

IMDA's reference: IMDA.INTC.03.0301/JTBT

4 September 2023

Singapore Telecommunications Limited  
31 Exeter Road  
#05-00 Comcentre  
Singapore 239732

Attention: Mr Sean Slattery  
Vice-President, Regulatory & Interconnect

**By Email**  
No. of pages: 4  
(including this page)

Dear Mr Slattery

**NOTIFICATION OF PROPOSED DIRECTION UNDER SECTION 31 OF THE  
TELECOMMUNICATIONS ACT 1999 IN RESPECT OF THE REVIEW OF SINGAPORE  
TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER**

1. Pursuant to Section 31(5) of the Telecommunications Act 1999 (the "**Act**"), IMDA hereby notifies Singapore Telecommunications Limited ("**Singtel**") that IMDA intends to issue a Direction under Section 31 of the Act to require Singtel to submit to IMDA for review and approval, Singtel's further proposed modifications ("**Singtel's Further Proposed Modifications**") to its Reference Interconnection Offer (""). A copy of IMDA's proposed direction is enclosed ("**IMDA's Proposed Direction**").
2. Any representations or comments in relation to IMDA's Proposed Direction shall be submitted **within fourteen (14) days** from the date of this letter. IMDA may amend the requirements set out in IMDA's Proposed Direction as it deems appropriate based on any relevant factors including, but not limited to, any representations received.
3. Should you require any clarification, please direct your written queries to the undersigned via email at [ILO@imda.gov.sg](mailto:ILO@imda.gov.sg). Unless otherwise specified by IMDA in writing, any request for clarification shall not affect the timeframe for the submission of any representations or comments, as stipulated in paragraph 2 above.

Yours sincerely,

Ong Tong San  
Senior Director (Market Access & Competition Development)  
For Director-General (Telecoms & Post),  
Deputy Chief Executive (Connectivity Development & Regulation)

**[Proposed Direction under Section 31 of the Telecommunications Act 1999]**

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[ Date ]

Singapore Telecommunications Limited  
31 Exeter Road  
#05-00 Comcentre  
Singapore 239732

Attention: Mr Sean Slattery  
Vice-President, Regulatory & Interconnect

Dear Mr Slattery

**DIRECTION OF THE INFO-COMMUNICATIONS MEDIA DEVELOPMENT AUTHORITY: REVIEW  
OF SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER**

1. The Info-communications Media Development Authority ("**IMDA**"), pursuant to Section 31(1) of the Telecommunications Act 1999 (the "**Act**") and Condition 35.1 of the Licence to Provide Facilities-Based Operations issued to Singapore Telecommunications Limited ("**Singtel**") on 1 April 1992 and renewed on 1 April 2017, hereby issues this Direction to Singtel.
2. Reference is made to the following:
  - (a) the public consultation issued by IMDA on 22 February 2023 ("**Public Consultation**") to seek views and comments on Singtel's proposed changes to its Reference Interconnection Offer ("**RIO**") (the "**Proposed Revised RIO**");
  - (b) IMDA's decisions to the Public Consultation issued on 4 September 2023 (the "**IMDA's Decision**"); and
  - (c) the notification of IMDA's proposed Direction dated 4 September 2023 ("**Notification of Proposed Direction**"), with the accompanying directed modifications.
3. Following the close of the Public Consultation, IMDA has given careful consideration to respondents' submissions and assessed that certain parts of the Proposed Revised RIO require further modifications to take into account industry's and IMDA's concerns. IMDA's views and decision are set out in the IMDA's Decision.

4. Pursuant to this Direction, IMDA hereby directs Singtel to submit the following to IMDA for IMDA's review and approval:
  - (a) Singtel's further proposed modifications to the Proposed Revised RIO ("**Singtel's Further Proposed Modifications**") to give effect to IMDA's Decision and IMDA's required modifications as specified in the following appendices to this Direction:
    - (i) Appendix 1: Directed modifications to the Main Body of Singtel's RIO;
    - (ii) Appendix 2: Directed modifications to Schedule 1 – Physical and Virtual (Distant) Interconnection;
    - (iii) Appendix 3: Directed modifications to Schedule 5A – Licensing of Lead-in Duct & Lead-in Manholes;
    - (iv) Appendix 4: Directed modifications to Schedule 8B – Access to Mandated Services; and
    - (v) Appendix 5: Directed modifications to Schedule 13 – Licensing of CDN;(together, the "**Directed Modifications**"); and
  - (b) Singtel's proposed modifications for any ancillary or consequential changes to any provisions or schedules in Singtel's RIO, as where necessary, in order to give effect to this Direction.
5. In addition, while pending the above submissions from Singtel, IMDA conditionally approves the following schedules of the Proposed Revised RIO as there is no objection from industry on the Singtel's proposed changes for these schedules:
  - (a) Schedule 2A – Call Origination Service;
  - (b) Schedule 2B – Call Termination Service;
  - (c) Schedule 2C – Call Transit Service;
  - (d) Schedule 4A – Emergency Call Service;
  - (e) Schedule 4B – Submarine Cable Connection Service;
  - (f) Schedule 8 – Co-location;
  - (g) Schedule 8 – Attachments;

- (h) Schedule 8A – Co-location for Point of Interconnection (POI); and
  - (i) Schedule 8D – Co-location at Submarine Cable Landing Station.
6. As for RIO Schedule 9 – Charges, IMDA is reviewing the charges and will issue the determined rates upon completion of the review.
7. Singtel shall submit to IMDA, **within four (4) weeks** of the date of this Direction, one marked-up softcopy of its RIO, incorporating the Directed Modifications. The softcopy submission shall be in Microsoft Word format and emailed to ILO@imda.gov.sg.
8. IMDA reminds Singtel that:
- (a) to the extent that any of Singtel's Further Proposed Modifications fails to give effect to IMDA's Directed Modifications or, in IMDA's view, is not acceptable, IMDA will direct Singtel to adopt specific drafting language; and
  - (b) IMDA may reject any of Singtel's Further Proposed Modifications that are not for the purpose of giving effect to IMDA's Directed Modifications as set out in this Direction.
9. Singtel is reminded of its obligation to comply with this Direction under Section 31(6) of the Act.
10. Should you require any clarification, please direct your written queries to the undersigned via email at ILO@imda.gov.sg. Please note that any query from Singtel to IMDA for clarification shall not affect Singtel's obligation to comply fully with this Direction, including the timeline specified in this Direction.

Yours sincerely,

Aileen Chia  
Director-General (Telecoms & Post),  
Deputy Chief Executive (Connectivity Development & Regulation)