



CONSULTATION PAPER ISSUED BY
THE INFOCOMM MEDIA DEVELOPMENT AUTHORITY
ON
THE REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S
REFERENCE INTERCONNECTION OFFER

22 FEBRUARY 2023

INTRODUCTION

1. The Code of Practice for Competition in the Provision of Telecommunication and Media Services ("**Code**") came into effect on 2 May 2022, following the completion of the public consultation by the Infocomm Media Development Authority ("**IMDA**"). The Code incorporates IMDA's decision to remove the following services from regulation, as there has been no take-up of these services over the past 5 years and longer:
 - (a) unbundled network elements, namely local loops, sub-loops, line sharing, distribution frame access and internal wiring¹;
 - (b) unbundled network service, namely tail local leased circuits²; and
 - (c) support facilities, namely co-location at roof sites³,(collectively, the "**Services With No Take-up**").
2. Pursuant to the Code, the Dominant Telecommunication Licensee is required to submit to IMDA, for approval, the proposed modifications to its Reference Interconnection Offer ("**RIO**") to conform to the requirements of the Code. The RIO sets out IMDA-approved prices, terms and conditions which serves to reduce the timeframe for interconnection negotiations, expedite market entry and promote effective competition.
3. Accordingly, Singapore Telecommunications Limited ("**Singtel**"), being the designated Dominant Telecommunication Licensee, submitted to IMDA a proposed revised RIO to incorporate the requirements in the Code (including the removal of the Services With No Take-up in the RIO), as well as Singtel's initiated proposed changes to the RIO.
4. The last holistic review of the RIO was completed in 2012. Since then, IMDA has conducted various ad-hoc reviews of individual RIO schedules to take into account industry feedback (such as changes related to the access to lead-in ducts and associated manholes) and to reflect new regulated services under the RIO (such as the access to submarine cable common duct networks).
5. IMDA notes the telecommunication landscape has evolved rapidly in recent years and it is timely to conduct a holistic review on the specific terms and conditions of the RIO to ensure their continued relevance.

¹ Specific to Singtel's RIO only, the relevant schedules that would be removed are: Schedule 3A – Licensing of Local loop/Sub-loop, Schedule 3B – Line Sharing, Schedule 3C – Sale of Internal Wiring, Schedule 3D – Licensing of Building MDF Distribution Frame and Schedule 3E – Licensing of Outdoor Cabinet Distribution Frame.

² Specific to Singtel's RIO only, the relevant schedule that would be removed is Schedule 4C – IRS Tail Circuit Service.

³ Specific to Singtel's RIO only, the relevant schedule that would be removed is Schedule 5C – Licensing of Roof Space and Co-location Space at Roof Sites.

6. Pursuant to section 6.3.6 of the Code, IMDA is conducting a public consultation to seek views and comments on Singtel's proposed revised RIO.
7. The proposed revised RIO contains the following parts:
 - (a) Main Body of the RIO; and
 - (b) Schedules of the RIO:
 - Schedule 1 – Physical and Virtual (Distant) Interconnection
 - Schedule 2A – Call Origination Service
 - Schedule 2B – Call Termination Service
 - Schedule 2C – Call Transit Service
 - Schedule 4A – Emergency Call Service
 - Schedule 4B – Submarine Cable Connection Service
 - Schedule 5A – Licensing of Lead-in Duct & Lead-in Manholes
 - Schedule 8 – Co-location
 - Schedule 8 – Attachments
 - Schedule 8A – Co-location for Point of Interconnection (POI)
 - Schedule 8B – Access to Mandated Services
 - Schedule 8D – Co-location at Submarine Cable Landing Station
 - Schedule 9 – Charges
 - Schedule 13 – Licensing of CDN,
- (collectively, the “**Submitted RIO Documents**”).
8. Please note that the Submitted RIO Documents are associated and should be read with the following approved RIO documents:
 - (a) Schedule 10 – Billing;
 - (b) Schedule 11 – Dispute Resolution; and

(c) Schedule 12 – Dictionary,

(collectively, the “**RIO Associated Documents**”).

9. The RIO Associated Documents are approved by IMDA and published on IMDA’s website. The webpage hyperlink is as follows:

<https://www.imda.gov.sg/regulations-and-licensing-listing/interconnection-and-access-agreements/singtel-s-reference-interconnection-offer--rio>

PROPOSED CHANGES

10. The key proposed changes initiated by Singtel and the corresponding reasons for the proposed changes are as follows:
- (a) To require Services-Based Operations licensees (“**SBOs**”) to provide insurance coverage of \$1 million under the RIO. This is to ensure SBOs are sufficiently covered to address any liability under the RIO;
 - (b) To require Requesting Licensees who have taken up services from Schedule 2A, 2B or 2C (i.e., Call Origination, Call Termination or Call Transit) to provide either a banker’s guarantee or security deposit of \$30,000. This is to address issues of bad debts and financial risks at Singtel’s end, especially arising from cessation charges which are payable to Singtel only after the Requesting Licensee terminates the services under Schedule 2A, 2B or 2C. Specifically, Singtel proposed the \$30,000 security deposit/banker’s guarantee to address cases where some Requesting Licensees are not required under RIO to place security deposit/banker’s guarantee with Singtel, and the latter may not be able to recover such cessation charges from these operators when the services are terminated; and
 - (c) To remove the alternative interconnection configuration where a Facilities-Based Operations licensee (“**FBO**”) will no longer have the option to interconnect to only one Singtel’s Interconnect Gateway Switch (“**IGS**”) serving the East zone and only one Singtel’s IGS serving the West zone. This is to take into account the increased need for resilience and security, and to ensure that interconnection with Singtel is provided with greater diversity for network resilience.
11. These key changes are proposed by Singtel to apply to both existing and future Requesting Licensees of the RIO.

INVITATION TO COMMENT

12. IMDA invites interested parties to submit written comments to this consultation on Singtel's proposed changes in the Submitted RIO Documents.
13. In its submission, the respondent should include the following:
 - (a) Respondent's statement of interest in the consultation;
 - (b) Summary of the respondent's submission; and
 - (c) Comments regarding specific provisions of the Submitted RIO Documents.
14. All respondents are requested to keep their comments clear and succinct. All views and comments should be submitted in soft copy (in both Adobe PDF and Microsoft Word format) via email to Consultation@imda.gov.sg with the email header "Consultation on RIO review".
15. All submissions should reach IMDA by **12 noon, 22 March 2023**. All views and comments should be addressed to:

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16. IMDA reserves the right to make public all or parts of any written submission made in response to this consultation, and to disclose the identity of the respondent. Any part of the submission which the respondent considers to be commercially sensitive must be clearly marked and placed as a separate annex to the comments raised. IMDA will take this into consideration when disclosing the information submitted.