

## **Comments on Singtel's RIO for IP-based interconnection for voice services**

**Date:** 22 August 2025

**To:**

Aileen Chia (Ms)  
Director-General (Telecoms & Post)  
Deputy Chief Executive (Connectivity Development & Regulation)  
Infocomm Media Development Authority  
10 Pasir Panjang Road  
#03-01 Mapletree Business City  
Singapore 117438

**Subject: Consultation on RIO Offer for IP Interconnection**

Dear Ms. Chia,

**Comments:**

We understand that replacing the traditional Signalling System No. 7 (SS7) protocol with an IP-based signalling protocol introduces inherent security vulnerabilities. Furthermore, the increasing volume of IP-based traffic necessitates a move towards a more scalable and secure IP-based interconnection at points of interconnection (POIs).

As an SBO license holder, we currently maintain both IP-based interconnection and PSTN (ISDN) services with Singtel. We plan to migrate our remaining PSTN circuits to IP-based interconnection within the next 1–2 years.

In relation to the proposed Reference Interconnection Offer (RIO), we seek clarification on the following points:

1. Will there be any cost variation for IP-based interconnection services after 28 February 2027?
2. Will the new RIO necessitate any changes to our existing IP-based interconnection (SIP trunk)?
3. Will there be any impact on the current Number Retention Service (Number Porting) process?

Thank you for considering our queries. We look forward to your response.

Sincerely,

**Cal4care Pte Ltd**

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