

22 March 2023

Infocomm Media Development Authority  
10 Pasir Panjang Road #03-01  
Mapletree Business City  
Singapore 117438

Attn: Ms Aileen Chia  
Director-General (Telecoms and Post)  
Deputy Chief Executive (Connectivity Development & Regulation)

Dear Ms Chia,

**RE: CONSULTATION PAPER ON THE REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S  
REFERENCE INTERCONNECT OFFER**

1. We refer to the above dated 22 Feb 2023.
2. With reference to the proposed changes initiated by Singtel in 10(a), 10(b) 10(c) and 11 of the consultation paper.
  - a. For 10(a), as SuperInternet is an FBO, we have no comments on this proposal.
  - b. For 10(b), SuperInternet **does not** agree with this proposal. We consider the existing term outlined in Clause 2.5(e) of Singtel RIO (extracted below) provides sufficient protection for Singtel.

*"if the Requesting Licensee is requesting for service under this RIO Agreement for the first time and the paid up capital of the Requesting Licensee is less than S\$1,000,000, either a banker's guarantee or security deposit (at the Requesting Licensee's option) for the amount of S\$20,000;"*
  - c. For 10(c), SuperInternet is agreeable to remove the alternative configuration where an FBO will no longer have the option to interconnect to only one Singtel IGS serving the East Zone and only one Singtel IGS serving the West Zone. We agree this provides a suitable level of network resilience. We note that new interconnection arrangements will be required when the RIO shifts to SIP interconnection and that these arrangements are under review in a separate forum.
  - d. For 11, SuperInternet does not believe these changes should be retrospective, i.e. they should only apply to future Requesting Licensees. This applies particularly to comment 2(b) above regarding banker's guarantee or security deposit.

Thank you for your kind attention.

Yours Sincerely,

Yeo See Kiat  
CEO  
SuperInternet Access Pte Ltd