

22 March 2023

MS. AILEEN CHIA

Director-General (Telecoms and Post)

Deputy CE (Connectivity Development & Regulation)

Infocomm Media Development Authority

10 Pasir Panjang Road

#03-01 Mapletree Business City

Singapore 117438

BY EMAIL

(consultation@mda.gov.sg)

Dear Ms. Chia,

CONSULTATION ON THE REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER

INTRODUCTION

1. We refer to the Public Consultation ("**Consultation Paper**") issued by the Info-Communications Media Development Authority ("**IMDA**") on the "The Review of Singapore Telecommunications Limited's Reference Interconnection Offer" dated 22 February 2023.
2. We thank IMDA for the opportunity to provide a response to the Consultation Paper. In this response, SIMBA Telecom Pte Ltd ("**Simba**") submits its views and comments regarding the Consultation Paper.

STATEMENT OF INTEREST

3. Simba is an Australian-owned Singapore incorporated company in the business of the provision of mobile telecommunication services; and has a Facilities-Based Operator (FBO) licence to provide mobile services in Singapore.

COMMENTS

4. **FIRST**, Simba expresses its disappointment that IMDA has followed through with the removal of "unbundled network elements, namely local loops, sub-loops, line sharing, distribution frame access and internal wiring", "unbundled network service, namely tail local leased circuits" and "support facilities, namely co-location at roof sites" (collectively, the "**Services**") from regulation as IMDA on the justification that there has been no take-up for the Removed Services for a period of 5 years or longer.
5. We state categorically that decision to remove the Services is premature, and the justification that IMDA had relied upon is gratuitous. It was short-sighted for IMDA to remove the Services without ample consideration that the use of such services is cyclic, and that the cycle for the use (and deployment) may well be more than 5 years (i.e. IMDA's reference period for no take-up).
6. In fact, Simba had explored taking up these Services prior to inadvertent removal, and are dismayed that such considerations were curtailed. We feel that the take-up cycle is refreshed, and the present may be the appropriate time to use these Services.
7. Needless to say, the reduction in possible services and equipment that the MNOs can deploy and use will not only affect our provision of quality services to our subscribers, but also hampers inter-operator competition. Ultimately, the interest of the consumers is affected.

SIMBA

8. **SECOND**, Simba is not in favor of the proposed change tabled in paragraph 10(c) of the Consultation Paper for the removal of the alternative interconnection configuration.
9. At the outset, we express that the removal of the alternative interconnection configuration should be the prerogative of IMDA as regulator instead of the Dominant Telecommunication Licensee because it ensures the neutrality of such a decision. The Dominant Telecommunication Licensee will inevitably have a vested interest in maintaining its market share over the other FBOs by raising the barrier to entry
10. With regard to this proposed change, we draw your attention to the following implications to the FBOs:
 - 10.1. Increased Cost: Interconnecting with more than one IGS would increase the cost of the FBO's operations, including the cost of equipment, maintenance, and personnel required to manage the additional interconnections.
 - 10.2. Complexity: Managing multiple interconnections can be complex and time-consuming. This could result in delays and potential service disruptions.
 - 10.3. Reduced Flexibility: Requiring FBOs to interconnect with multiple IGSs will reduce their flexibility in terms of choosing the interconnection architecture. This could limit their ability to offer competitive services and pricing to their customers.
11. It is also reasonably foreseeable that there may be Requesting Licensees to the RIO that are not within the scope of the supposed requirement relating to resiliency. In this regard, this requirement which only applies to FBOs would be unnecessarily anti-competitive.
12. We propose that IMDA step in at this juncture to stop the removal of the alternative interconnection configuration. There are other less-exploitable and anti-competitive measures that can be employed to ensure greater network resilience and security.
13. **THIRD**, Simba is heartened by IMDA's commitment to ensure that its regulations keep up with the rapid evolution of the telecommunication landscape in recent years, and to ensure that the RIO (amongst others) have continued relevance.
14. Simba hopes that IMDA will more astutely consider the views, support and opposition alike, expressed by the key industry players in response to your consultations.
15. We thank IMDA for the opportunity to provide our views to the Consultation Paper and hope that IMDA would take up our recommendations for the benefit of Singapore.

Yours sincerely,

Richard Chung Yaw Tan
CEO
SIMBA Telecom Pte. Ltd.