes against the principles of the Auction Rules, as the New Entrant Bidder that had been willing to pay the final Round Price should have placed a Valid Bid to accept the Round Price instead of submitting an Exit Bid. IDA has also incorporated mechanisms to resolve any tie in Best Offer Rounds by requiring the Valid Bids to be a multiple of S\$100, allowing up to 3 Best Offer Rounds, before using random selection as a last resort to resolve a tie.
23	Section 7.9	<ol style="list-style-type: none"> 1. Please confirm that if the Winning New Entrant Bidder pays the New Entrant Spectrum Lot Fee in accordance with the Provisional Award Notice, IDA will return the bank guarantee? 2. Upon winning the New Entrant Spectrum Auction, will the Bank Guarantees be drawn down for payment or can the winning spectrum price be paid directly or in any other form? 	<p>To clarify, the Winning New Entrant Bidder must pay the New Entrant Spectrum Lot Fee, as well as the other associated fees (including any Forfeiture Amounts) as set out in Section 19.3 of the Auction Rules (which will be specified in the Provisional Award Notice), before IDA returns the Bank Guarantee to the Winning New Entrant Bidder.</p> <p>The Winning New Entrant Bidder shall be required to make payment for the total amount due in the Provisional Award Notice within fifteen (15) Business Days from the date of the Provisional Award Notice by transferring such amount to the IDA Bank Account (details of which will be made known to the New Winning New Entrant Bidder). However, IDA reserves the right (but shall</p>

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			be under no obligation) to call on the Bank Guarantees for payment of any amount due. Upon payment of all amounts due to IDA, IDA will thereafter return the Bank Guarantees (to the extent not called upon) to the Winning New Entrant Bidder.
24	Section 7.10	Please shorten the time for IDA to return the Bank Guarantee in the event the New Entrant Bidder is unsuccessful.	<p>IDA will maintain the 30 Business Days from close of the New Entrant Spectrum Auction in order to ensure that all procedural matters are settled before returning the Bank Guarantees.</p> <p>IDA has amended Section 7.10 of the Auction Rules to read “For each New Entrant Bidder that is not the Winning New Entrant Bidder and is not subject to any Forfeitures, IDA will return the Bank Guarantee to the relevant New Entrant Bidder which placed that Bank Guarantee within thirty (30) Business Days from close of the New Entrant Spectrum Auction, or such other time as IDA may notify the relevant New Entrant Bidder.”</p>
25	Section 9.2.17	Please confirm if IDA will be informing all Bidders of the number of participants in the General Spectrum Auction.	Yes, IDA will be informing all Bidders of the number of participants in the General Spectrum Auction.
26	Section 14.1.7	<p>Propose that:</p> <ul style="list-style-type: none"> i. the maximum price Increment to be reduced to 5% of the last Standing Price instead of 10%; ii. the price Increment in the first few rounds of the General Spectrum Auction to be kept at 	While IDA has noted the suggestion, IDA maintains that the Increment for each Category with Excess Demand shall not exceed 10% of the Standing Price for that Category in the immediately preceding completed Round. This is the maximum Increment, but the actual Increment during the auction may be lower than 10% of the Standing Price for that Category in the immediately preceding completed Round. This is also the practice which IDA has adopted for past auctions. IDA reserves the sole and absolute discretion to determine the appropriate Increment in

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		the minimum level to give bidders time to familiarise with the bidding system.	<p>accordance with the relevant provisions in the Auction Rules. Furthermore, Authorised Representatives, who are required to attend the Information Session and Training Session, would already have an opportunity to familiarise themselves with the Auction System during these sessions.</p> <p>IDA has amended Section 14.1.7 to “Subject to Section 14.1.6, after a Round is completed, IDA will determine the Increment separately for each Category for which Excess Demand is more than zero (0). The Increment for each Category with Excess Demand shall be an amount in whole S\$10,000 units and shall not exceed 10% of the Standing Price for that Category in the immediately preceding completed Round.” to align the Increment with the New Entrant Spectrum Auction.</p>
27	Section 14.3	<ol style="list-style-type: none"> 1. Please confirm that if a Bidder drops demand for any Category to zero, this does not foreclose the Bidder from switching demand back to that Category. 2. Please confirm that Bidders are able to switch freely between FDD and TDD bands and there is no penalties involved. 	<p>Yes, a Bidder will be able to increase its demand in a Category even if it has previously dropped its demand in that Category to zero (0) provided it is a Valid Bid (e.g. it has sufficient Eligibility; it does not violate the spectrum caps). In addition, in the case of the switching into the 700 MHz and 900 MHz Categories, the Bidder is also required to have included at least one (1) 700 MHz lot and one (1) 900 MHz lot other than the FROR Lot respectively in its Initial Offer. There will be no penalties involved in such switches.</p>
28	Section 14.3.1	Please confirm if a bidder is allowed to request a reduction up to the size of its current position for a Category regardless of the quantity of Excess	A Bidder can submit a Bid that requests a reduction in the number of lots in a Category to any number including zero (0) if Excess Demand was positive in this Category in the previous Round.

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		Demand for the Category, provided that the quantity of Excess Demand is positive.	For the avoidance of doubt, such a request does not preclude IDA from assigning Standing High Bids in that Category to that Bidder and partially or fully denying its requested switch, if the relevant conditions in the Auction Rules are met.
29	Section 14.3.3	Please confirm that if reductions take place across multiple Categories, the Bidder is only required to submit an Exit Bid for one Category.	<p>A Bidder that places a Bid for which the sum of the Switch Amounts and the Reduction Amounts across all Categories is negative must place corresponding Exit Bid(s) that satisfy the following (without limitation):</p> <ul style="list-style-type: none"> <li data-bbox="1128 644 2031 762">i. the total MHz associated with the Spectrum Lots in all Exit Bids must be equal to the absolute value of the sum of the Switch Amounts and Reduction Amounts; and <li data-bbox="1128 836 2031 954">ii. the MHz associated with a particular Category in the Exit Bid cannot exceed the absolute value of the Reduction Amount for that Category. <p>In the event that a Bidder submits Reduction Amounts across two or more Categories, it is up to the Bidder to decide whether to submit an Exit Bid for only one Category, or Exit Bids for multiple Categories, as long as it satisfies the requirements for the making of an Exit Bid.</p> <p>Section 14.3.3 of the Auction Rules has been amended to clarify the above points.</p>

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30	Section 14.3.5	Please clarify that in the case where a bidder places a request to switch one paired lot from the Paired Section to one unpaired lot from the Unpaired Section and this Bidder must submit an Exit Bid for 5 MHz of the paired spectrum without an Exit Price, whether such a mandatory Exit Bid would be placed automatically as a default Bid in the Auction System or whether a Bidder has to actively place an Exit Bid. In the latter case, what is the consequence, if a Bidder does not actively place an Exit Bid?	<p>In this scenario, the Bidder must submit an Exit Bid for 5 MHz of the paired spectrum without an Exit Price. The Auction System will add this Exit Bid without an Exit Price automatically to the Bidder's Bid. It will alert the Bidder of this and to the fact that this will lead to a reduction in Eligibility.</p> <p>Section 14.3.5 of the Auction Rules has been amended for further clarity.</p>
31	Section 14.4	<p>1. Please provide further examples of requests to switch from a Category and submit Exit Bids in relation to the determination of Standing High Bidder of the different classes as defined in section 14.4, and in relation to Lots of Free Eligibility also as defined in section 14.4. Please provide a summary of all cases of when a Bidder can receive Free Eligibility.</p> <p>2. When IDA attempts to assign the accepted amounts to maximise the number of lots allocated (or to</p>	<p>1. IDA has included a further set of examples to explain Standing High Bids in the set of Worked Examples in the Auction Rules (see Annex 2). As listed in Section 14.4.5 of the Auction Rules, a Bidder receives Free Eligibility after the completion of a Round when:</p> <ul style="list-style-type: none"> i. Standing High Bids at the Prior Standing Price (which were not Exit Bids) held by the Bidder are released. The Free Eligibility received is equal to the MHz associated with the Standing High Bids that were released. ii. Split Standing High Bids at the Prior Standing Price held by the Bidder are released. The Free Eligibility received is

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		<p>minimise Free Eligibility), will the assignment be considered as an individual Bidder level or across all Bidders who have switches that are not completely accepted?</p> <p>3. Please confirm that violation of paired spectrum cap is not allowed in which case, switch priority will be overruled.</p> <p>4. Please explain why a Bidder's Eligibility will be reduced when the Bidder did not use the Free Eligibility in the next Round.</p> <p>5. Is retained Exit Bids part of the next Round's Eligibility?</p>	<p>equal to 5 MHz for each Split Standing High Bid at the Prior Standing Price.</p> <p>iii. The Bidder's request to switch from at least one Category in the Unpaired Section into at least one Category in the Paired Section is partially denied and the MHz associated with the Standing High Bid at the Prior Standing Price for a single Category in the Unpaired Section ends in 5 MHz. The Free Eligibility received is equal to 5 MHz if IDA cannot allocate the entirety of the accepted amounts pursuant to Section 14.3.4 of the Auction Rules.</p> <p>iv. In the event of no Winning New Entrant Bidder, in the General Spectrum Auction, the Bidder's request to switch from at least one Category in the Paired Section into at least one Category in the Unpaired Section may be partially or completely denied to avoid violating the maximum number of Spectrum Lots that a Bidder can bid in the Unpaired Section due to the TDD bands sub-cap pursuant to Section 1.2 of the Auction Rules. The Free Eligibility received is equal to the MHz associated with the Spectrum Lots for which the switch is denied.</p> <p>2. Free Eligibility will be minimised at the individual Bidder level and not across all Bidders.</p> <p>3. IDA would like to clarify that unlike the spectrum cap that applies across both the 2.3 GHz and 2.5 GHz Categories (if there is no Winning New Entrant Bidder) arising from the TDD bands sub-cap, there are instead band-specific spectrum caps</p>

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			<p>on the 700 MHz and 900 MHz Categories. As such, a scenario in which switch priority is being overruled due to violation of the former band sub-cap will not arise for the 700 MHz and 900 MHz Categories. Please note that Bidders are not allowed to exceed the various spectrum caps in their Bids (or it will not be a Valid Bid).</p> <p>4. It is standard practice in Clock Auctions to require Bidders to use their Free Eligibility in the first available Round or lose it. Allowing Bidders to carry unused Free Eligibility over to a further Round would undermine the price discovery process for other Bidders. A Bidder could “hide its demand” by carrying over Free Eligibility and only bid on lots much later in the auction, reducing the usefulness of the clock rounds as a mechanism to promote price discovery.</p> <p>5. As stated in Section 14.2.4 of the Auction Rules, a Bidder’s Eligibility in Round 3 and any subsequent Round is the Bidder’s Eligibility in the last completed Round less the MHz associated with the Spectrum Lots and lots of Free Eligibility for which the Bidder has placed an Exit Bid (with or without an Exit Price) in the last completed Round. Hence, retained Exit Bids do not form part of the Bidder’s Eligibility in the next Round.</p>
32	Section 14.4.2	Please elaborate further on the criteria IDA will use to decide whether Bidder’s request to switch from a Category or to place Exit Bids are denied.	A Bidder’s request to switch from a Category or to place Exit Bids may be wholly or partially denied if Excess Demand in a Category is zero (0) for that Round, and Excess Demand in that Category was strictly positive in the previous Round (except where it is the end of Round 1 and there is no previous Round). IDA will then designate Standing High Bids for that Category. For the avoidance

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			<p>of doubt, if Excess Demand in a Category is zero (0) after all Bids have been placed in Round 1, a request to switch from a Category or to place Exit Bids may be wholly or partially denied and IDA will designate Standing High Bids for that Category. In particular, such switch bids and Exit Bids will be ranked and retained based on Bidders' willingness to pay for a quantity of spectrum in order to efficiently allocate the spectrum band to the bidders who will value the spectrum band the most. As such, Standing High Bids are designated in strict priority of descending price for the Category, in the order as prescribed in Section 14.4.2 of the Auction Rules. For example, IDA will designate Standing High Bids at an Exit Price (i.e. denying the Exit Bid) before designating Standing High Bids at the Prior Standing Price (i.e. denying requests to switch from a Category) (if applicable).</p> <p>Section 14.4.2 has been amended to provide more clarity.</p>
33	Section 14.4.2(c)	<p>In a scenario where two Bidders submit switch requests in the same Category, e.g. Bidder A for two (2) lots and Bidder B for five (5) lots, and only two (2) lots in total are allowed to be switched out, please confirm that IDA will employ a random selection to determine whether Bidder A or B gets to switch out demand (instead of according priority to Bidder A simply because its request could be met completely). Please also clarify the methodology for "random selection".</p>	<p>To clarify, in selecting which Bidder's request to partially or wholly deny, the Bids will be ranked and retained based on Bidders' willingness to pay for a quantity of spectrum in order to efficiently allocate the spectrum band to the Bidders who will value the spectrum band the most. As such, Bids will be retained in strict priority of descending price for the Category as described in Section 14.4.2. For example, IDA will deny the Exit Bid (to designate Standing High Bids at an Exit Price) before denying requests to switch from a Category (to designate Standing High Bids at the Prior Standing Price) (if applicable).</p> <p>In selecting which Bidder's request to switch from a Category to deny (i.e. where 2 or more Bidders value the spectrum at the Prior</p>

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			<p>Standing Price), the Auction System will select at random, Bidder by Bidder, meaning that each such Bidder will have the same probability of being selected.</p> <p>Using the enquirer's example whereby IDA needs to designate five (5) lots of Standing High Bids at the Prior Standing Price in a Category, and only Bidder A and Bidder B have requested to switch out of the Category by two (2) and five (5) lots respectively, if the Auction System randomly chooses Bidder A first, IDA will designate Bidder A's two (2) lots as Standing High Bids. IDA will then need to further designate three (3) of Bidder B's five (5) lots as Standing High Bids. In this scenario, Bidder A's request to switch out is completely denied and Bidder B's request to switch out is partially denied.</p> <p>Alternatively, if the Auction System randomly chooses Bidder B first, IDA will designate Bidder B's five (5) lots as Standing High Bids. Since this fills all available lots in this Category, IDA will not need to further designate Standing High Bids. In this scenario, Bidder B's request to switch out is completely denied while Bidder A's request to switch out is fulfilled.</p>
34	Section 14.4.2(d)	Please provide further clarification of the conditions under which there will be a "Split Standing High Bid at the Prior Standing Price". Is it only possible if multiple bidders try to switch 5 MHz to unpaired and the Auction System has to randomly decide which bidder gets the Split Standing High Bid?	Yes, one or more Split Standing High Bids at the Prior Standing Price can only occur if at least two Bidders switch 5 MHz from the same paired Category to an unpaired Category at the same time. If only a single Bidder switches 5 MHz from a paired to an unpaired Category in a Round, its Bid can never become a Split Standing High Bid at the Prior Standing Price. This is because there must have been Excess Demand at the prior Standing Price of at least one lot in the previous Round for the Bidder to be allowed to switch

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			<p>out one lot in the paired Category to an unpaired Category. As Standing High Bids are designated in strict priority of descending price for the Category, IDA would only designate Split Standing High Bids at the Prior Standing Price after it has designated the other Standing High Bids. If there is no Excess Demand, any attempt to switch will be retained and will not be successful.</p>
35	Section 14.4.3	<p>Please clarify the following:</p> <ul style="list-style-type: none"> <li data-bbox="555 608 1095 900">i. Can a Bidder with designated Standing High Bids at the Prior Standing Price in a Category choose to increase the price associated with such lots to the current Standing Price or maintain the price at the Prior Standing Price? <li data-bbox="555 938 1095 1230">ii. If a Bidder decides to increase the price associated with such lots to the current Standing Price, when is the price increase executed (i.e., is it considered part of the previous round or can a Bidder only do this in the next Bid Round)? <li data-bbox="555 1268 1095 1378">iii. Please provide an example of how Bidders can maintain the Auction System prices at the 	<p>A Bidder with Standing High Bids at the Prior Standing Price can either hold these Standing High Bids at the Prior Standing Price or alternatively increase these Bids to the current Standing Price if it increases the number of lots bid for at the Standing Price in this Category (see Section 14.4.3 of the Auction Rules). This means, if the Bidder decides to switch additional lot(s) into the Category at the Standing Price, its Standing High Bids at the Prior Standing Price are increased to the Standing Price automatically at the same time. If the Bidder holds these Standing High Bids at the Prior Standing Price and new additional Bids are received in a further Round from other Bidders such that these Bids replace the first-mentioned Bidder's Standing High Bids at the Prior Standing Price, the first-mentioned Bidder receives Free Eligibility after the completion of a Round when the Standing High Bids at the Prior Standing Price held by the first-mentioned Bidder are released. The Free Eligibility received by the first-mentioned Bidder is equal to the MHz associated with the Standing High Bids that were released (see Section 14.4.5 of the Auction Rules).</p> <p>If the Bidder holds these Standing High Bids at the Prior Standing Price, no new additional Bids are received in a further Round, and the auction closes, the Closing Price of the Category will be the Prior Standing Price. All Bidders holding Standing High Bids,</p>

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		<p>level of Prior Standing Prices and how Bidders can increase the price associated with such lots to the current Standing Price?</p> <p>iv. Please confirm that in a case where a Bidder increases the price associated with lots designated Standing High Bids at the Prior Standing Price, then the prices of that Bidder (and other Bidders) at the Standing Price of the current Round is not increased (unless further bids are place in this Category resulting in excess demand)?</p>	<p>regardless of whether their winning Bids are at the Standing Price, an Exit Price or at the Prior Standing Price, will pay the Closing Price for each lot that they win in that Category.</p> <p>As mentioned above, a Bidder can only increase the price of its Standing High Bids at the Prior Standing Price if it switches additional lot(s) into the Category at the Standing Price. If the Bidder chooses to do so, all of its Standing High Bids at the Prior Standing Price are raised to the Standing Price automatically. If this does not lead to Excess Demand at the Standing Price, the Bidder's Standing High Bids would be designated as Standing High Bids at the Standing Price at the end of that Round. In this case, the Standing Price would not be increased in the next Round. If no further Bids are received, the Bidder would win these Standing High Bids. The Closing Price would be the lowest Price associated with any Standing High Bid held in this Category. This could either be:</p> <ul style="list-style-type: none"> (i) the Prior Standing Price if another Bidder holds a Standing High Bid at the Prior Standing Price; (ii) the lowest Exit Price if one or more Bidders hold a Standing High Bid at an Exit Price; or (iii) the current Standing Price in case all winning Bidders hold Bids at the current Standing Price.
36	Section 14.4.6	Please provide a definition of the term "first available Round".	This refers to the first Round in which the Free Eligibility received by a Bidder can be used to place Bids.

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			<p>In other words, Bidders may not carry over unused Free Eligibility from one Round to the next.</p> <p>Section 14.4.6 has been amended to provide greater clarity that the receipt of Free Eligibility by a Bidder does not increase or otherwise restore that Bidder's total Eligibility which may have been reduced.</p>
37	Section 14.6	Please confirm that in the event where excess demand in all Categories are zero but one or more Bidders have been assigned Free Eligibility, Bidders will be informed that there is still Free Eligibility in play and that the auction has not ended.	IDA will not disclose information on Free Eligibility of each Bidder to other Bidders, or information on total Free Eligibility to all Bidders. IDA will disclose each Bidder's Free Eligibility to the respective Bidder and will inform Bidders that a new round of auction will continue.
38	Section 14.6.1(a)	Please consider providing full aggregate demand information in the auction.	IDA notes the feedback from the industry and will provide discrete aggregate demand information, instead of a range. IDA has amended Section 14.6.1(a) accordingly.
39	Section 14.6.3	Please consider indicating the number of lots that each Bidder has submitted at the end of each completed Round.	IDA will maintain that no Bidder will receive information specifically regarding another Bidder during the Quantity Stage as it may encourage anti-competitive conduct.
40	17.2	How will IDA prevent the situation of the Winning New Entrant Bidder refusing to agree to a submission at Phase 1 of the Assignment Stage so as to simply drive	Only Categories for which the assignment of Spectrum Lots is contended will proceed to Phase 2 of the Assignment Stage. IDA assesses that it is unlikely for a Winning New Entrant Bidder to refuse to agree to a submission at Phase 1 of the Assignment

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		up prices paid by other Winning Bidders for the Assignment Stage?	Stage so as to simply drive up prices as this would also drive up the prices it is required to pay.
41	Section 17.2.7	<p>1. Please clarify the circumstances in which IDA will reject the Form for Agreement or Non Agreement of Spectrum Assignment.</p> <p>2. What would happen if the Winning Bidders submit the form stating that they do not agree to the assignment of lots in Phase 1 and IDA rejects the submitted form?</p>	<p>As an example, IDA may reject the Form for Agreement or Non Agreement of Spectrum Assignment if the placement of any Spectrum Lots under the proposal is not contiguous for each Winning Bidder (unless it has obtained just 1 lot in that Category).</p> <p>If the Winning Bidders submit a Form for Agreement or Non-Agreement of Spectrum Assignment indicating that there is no agreement on any assignment, IDA will proceed to Phase 2 of the Assignment Stage for all spectrum lots in the Category.</p>
42	Section 17.3	Please confirm that should the Assignment Stage of the General Spectrum Auction proceed to Phase 2, a Valid Assignment Bid by the Winning New Entrant Bidder must also be similarly covered by a Bank Guarantee of a Guaranteed Amount that is no less than the Valid Assignment Bid amount in the sealed-bid auction.	The Winning New Entrant Bidder is not required to submit further Bank Guarantees to cover its Assignment Bids.
43	Part VI	<p>We recommend the following:</p> <p>i. Each Bidder makes a declaration of the compliance to Part VI (Prohibited Activities)</p>	i,ii, iii. IDA has revised Section 1.10 of the Expression of Interest Document and Section 1.7 of the Initial Offer Document to require each New Entrant Bidder and Bidder to undertake and confirm that the Bidder, its associates who exercise significant influence over it and key responsible persons

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		<ul style="list-style-type: none"> <li data-bbox="544 276 1084 419">ii. Each Key Persons makes a personal declaration of compliance to Part VI (Prohibited Activities) <li data-bbox="544 459 1084 603">iii. That the declaration of compliance includes activities beyond Singapore in line with the Prevention of Corruption Act <li data-bbox="544 643 1084 930">iv. To impose on existing MNOs that to provide confirmation from their top 5 vendors to declare that the vendors have not been subject to influence by the existing MNOs in contradiction with the principles of the Prohibited Activities. <li data-bbox="544 970 1084 1153">v. Disallow external communication or restrict it to fixed line recorded communications provided by IDA 	<p data-bbox="1207 276 2033 339">have and will comply with the Auction Rules, including but not limited to Part VI of the Auction Rules.</p> <p data-bbox="1171 387 2033 1305">iv. If a New Entrant Bidder or Bidder engages in any prohibited activities referred to in Section 21 or 22 of the Auction Rules, IDA may serve a Forfeiture Notice on the New Entrant Bidder or Bidder (as the case may be) and/or exclude such person from the auction. This shall be without prejudice to IDA's rights to exercise any and all of its powers to take enforcement action, including the cancellation/suspension of spectrum rights and/or the imposition of financial penalties, against a New Entrant Bidder or Bidder (as the case may be) if such person contravenes any of its regulatory obligations owed to IDA. Without limitation, Section 22.1 of the Auction Rules requires that no Bidder shall enter into any arrangement with any person, such as an equipment provider or a software supplier, which places or may place any restriction on the quantities of equipment or software or other goods or services which the person supplies or offers to supply to another Bidder or on the price or any other term or condition upon which such equipment or software or other goods or services is supplied or offered to be supplied to any other Bidder. For the avoidance of doubt, the laws of Singapore shall apply in relation to the New Entrant Spectrum Auction and the General Spectrum Auction. Where applicable, such laws include the Prevention of Corruption Act.</p>

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			v. IDA will allow external communications by the Authorised Representatives to the Bidder's headquarters. Nevertheless, Bidders are reminded to fully comply with Part VI of the Auction Rules.
44	Definition of Associated Bidder	Please confirm whether criterion (i) of the definition of Associated Bidder precludes A from providing wholesale services to B (e.g. the provision of mobile airtime, leased line, shared infrastructure, IDD, and etc.)	Criterion (i) is in relation to voting power, shares, etc.; not wholesale services.

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Expression of Interest Document			
45	Section 1.7	Please advise on the form of "documentary evidence" of the vendor(s) intent to support the Applicant is acceptable? Specifically, will IDA accept a form and legally binding letter of intent based on a Request For Proposal ("RFP") as sufficient documentary evidence of vendor's commitment?	IDA will assess and determine, on a case-by-case basis, and taking into account the substance and contents of the letter of intent, whether there is sufficient documentary evidence as to the vendor's commitment to support the Applicant. In particular, such letter of intent must contain firm, certain and unqualified (save for the Applicant being pre-qualified by IDA to participate in the New Entrant Spectrum Auction, obtaining the spectrum rights and obtaining the relevant licence(s) from IDA) commitments by the vendor. Additionally, the vendor(s) also needs to submit details as to its/their relevant past experience(s), including its/their track record.
46	Section 1.8	1. Please confirm that the New Entrant is required to provide detailed information on how the New Entrant	Please refer to Section 1.8 of the Expression of Interest Document.

S/N	Reference	Questions/ Comments	Clarifications
	Expression of Interest Document	<p>will fund the entirety of its rollout obligation milestones (through to 30 Sept 2021).</p> <p>2. How would IDA verify if the promised capital investments are realistic and in-line with international norms taking into account Singapore's high building density and relevant QoS standards.</p> <p>3. Please clarify that Vendor(s) letter(s) of commitment with Term Sheet attached can be acceptable documentary evidence of the Applicant's capacity to fund system rollout and operation? Is there any further guidance regarding the definition, form or required content of documentary evidence of capacity to fund? Is there any further guidance regarding the definition, form or required content of the Letter of Financier(s) Commitments?</p>	<p>IDA will assess each Applicant's proposal on a case-by-case basis, taking into account all relevant facts, representations and submissions including but not limited to the Applicant's business or financial plan, technical team, rollout strategy, etc. Each Applicant shall be solely responsible for ensuring that it is able to meet IDA's regulatory obligations and complete its network rollout successfully so as to be able to provide the requisite mobile services. IDA's decision to pre-qualify an Applicant and/or to register a New Entrant Bidder for participation in the New Entrant Spectrum Auction shall in no way be construed as an endorsement or approval of such person's business or financial plans or other plans or strategies.</p> <p>IDA will review the content of any such letter(s) of commitment and Term Sheet to determine whether these would suffice as documentary evidence of the Applicant's capacity to fund system rollout and operation. In particular, such letter(s) of commitment to fund the Applicant must contain firm, certain and unqualified (save for the Applicant being pre-qualified by IDA to participate in the New Entrant Spectrum Auction, obtaining the spectrum rights and obtaining the relevant licence(s) from IDA) commitments by the financier.</p>
47	Section 1.9	What is IDA's intent for not permitting someone who is also on another applicant's Disclosure list to be on its Disclosure list? In essence, does this mean that a Prospective New Entrant	IDA's intent is to ensure that there are no conflicts of interest in relation to the disclosure of Confidential Information. Applicants are required to undertake and confirm that they have put in place all appropriate arrangements and agreements (such as non-disclosure agreements and China walls) with all persons in their

S/N	Reference	Questions/ Comments	Clarifications
Expression of Interest Document			
		Bidder cannot list its equipment vendor since it may also be advising another applicant?	<p>Disclosure Lists (including their equipment vendors) to ensure that all Confidential Information will not be shared with any other potential Applicants or third parties that may result in conflict of interest situations or a breach of any of the Auction Rules, including but not limited to Part VI.</p> <p>Section 1.9 of the Expression of Interest Document and Section 1.6 of the Initial Offer Document have been amended to clarify this.</p>

S/N	Reference	Questions/ Comments	Clarifications
Initial Offer Document			
48	Section 1.4	Please exempt existing MNOs from having to submit their proposed 4G and/or IMT-Advanced system, technology and services.	As there is allocation of spectrum in totally new spectrum bands, IDA will require Applicants (including Existing MNOs) to provide information about how the spectrum will be put to use. IDA does not require Applicants to submit information about its existing 4G system, technology and services unless they are relevant to putting the newly acquired spectrum into use. IDA has revised Section 1.4 of the Initial Offer Document to clarify this.
49	Section 1.5	<ol style="list-style-type: none"> 1. Please provide the definition of the term "Letter of Commitment(s)". 2. Please provide notes to Section 1.5 of the document. 3. Please highlight the difference between the "Letter of Commitment(s)" and a Bank Guarantee. 	The Letter of Commitment is a letter that evidences the commitment that a bank will submit the Bank Guarantee covering minimally the value of the Bid in the Initial Offer once IDA pre-qualifies the Applicant. An Applicant may also submit a Bank Guarantee together with the Initial Offer Document, in lieu of a Letter of Commitment. This will similarly apply to a Prospective New Entrant Bidder when submitting the Expression of Interest Document.

S/N	Reference	Questions/ Comments	Clarifications
Initial Offer Document			
			Please note that reference to “See Note 1.5” in the Initial Offer Document has been removed as there is no accompanying note for this Section.

S/N	Reference	Questions/ Comments	Clarifications
New Entrant Spectrum Auction Bank Guarantee			
50	Clause 6.4	Please clarify that the Bank Guarantee must be available potentially up to 31st October 2017, i.e., four months after the extension period.	Yes, IDA shall have the right to extend the Guarantee Validity Period to 30 June 2017, and shall have the right to serve a payment demand under the Bank Guarantee up to 31 October 2017.
51	Overall	Can the \$35mil Bank Guarantee based on the reserved price of the New Entrant spectrum lot be provided in multiple Bank Guarantee and possibly from different banks? For example, you receive two BGs (both in your prescribed form), one in the amount of \$19m and the other in the amount of \$16m.	Yes, Bidders may submit multiple Bank Guarantees from different banks as long as they comply fully with all the requirements in the Auction Rules in relation to the Bank Guarantees (e.g. issued by a financial institution that is licensed by the Monetary Authority of Singapore to provide the full scope of services falling within the definition of banking business in the Banking Act (Cap. 19)).

S/N	Reference	Questions/ Comments	Clarifications
General Spectrum Auction Bank Guarantee			
52	Clause 6.4	Proposed amendment as follows (underlined): <i>This Guarantee shall remain valid until 31 March 2017 (Guarantee Validity</i>	Clause 6.4 has been corrected to read as “This Guarantee shall remain valid until 31 March 2017 (Guarantee Validity Period). IDA shall have the right to extend the Guarantee Validity Period to a period no later than six (6) months from <u>31 March 2017</u> . Any demand by IDA under this Guarantee, if any, must be received by

S/N	Reference	Questions/ Comments	Clarifications
General Spectrum Auction Bank Guarantee			
		<i>Period). IDA shall have the right to extend the Guarantee Validity Period to a period no later than six (6) months from 31 December 2016. Any demand by IDA under this Guarantee, if any, must be received by the Bank on or before the date falling four (4) months after the Guarantee Validity Period which shall include the period of any extension <u>of the Guarantee Validity Period</u> by IDA.</i>	<p>the Bank on or before the date falling four (4) months after the Guarantee Validity Period which shall include the period of any extension by IDA.”</p> <p>Similar to S/N 50 on Clause 6.4 of the New Entrant Spectrum Auction Bank Guarantee, IDA shall have the right to extend the Guarantee Validity Period to 30 September 2017, and shall have the right to serve a payment demand under the Bank Guarantee up to 31 January 2017. In view of this, the addition of the phrase “of the Guarantee Validity Period” is superfluous.</p>

S/N	Reference	Questions/ Comments	Clarifications
Deferred Payment Bank Guarantee			
53	Clause 6.4	<p>Proposed amendment as follows (underlined):</p> <p><i>i. “This Guarantee shall remain valid until the expiry of a thirty (30) – Business Day period commencing on the Deferred Payment Date (Guarantee Validity Period). Any demand by IDA under this Guarantee, if any, must be received by the Bank on or before the date falling four (4) months after the Guarantee Validity Period <u>which shall</u></i></p>	<p>Clause 6.4 has been amended to read as “This Guarantee shall remain valid until the expiry of a thirty (30) – Business Day period commencing on the Deferred Payment Date (Guarantee Validity Period). <u>IDA shall have the right to extend the Guarantee Validity Period.</u> Any demand by IDA under this Guarantee, if any, must be received by the Bank on or before the date falling four (4) months after the Guarantee Validity Period which shall include the period of any extension by IDA.”</p> <p>The intent of the amendment is to cater for the possibility of any delay in the commencement of the 700 MHz Spectrum Right (2016), to ensure that IDA is in no worse off a position, i.e. unless the Bidder makes full payment for the 700 MHz Spectrum Right (2016) by the original Deferred Payment Date, the Bank Guarantee’s Guarantee Validity Period can be validly and</p>

S/N	Reference	Questions/ Comments	Clarifications
Deferred Payment Bank Guarantee			
		<p>include the period of any extension by IDA.”; or</p> <p>ii. <i>This Guarantee shall remain valid until the expiry of a thirty (30) – Business Day period commencing on the Deferred Payment Date (Guarantee Validity Period). <u>IDA shall have the right to extend the Guarantee Validity Period to a period of not more than [twelve (12) months]. Any demand by IDA under this Guarantee, if any, must be received by the Bank on or before the date falling four (4) months after the Guarantee Validity Period which shall include the period of any extension of the Guarantee Validity Period by IDA.</u></i></p>	<p>unilaterally extended by IDA for such periods as to fully cater for any such delay.</p> <p>In the event the commencement of the 700 MHz Spectrum Right (2016) is delayed, IDA reiterates that Bidders shall ensure that IDA is in no worse off a position. Depending on the circumstances (e.g. the period of delay), IDA will provide notification to Bidders of what is to be done. To illustrate, Bidders might be required to make payment for the 700 MHz Spectrum Rights (2016) as per the original Deferred Payment Date or submit a new Bank Guarantee with a later Deferred Payment Date to IDA that fully caters for any such delay.</p>

S/N	Reference	Questions/ Comments	Clarifications
Fit and Proper Person Criteria			
54	Application of Fit and Proper Person Criteria	Please advise who and what entities shall fall under the fit and proper person criteria.	Please refer to Schedule 2 of the Expression of Interest Document, which states that the relevant person, its associates and key responsible persons shall be subject to the fit and proper person criteria. More details may also be found in Annex 13 of the Auction Rules.

S/N	Questions/ Comments	Clarifications
Others		
55	<ol style="list-style-type: none"> 1. Please confirm that the New Entrant is required to comply with QoS standards and when the QoS obligations will apply. We also propose that the New Entrant should be required to comply with the existing 3G QoS requirement for its voice services. 2. Please confirm that the 4G QoS, network and service resilience and consumer protection measures would be implemented on a New Entrant remains the same as stated in IDA's 18 Feb 2016 decision paper, and that the 4G QoS will be imposed on the New Entrant at the same time and in the same manner as the existing MNOs. 	<p>Yes, please refer to paragraphs 67 and 78 of the Decision. IDA will adopt a phased approach in implementing the regulatory requirements. Please refer to the 4G QoS standards to be imposed on the MNOs providing 4G services which were announced by IDA on 1 June 2016. IDA will separately inform the Winning New Entrant Bidder of the QoS requirement for voice services. For the obligation to comply with the Resiliency Code, it will be effected after the new MNO achieves a 5% market share in the mobile market.</p>
56	<ol style="list-style-type: none"> 1. Is the performance bond still required for the New Entrant Bidder? 2. Please confirm how the requirement for the New Entrant Bidder to provide a performance bond of 5% or \$20 mil (whichever is higher) will be imposed on the successful bidder. 	<p>Yes, the new MNO will still be subject to the performance bond requirements. As mentioned in paragraph 50 of the IDA's Decision, IDA will impose the performance bond on the new MNO upon the grant of its FBO licence or amendments to its existing FBO licence. Thereafter, the new MNO will be required to submit the performance bond in the form of a Bank Guarantee. The Bank Guarantee shall follow the Bank Guarantee template stipulated in the FBO Licence guidelines.</p>

S/N	Questions/ Comments	Clarifications
Others		
57	Please clarify how IDA will impose on the Winning Bidders of the 900 MHz band the requirement to extend all necessary cooperation, flexibility and assistance to ensure orderly migration of services.	Existing MNOs are required to take steps to ensure the continuity of their mobile services prior to the expiry of the Public Cellular Mobile Telecommunication Service (“PCMTS”) Spectrum Rights. To ensure that they can fulfil this obligation in a timely manner, Existing MNOs shall be required to provide migration plans for the spectrum in the 900 MHz band supporting existing 3G services to IDA on how they can meet the deadline of 31 March 2017 within 20 Business Days after the close of the Assignment Stage of the General Spectrum Auction. If the Existing MNOs fail to do so, IDA reserves the right to take appropriate regulatory action.
58	<p>1. Please confirm whether IDA would allow the Winning Bidder to further defer the 700 MHz Deferred Payment Date to no later than 6 months before the actual start date of the 700 MHz Spectrum Right. Please confirm the process for extending the Deferred Payment Date.</p> <p>2. Please clarify how and when IDA intends to determine whether the grant of the 700 MHz Spectrum Right is to be pushed back beyond 1 January 2018.</p>	<p>Please refer to IDA’s clarification at S/N 53 on Clause 6.4 of the Deferred Payment Bank Guarantee above. In the event of a delay in the commencement of the 700 MHz Spectrum Right (2016), depending on the circumstances (e.g. the period of delay), IDA will provide notification to Bidders of what is to be done. To illustrate, Bidders might be required to make payment for the 700 MHz Spectrum Rights (2016) as per the original Deferred Payment Date or submit a new Bank Guarantee with a later Deferred Payment Date to IDA that fully caters for any such delay.</p> <p>Section (C) paragraph 3.3 of the Information Memorandum has been amended to include this clarification.</p>
59	Would a Winner Bidder be allowed to use the 700 MHz band earlier than IDA’s release date, at its own risk? If so, what would be the rules for usage, and what fees would apply?	IDA will not allow the use of the 700 MHz band as long as analogue broadcasting is in operation to minimise any interference to other authorised networks. However, IDA is prepared to consider trials/tests on a case-by-case basis.

S/N	Questions/ Comments	Clarifications
Others		
60	Please advise on how IDA will ensure that the EGSM band will be fully free from interference from 1 April 2017 onwards?	As stated in paragraph 11 of the Decision, IDA has noted developments in Indonesia in respect of the migration of the Indonesian MNOs' networks to GSM, High Speed Packet Access or LTE-Based technologies which point to the availability of the EGSM band before 1 April 2017. Nevertheless, IDA will continue to monitor the progress of and any further developments in relation to the migration.
61	How is the security and confidentiality of the Bank Guarantee to be assured?	The Bank Guarantees submitted to IDA will be kept by IDA and will not be disclosed to other Bidders.
62	Please clarify how IDA will prevent frivolous bidding by the Winning New Entrant Bidder.	To minimise the risk of frivolous bidding by Prospective New Entrant Bidders, IDA has put in place various measures such as assessing the financial soundness of Prospective New Entrant Bidders, e.g., requiring New Entrant Bidders to ensure that their Bids are covered by a Bank Guarantee in order for the Bids to be considered Valid Bids, and requiring a Bidder to include at least one (1) 700 MHz Spectrum Lot in its Initial Offer in the General Spectrum Auction for it to be entitled to switch a Spectrum Lot from the 2.5 GHz Category into the 700 MHz Category.
63	<p>1. Please provide more information on whether all the Authorised Representatives must be present at the 2016 Auction site, and whether all Bidders' Authorised Representatives need to be in the same room during the entire duration of the Auction.</p> <p>2. Will IDA permit Authorised Representatives and/or other staff of the Bidder to also participate through</p>	There is no need for all of the Authorised Representatives to be present during the conduct of the auctions, New Entrant Bidders and Bidders are allowed to decide on the number of Authorised Representatives to be present (subject to the maximum number permitted as stated in Sections 2.4.1 and 9.4.1 of the Auction Rules). However, the auction will be conducted onsite in IDA-designated premises, meaning that only Authorised Representatives who are onsite will be able to submit Bids. Bidders will need to inform IDA, one (1) Business Day before, of the Authorised Representatives who will be onsite participating in the auction for the next day. These Authorised Representatives will need to be in the allocated room for the entire duration of the auction for that day. More information will be provided during the Information Session.

S/N	Questions/ Comments	Clarifications
Others		
	<p>an alternate location, except that only Authorised Representatives may act on behalf of the Bidder for the purpose of the Auction?</p> <p>3. Will external communication be allowed?</p>	<p>IDA will allow external communications by the Authorised Representatives to the Bidder's headquarters. Nevertheless, Bidders are reminded to comply with Part VI of the Auction Rules.</p>
64	<p>Please provide the following information while Bids are placed in the Auction System:</p> <ul style="list-style-type: none"> i. for each Category – the total price for all bids the Bidder placed and the total price for all Exit Bids placed by the Bidder in each Category; ii. the amount of Switch Amount and Reduction Amount per Category and the sum of Switch Amounts and Reduction Amounts across all categories; and iii. the total Eligibility of the Bidder based on the placed Bids. 	<p>The Auction System will provide detailed information about a Bidder's bids.</p> <ul style="list-style-type: none"> i. The Auction System will provide detailed information on the Standing High Bids held by the Bidder. Please note that the total price for all Bids will not be provided explicitly. ii. and iii. The Auction System will provide these pieces of information.

S/N	Questions/ Comments	Clarifications
Others		
65	Please confirm that the Auction System will inform Bidders the reason(s) for why their switch attempts were rejected.	The Auction System will inform Bidders of their Standing High Bids as well as the Prior Standing Price and the Price at which the Exit Bid is retained. The reason for why switches are denied is that it would lead to Demand dropping below zero (0), i.e. unsold lots. As stated in Section 14.6.3 of the Auction Rules, IDA will not provide information specifically regarding another Bidder during the Quantity Stage.
66	Please confirm that the Auction System will point out the errors made by the Bidders when submitting their bids.	See comments to S/N 10.
67	Please confirm that Winning Bidders wanting to lease the use of their spectrum would be subject to IDA's prior approval, and that the New Entrant will not be allowed to lease spectrum to an existing MNO in exchange for wholesale access to the existing MNO's network	Any spectrum sharing arrangement (including but not limited to leasing of spectrum) is subject to IDA's prior written approval. Additionally, the Winning New Entrant Bidder shall not use the radio frequency spectrum as allocated to it by the grant of spectrum rights to provide any wholesale telecommunication service to any Existing MNOs, unless it has obtained prior written approval from IDA.
68	<ol style="list-style-type: none"> 1. Please provide more information on the contingency/ backup mechanism(s) should a Bidder encounter technical issues submitting a bid via the assigned bidding account. For example, will the IDA provide a backup account? 2. Please clarify the procedures in case of technical issues with the bidding 	There will only be one account per Bidder in the Auction System. If a Bidder has technical issues, it should contact IDA's personnel immediately. If warranted, IDA may pause the auction to fix any technical issues a Bidder may have. In case of widespread technical issues, IDA may also pause the auction. For the avoidance of doubt, when IDA pauses the auction, it will not use Bidders' Recesses or Extensions.

S/N	Questions/ Comments	Clarifications
Others		
	account and/or access to the Auction System. In particular, please confirm that Bidders do not have to use their Recess and Extensions in case of technical issues with the Auction System.	
69	Will bid upload files be accepted by the Auction System and whether the Round results be available as a download file. If so, what is the file format?	Bidders do not need to upload files to submit bids. For the General Spectrum Auction, Bidders may download their own completed Rounds results for their own reference, which will be in .xls and/or .csv format. A printer will be made available in each Bidder's room.

S/N	Reference	Key Amendments
Information Memorandum		
70	Section A paragraph 4.5	Inserted "at any time" after "...free access to emergency services"
71	Section A paragraph 6	IDA included further elaboration on the reasons for setting spectrum caps.
72	Section A paragraph 7.1	Corrected to read "IDA is prepared to grant 900 MHz Spectrum Rights (2016) and 2.3 GHz Spectrum Rights (2016) in respect of two (2) 900 MHz Spectrum Lots and eight (8) 2.3 GHz Spectrum Lots".
73	Section B paragraph 1.5	1. Insertion of paragraph 1.5(c) "whether, in the opinion of IDA, the Prospective New Entrant Bidder has the relevant personnel, sufficient resources and/or adequate commitment to Singapore, including the composition of the board and management team and the shareholding, to be able to fulfil any of its regulatory and/or legal obligations;".

		<p>2. Insertion of paragraph 1.5(d) “whether, in the opinion of IDA, the Prospective New Entrant Bidder has the requisite management skills, competencies, operational experience, and/or technical knowledge or ability pertaining to the Singapore telecommunication market, specifically in the running and provisioning of telecommunication systems and/or services, including the provisioning of retail telecommunication services to consumers in Singapore;”.</p> <p>3. Insertion of paragraph 1.5(f) “whether the Prospective New Entrant Bidder’s shareholding, associates or affiliates (as defined in the Telecom Competition Code), whether in Singapore or elsewhere, would give rise to concerns of anti-competitive preferences set out in Section 8.3 of the Telecom Competition Code;”</p> <p>4. Amended paragraph 1.5(g) to read “whether there are any security or public interest concerns or whether it would be in the public interest for the Prospective New Entrant Bidder to be granted the spectrum included in the New Entrant Spectrum Lot;”</p>
74	Section B paragraph 2.8	Corrected to read “The New Entrant Bidder that is provisionally awarded the New Entrant Spectrum Lot shall pay the amount of its Winning Bid in the New Entrant Spectrum Auction and other associated fees within fifteen (15) Business Days of being issued the Provisional Award Notice.”.
75	Section B paragraph 3.1	Amended paragraph 3.1 to read “IDA may, at its sole and absolute discretion, determine that a New Entrant Bidder shall forfeit up to the Guaranteed Amount of its Bank Guarantee(s) for any conduct that IDA considers to be acting in a manner that is prejudicial to the New Entrant Spectrum Auction, and/or failing to comply with one or more provisions in the Auction Rules and/or the procedures relating to the New Entrant Spectrum Auction. For the avoidance of doubt, the Forfeiture Amount shall be determined by IDA in its sole and absolute discretion. Where the Forfeiture Amount does not exceed the Bidder’s aggregate Guaranteed Amount under all of its Bank Guarantee(s), IDA shall be entitled to draw down and retain all Forfeiture Amounts secured by that Bidder’s Guaranteed Amount in its Bank Guarantee(s) as submitted to IDA. Where the Forfeiture Amount exceeds the Bidder’s Guaranteed Amount under all of its Bank Guarantee(s), IDA shall also be entitled to draw down and retain the full Guaranteed Amount in the Bidder’s Bank Guarantee(s) as submitted to IDA; and in addition to this, the Bidder shall be required to pay promptly to IDA the additional amount equivalent to the difference between the Forfeiture Amount and Guaranteed Amount, failing which

		IDA reserves the right to recover the said additional amount through such legal or regulatory means as are appropriate.”
76	Section C paragraph 1.5	Amended paragraph 1.5 to read “If IDA, at its sole and absolute discretion, determines that the Quantity Stage of the General Spectrum Auction will proceed, IDA will notify Bidders of the timetable for the General Spectrum Auction and a list of all participating Bidders. An Information Session and a Training Session will be held to allow Bidders to familiarise themselves with the procedures for the Quantity Stage. Representatives of each Bidder, in addition to the Bidder’s Authorised Representatives, will be permitted to attend the Information Session and Training Session, provided that no more than ten (10) natural persons (including the Authorised Representatives) may attend on behalf of any Bidder.”
77	Section C paragraph 2.17	Corrected to read “IDA will determine whether the Assignment Stage will further proceed, and inform all Winning Bidders of the outcome within five (5) Business Days of the Assignment Stage Phase 1 deadline (or such later date as is determined by IDA).”
78	Section C paragraph 3.1	Corrected to read “IDA will inform all Winning Bidders of the results of the Assignment Stage within five (5) Business Days of the close of this Stage (or such later date as is determined by IDA).”
79	Section C paragraph 4.1	Amended paragraph 4.1 to read “IDA may determine that a Bidder will forfeit up to the Guaranteed Amount of its Bank Guarantee(s) for any failure to comply with one or more provisions in the Auction Rules and/or procedures relating to the General Spectrum Auction, and/or any conduct which IDA considers to be acting in a manner that is prejudicial to the General Spectrum Auction. For the avoidance of doubt, the Forfeiture Amount shall be determined by IDA in its sole and absolute discretion. Where the Forfeiture Amount does not exceed the Bidder’s aggregate Guaranteed Amount under all of its Bank Guarantee(s), IDA shall be entitled to draw down and retain all Forfeiture Amounts secured by that Bidder’s Guaranteed Amount in its Bank Guarantee(s) as submitted to IDA. Where the Forfeiture Amount exceeds the Bidder’s Guaranteed Amount under all of its Bank Guarantee(s), IDA shall also be entitled to draw down and retain the full Guaranteed Amount in the Bidder’s Bank Guarantee(s) as submitted to IDA; and in addition to this, the Bidder shall be required to pay promptly to IDA the additional amount equivalent to the difference between the Forfeiture Amount and Guaranteed Amount, failing which IDA reserves the right to recover the said additional amount through such legal or regulatory means as are appropriate.”

S/N	Reference	Key Amendments
Specific FBO Licence Requirements		
80	Condition 1.2(e)	Condition 1.2(e) has been amended to “shall ensure that the Winning New Entrant Bidder, its associates who can exercise significant influence and its key responsible persons (whether such persons are or will be employed) comply with the ‘Fit and Proper Person Criteria’ set out in Appendix 13 of the Auction Rules. In the event a key responsible person ceases to comply with the ‘Fit and Proper Person Criteria’ set out in Appendix 13 of the Auction Rules, the Winning New Entrant Bidder shall immediately inform IDA and remove the key responsible person from the Winning New Entrant Bidder’s employ and/or require the key responsible person to cease all his involvement with the Winning New Entrant Bidder. Additionally, if the Winning New Entrant Bidder intends to replace the key responsible person, the Winning New Entrant Bidder shall seek and obtain IDA’s prior written approval.”.

S/N	Reference	Key Amendments
Auction Rules		
81	Section 2.2.3	<ol style="list-style-type: none"> 1. Insertion of Section 2.2.3 (c) “whether, in the opinion of IDA, such person has the relevant personnel, sufficient resources and/or adequate commitment to Singapore, including the composition of the board and management team and the shareholding, to be able to fulfil any of its regulatory and/or legal obligations;”. 2. Insertion of Section 2.2.3 (d) “whether, in the opinion of IDA, such person has the requisite management skills, competencies, operational experience, and/or technical knowledge or ability pertaining to the Singapore telecommunication market, specifically in the running and provisioning of telecommunication systems and/or services, including the provisioning of retail telecommunication services to consumers in Singapore;”. 3. Insertion of Section 2.2.3 (f) “whether such person’s shareholding, associates or affiliates (as defined in the Code of Practice for Competition in the Provision of Telecommunication Services (“Telecom”

S/N	Reference	Key Amendments
Auction Rules		
		<p>Competition Code”)), whether in Singapore or elsewhere, would give rise to concerns of anti-competitive preferences set out in Section 8.3 of the Telecom Competition Code;”.</p> <p>4. Amended Section 2.2.3(g) to read “whether there are any security or public interest concerns or whether it would be in the public interest for such person to be granted the spectrum included in the New Entrant Spectrum Lot;”.</p>
82	Section 6.4.1	Section 6.4.1 has been amended to include “and are eligible to place a Bid in the next Round”.
83	Section 7.1	<p>1. A footnote is inserted to clarify when the New Entrant Spectrum Auction closes.</p> <p>2. Similarly Section 16.1 is amended to clarify when the Quantity Stage of the General Spectrum Auction closes.</p>
84	Section 7.6	<p>Section 7.6 has been amended to read “After the time for submission of Best Offer Bids has expired, IDA will determine the Winning New Entrant Bidder in accordance with the principles as set out in Section 7.2. If there is a tie for highest Best Offer Bid, IDA will conduct additional Best Offer Rounds by repeating the process as set out in Sections 7.2 to 7.5 (with the necessary modifications) up to two more times (i.e. up to three Best Offer Rounds in total), provided that each New Entrant Bidder’s subsequent Best Offer Bid must be at least as high as its previous Best Offer Bid. For each additional Best Offer Round, only New Entrant Bidders that had the tied highest Best Offer Bid will be eligible to submit a new Best Offer Bid. If, after the completion of three Best Offer Rounds, there is still more than one New Entrant Bidder who placed Valid Bids that are tied highest Best Offer Bids, each such New Entrant Bidder will be randomly assigned a random number generated by a random number generator. The New Entrant Bidder with the highest such random number is prima facie entitled to be the Winning New Entrant Bidder, subject to Section 7.9.”</p> <p>More details on the random tie-break method will be provided during the Information Session and/or Training Session of the New Entrant Spectrum Auction.</p>

S/N	Reference	Key Amendments
Auction Rules		
85	Section 8.3.2	<ol style="list-style-type: none"> 1. Insertion of new 8.3.2 (c) “if that Bidder is the Winning New Entrant Bidder and fails to pay (a) the New Spectrum Lot Fee; and (b) all other associated fees as set out in Section 19.3 and/or the Provisional Award Notice within fifteen (15) Business Days from the date of the Provisional Award Notice;” and 2. Insertion of new Section 8.3.2 (e) “if that Bidder does not comply with any of its obligations under these Auction Rules;”.
86	Section 8.3.3	<ol style="list-style-type: none"> 1. Section 8.3.3 has been amended to read “The amount which shall be forfeited by a New Entrant Bidder or a Prospective New Entrant Bidder (as the case may be) in any of the circumstances specified in Section 8.3.2 shall be determined by IDA, at IDA’s sole and absolute discretion, and IDA shall be absolutely entitled to draw down and retain all Forfeiture Amounts secured by that Bidder’s Guaranteed Amount in its Bank Guarantee(s) as submitted to IDA, provided that the aggregate of the amounts forfeited by that New Entrant Bidder shall not exceed that Bidder’s Guaranteed Amount under all of its Bank Guarantee(s) at the time the Forfeiture is determined.”. <p>For the avoidance of doubt, the Forfeiture Amount shall be determined by IDA in its sole and absolute discretion. Where the Forfeiture Amount does not exceed the Bidder’s aggregate Guaranteed Amount under all of its Bank Guarantee(s), IDA shall be entitled to draw down and retain all Forfeiture Amounts secured by that Bidder’s Guaranteed Amount in its Bank Guarantee(s) as submitted to IDA. Where the Forfeiture Amount exceeds the Bidder’s Guaranteed Amount under all of its Bank Guarantee(s), IDA shall also be entitled to draw down and retain the full Guaranteed Amount in the Bidder’s Bank Guarantee(s) as submitted to IDA; and in addition to this, the Bidder shall be required to pay promptly to IDA the additional amount equivalent to the difference between the Forfeiture Amount and Guaranteed Amount, failing which IDA reserves the right to recover the said additional amount through such legal or regulatory means as are appropriate.</p> <p>To clarify, any draw down and/or retention of the Forfeiture Amount does not preclude IDA from imposing additional financial penalties or amounts on a New Entrant Bidder or a Prospective New Entrant Bidder in any of the circumstances specified in Section 8.2.1 and Section 8.3.2.</p>

S/N	Reference	Key Amendments
Auction Rules		
		<ol style="list-style-type: none"> <li data-bbox="521 312 2036 384">2. The same applies to Section 18.2.3 for a Bidder or a Prospective Bidder in any of the circumstances specified in Section 18.2.2. <li data-bbox="521 432 1800 472">3. The definition of “Forfeiture Amount” in the Auction Rules has been amended for clarity.
87	Section 9.2.4	<ol style="list-style-type: none"> <li data-bbox="521 515 2036 675">1. Amended Section 9.2.4(c) to read “whether there are any security or public interest concerns or whether it would be in the public interest for such person to be granted a 700 MHz Spectrum Right (2016) and/or a 900 MHz Spectrum Right (2016) and/or a 2.3 GHz Spectrum Right (2016) and/or a 2.5 GHz Spectrum Right (2016);”. <li data-bbox="521 746 2036 818">2. Insertion of Section 9.2.4(d) “any facts, circumstances or matters as set out in the applicant’s Initial Offer Document; and”.
88	Section 10.9	<p data-bbox="521 863 2036 1370">Section 10.9 has been amended to align with Section 3.8, “Representatives of each Bidder, in addition to the Bidder’s Authorised Representatives, will be permitted to attend the Information Session and Training Session, provided that no more than ten (10) natural persons (including the Authorised Representatives) may attend on behalf of any Bidder. Each Bidder must submit to IDA as part of its Initial Offer Document, a complete list of its representatives (other than Authorised Representatives) whom it proposes to attend the Information Session on behalf of that Bidder, including their respective names and identity card/passport numbers. Any person (other than Authorised Representatives) not included in such a list will not be permitted to attend the Information Session. A Bidder may replace any of the representatives identified in such list at any time prior to the commencement of the Information Session upon written notification to IDA submitted in accordance with Section 25.1 provided that such replacement has previously been named in the Disclosure List of that Bidder’s Initial Offer Document. Such notification must identify the representatives (by their respective names and identity card/passport numbers) whom the Bidder wants to replace, and provide the names and identity card/passport numbers of the representatives to be appointed in replacement thereof.”</p>

S/N	Reference	Key Amendments
Auction Rules		
89	Section 14.3.4	<p>Section 14.3.4 has been amended to provide more clarity, “A Bidder that places a Bid in which there are strictly positive Switch Amounts for more than one Category must assign a switch priority for each such Category. The switch priority is a positive integer where “1” represents the highest priority. If the request for the switch is partially, but not completely, accepted, and there is more than one (1) combination of lots in different Categories which can partially fulfil the Bidder’s request, the IDA will decide on which combination to select using the following steps:</p> <ul style="list-style-type: none"> i. first, IDA will eliminate all combinations that violate any of the provisions in Sections 1.2 and 1.3; ii. second, if there is still more than one combination remaining, IDA will eliminate all combinations that do not lead to the lowest amount of Free Eligibility being created; and iii. third, if there is still more than one combination remaining, IDA will use the switch priority to select between the remaining combinations.”.
90	Section 14.4.1	<p>Section 14.4.1 has been amended to provide more clarity, “Any Bid in which the Bidder changes the number of Spectrum Lots bid for at the Standing Price in a Category compared to its Bid in the previous Round will be deemed a request by the Bidder to change its Bid for Spectrum Lots in that Category from the previous Round. The IDA will only accept wholly or partially such request to the extent that this does not lead to Spectrum Lots being unallocated or violates any of the provisions in Sections 1.2, 1.3 and 14.3.1. If the Bidder’s request cannot be accepted, either in whole or in part, the IDA will require the Bidder to hold Standing High Bids at a price that is no higher than the price at which the Bidder freely bid for some or all of these Spectrum Lots.”</p>
91	Section 18.2.2	<ol style="list-style-type: none"> 1. Insertion of new Section 18.2.2 (c) “if that Bidder is a Winning Bidder and fails to pay the entire amount payable pursuant to Section 20.3 on or prior to the Payment Date or (if applicable) the Deferred Payment Date;”. 2. Amended Section 18.2.2 (e) “if that Bidder does not comply with any of its other obligations under these Auction Rules;”.

S/N	Reference	Key Amendments
Auction Rules		
92	Section 20.2	Section 20.2 has been corrected to include Prospective New Entrant Bidders and New Entrant Bidders who may be subject to one or more Forfeitures during the New Entrant Spectrum Auction.
93	Definition of “Forfeiture Amount”	Definition of “Forfeiture Amount” has been amended to “ Forfeiture Amount means the aggregate of any Forfeitures to be settled by a Prospective New Entrant, New Entrant, Prospective Bidder, Bidder, New Entrant Winning Bidder or Winning Bidder (as the case may be), to be determined by IDA based on its sole and absolute discretion.”
94	Overall	Additional worked examples have been included as Annex 2 to illustrate various scenarios in the New Entrant Spectrum Auction and the General Spectrum Auction.

S/N	Reference	Key Amendments
Expression of Interest Document		
95	Section 1.6	Section 1.6 has been amended to read “The Applicant shall also provide the curriculum vitae of the proposed members of the management and key responsible persons indicated in this segment of the Applicant’s Expression of Interest Document using the format provided in Schedule 1. Please highlight familiarity, experience and/or expertise with the Singapore telecommunication market, management skills and competencies in the running and provisioning of telecommunication systems and/or services, and experience in providing retail telecommunication services to consumers in Singapore.”.
96	Section 1.7B(a)	Section 1.7B(a) has been amended to read “proposed mobile system that will be deployed (including the relevant technology that will be used). This shall include an overview of the proposed network design (such as the network configuration and facilities), its network rollout plan, strategy to implement the network rollout plan, and how it would ensure the integrity and resiliency of its network;”.
97	Section 1.8	1. Section 1.8(a) has been corrected to read “detailed business plans, including but not limited to the projected profit and loss accounts, balance sheets and cash flow statements minimally from 1 January 2017 to 31 December 2021. The profit and loss accounts, balance sheets and cash flow statements

S/N	Reference	Key Amendments
Expression of Interest Document		
		<p>shall be prepared in accordance with the Singapore Financial Reporting Standards. All assumptions used (e.g., asset depreciation policies, subscriber projections, annual increase/decrease in operating expenditure, planned service offerings) shall be clearly explained”.</p> <p>2. The detailed plan for the submission of working capital requirements in Section 1.8(d) has been updated from “...1 January 2017 to 31 December 2017” to “...1 January 2017 to 31 December 2021” to be consistent with the requirements of the financial projections provided in Section 1.8(a).</p> <p>3. Reference to “<i>See Note 1.8</i>” has been removed as there is no accompanying note for this Section.</p> <p>4. Added the requirement for the Applicant to “submit (a) the Financier’s pre-term sheet due diligence report and/or findings, and assessment of the Applicant’s business plan; and (b) any other independent third-party assessment/opinion of the Applicant’s business plan”.</p>
98	Section 1.9	Reference to “ <i>See Note 1.9</i> ” has been removed as there is no accompanying note for this Section.
99	Table A	Table A has been amended to align with the Fit and Proper Person Criteria.

S/N	Reference	Key Amendments
Initial Offer Document		
100	Section 1.4(a)	Section 1.4(a) has been amended to read “proposed mobile system that will be deployed (including the relevant technology that will be used). This shall include an overview of the proposed network design (such as the network configuration and facilities), its network rollout plan, strategy to implement the network rollout plan, and how it would ensure the integrity and resiliency of its network;”.

S/N	Reference	Key Amendments
700 MHz Spectrum Right (2016)		
101	Condition 1.2	Condition 1.2 has been amended to read “The Grantee acknowledges that this 700 MHz Spectrum Right (2016) was granted to the Grantee on the basis of allocation specified in the procedures and conditions of participation issued by the IDA pursuant to Regulation 7 of the Telecommunications (Radio-communication) Regulations, and as amended or varied by IDA from time to time (hereinafter referred to as the “Auction Rules”). The Grantee hereby represents and warrants that it has complied with the Auction Rules and has not been involved in any act or omission of any act, constituting a breach of the Auction Rules, and shall fully comply with all requirements as IDA may determine for the grant of this 700 MHz Spectrum Right (2016).”.

S/N	Reference	Key Amendments
900 MHz Spectrum Right (2016)		
102	Condition 1.2	Condition 1.2 has been amended to read “The Grantee acknowledges that this 700 MHz Spectrum Right (2016) was granted to the Grantee on the basis of allocation specified in the procedures and conditions of participation issued by the IDA pursuant to Regulation 7 of the Telecommunications (Radio-communication) Regulations, and as amended or varied by IDA from time to time (hereinafter referred to as the “Auction Rules”). The Grantee hereby represents and warrants that it has complied with the Auction Rules and has not been involved in any act or omission of any act, constituting a breach of the Auction Rules, and shall fully comply with all requirements as IDA may determine for the grant of this 900 MHz Spectrum Right (2016).”.

S/N	Reference	Key Amendments
2.3 GHz Spectrum Right (2016)		
103	Condition 1.2	Condition 1.2 has been amended to read “The Grantee acknowledges that this 700 MHz Spectrum Right (2016) was granted to the Grantee on the basis of allocation specified in the procedures and conditions of participation issued by the IDA pursuant to Regulation 7 of the Telecommunications (Radio-communication) Regulations, and as amended or varied by IDA from time to time (hereinafter referred to as the “Auction Rules”). The Grantee hereby represents and warrants that it has complied with the Auction Rules and has not been involved in any act or omission of any act, constituting a breach of the Auction Rules, and shall

S/N	Reference	Key Amendments
2.3 GHz Spectrum Right (2016)		
		fully comply with all requirements as IDA may determine for the grant of this 2.3 GHz Spectrum Right (2016).”.

S/N	Reference	Key Amendments
2.5 GHz Spectrum Right (2016)		
104	Condition 1.2	Condition 1.2 has been amended to read “The Grantee acknowledges that this 700 MHz Spectrum Right (2016) was granted to the Grantee on the basis of allocation specified in the procedures and conditions of participation issued by the IDA pursuant to Regulation 7 of the Telecommunications (Radio-communication) Regulations, and as amended or varied by IDA from time to time (hereinafter referred to as the “Auction Rules”). The Grantee hereby represents and warrants that it has complied with the Auction Rules and has not been involved in any act or omission of any act, constituting a breach of the Auction Rules, and shall fully comply with all requirements as IDA may determine for the grant of this 2.5 GHz Spectrum Right (2016).”.

S/N	Reference	Key Amendments
Fit and Proper Person Criteria		
105	Page 3	Amended to read “The objective of the Fit and Proper Person Criteria is to ensure that all relevant persons, at a minimum, have a strong financial standing, are fully committed and capable entities, possess integrity and credibility, do not raise significant reputational concerns, and do not raise public interest concerns before they are allowed to participate in the NESAs.”
106	Page 5	Insertion of “The Fit and Proper Person Criteria are not discrete or mutually exclusive requirements. Instead, they shall be read in conjunction with each other and holistically, in order to give full effect to the spirit and intent of the criteria.”
107	Criterion 1	1. Insertion of Criterion 1A(i) “whether the relevant person’s shareholding, associates or affiliates (as defined in the Code of Practice for Competition in the Provision of Telecommunication Services (“Telecom

S/N	Reference	Key Amendments
Fit and Proper Person Criteria		
		<p>Competition Code))), whether in Singapore or elsewhere, would give rise to concerns of anti-competitive preferences set out in Section 8.3 of the Telecom Competition Code;”.</p> <p>2. Insertion of Criterion 1B(n) “may, with his participation in the NESAs, raise any security or public interest concerns and/or other factors which could be contrary to the public interest.”.</p>
108	Criterion 2	<p>1. Criterion 2A(b) has been amended to read “lacks relevant personnel, sufficient resources and/or adequate commitment to Singapore, including the composition of the board and management team and the shareholding, to be able to fulfil any of its regulatory and/or legal obligations; and/or”.</p> <p>2. Insertion of Criterion 2A(c) “lacks the requisite management skills, competencies, operational experience, and/or technical knowledge or ability pertaining to the Singapore telecommunication market, specifically in the running and provisioning of telecommunication systems and/or services, including the provisioning of retail telecommunication services to consumers in Singapore.”.</p> <p>3. Criterion 2B(b) has been amended to read “lacks the requisite management skills, competencies, knowledge, expertise, qualifications and/or experience or abilities pertaining to the Singapore telecommunication market, having regard to the nature of the duties he is required to perform, specifically in the running and provisioning of telecommunication systems and/or services, including the provisioning of retail telecommunication services to consumers in Singapore.”.</p>