
CONSULTATION PAPER ISSUED BY

**THE INFO-COMMUNICATIONS MEDIA DEVELOPMENT
AUTHORITY**

ON

**THE REVIEW OF SINGAPORE TELECOMMUNICATIONS
LIMITED'S REFERENCE INTERCONNECTION OFFER**

**Submission by StarHub Ltd to the
Infocomm Media Development Authority**

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Introduction:

1. StarHub Ltd ("**StarHub**") thanks the Info-comm Media Development Authority of Singapore (the "**Authority**") for providing the opportunity to comment on the proposed amendments to the Reference Interconnection Offer ("**RIO**") by Singapore Telecommunications Limited ("**Singtel**").
2. We note that the primary purpose of the proposed RIO changes is to implement the Authority's decision to remove services which are no longer relevant from the RIO. We support this change. In addition, Singtel has also taken the opportunity to propose several other changes to the RIO, including changes which are unexplained and may potentially have an impact on service resiliency. Such changes should be disallowed.
3. StarHub's detailed comments on the proposed RIO changes are set-out below.

StarHub's Detailed Comments:

Additional security deposit / banker's guarantee requirement:

4. Singtel has raised concerns that it may not be able to recover cessation charges from some Requesting Licensees ("RLs") who terminate services under Schedules 2A, 2B or 2C of the RIO. To this end, Singtel has suggested to impose a new \$30,000 security deposit / banker's guarantee obligation on all RLs taking services under these three schedules.

5. We believe that this proposal is too broad, and unnecessarily impacts RLs who have good business reputations and no intention to cease the provision of voice services. We also note that Singtel already has the ability to request a banker's guarantee / security deposit of \$20,000 under Clause 2.5(e) of the Main Body of the RIO. It is therefore unclear why a new and additional banker's guarantee / security deposit requirement is needed.

6. We respectfully suggest that Singtel's ability to impose new security requirements should be limited to a subset of RLs (e.g., those who cannot meet minimum paid-up capital requirements, or without a minimum monthly volume of calls). This will then accurately target RLs that are potentially at risk of ceasing services, and failing to pay cessation charges.

Resiliency impacting changes:

7. Singtel has proposed removing the option for Facilities-based Operation licensees to interconnect to only one Singtel Interconnect Gateway Switch. Singtel has justified this change on the basis of an *"increased need for resiliency and security"*.

8. However, Singtel has separately also proposed two changes in Schedule 5A of the RIO which would reduce the overall resiliency for interconnected operators:

- Clause 9.4 – Singtel has proposed to increase the time taken to provide an estimated recovery timeline for defects from five to ten business days.

This change would delay the provision of estimated recovery timelines to RLs, and negatively impact the RLs' ability to plan alternatives, or update their customers affected by the defect.

- Clause 18.6 – Singtel is removing the obligation to provide prior notice to RLs if there is any pending closure of a Building MDF room.

It is unclear why this notification obligation is being removed as RLs will need advance notice of any potential disruptions to their services.

9. We therefore do not agree with Singtel's proposals. Given Singtel's concern over the resiliency of its own services, it should not seek to reduce the resiliency of services for its interconnected operators.

Conclusion:

10. In summary, StarHub's key points are as follows:

- We disagree with Singtel's proposal to impose a new security deposit / banker's guarantee on RLs taking services under Schedules 2A, 2B and 2C of the RIO. Any such new requirement should be targeted at a specific problem, rather than broadly affecting all RLs.
- Singtel should not seek to make changes to Schedule 5A of the RIO which will adversely affect the resiliency of its interconnected operators. Such proposed changes should be removed.

11. StarHub is grateful for the opportunity to comment on this matter and we appreciate the Authority's consideration of our comments.