

Our ref: Singtel/IMDA/19/023

1 August 2019

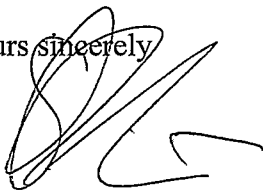
Senior Director (Market Access & Competition Development)  
Deputy Chief Executive (Policy, Regulation & Competition Development)  
Info-communications Media Development Authority of Singapore  
Attention: Mr Ong Tong San

Dear Mr Ong

**SUBMISSION TO THE CONSULTATION ON NUCLEUS CONNECT'S  
INTERCONNECTION OFFER**

1. We refer to the consultation on Nucleus Connect's Interconnection Offer (ICO) issued by the IMDA on 1 July 2019 (**Consultation Paper**).
2. Singtel agrees with the IMDA that it is timely for the IMDA to review the ICO to ensure that the services offered under the ICO remain relevant and are able to meet the demands and requirements of the industry and consumers with regard to services offered on the active infrastructure of the Next Generation Nationwide Broadband Network (NGNBN).
3. We attach hereto our comments to the Consultation Paper.
4. Please do not hesitate to contact us if you have any queries or require further clarification.
5. Thank you.

Yours sincerely



Sean Slattery  
Vice President  
Regulatory and Interconnect  
*Encl.*



## Executive Summary

5. Singtel makes the following key points in this submission:
- (i) Singtel supports Nucleus Connect's proposal to remove certain services with low or no demand from the ICO. Interested Contracting QPs may continue to obtain such services pursuant to Customised Agreements; and
  - (ii) Singtel supports Nucleus Connect's proposal to remove the subscriber's National Registration Identity Card (NRIC) field when applying for services under the ICO.

## Specific Comments

*Removal of services with low or no demand from the ICO*

6. Singtel supports Nucleus Connect's proposal to remove:
- (i) Class A and Class C bandwidths from the Residential Per-End-User Connection service;
  - (ii) the Express Service Activation Period for Residential Per-End-User Connection, Non-Residential Per-End-User Connection, L2 VPN, E-LAN and L3 VPN services; and
  - (iii) the B2B Option in its entirety from the Platform Connection Service schedule under the ICO.
7. Singtel recognises that Nucleus Connect would incur fixed costs to maintain and offer services under its ICO. These fixed costs will be incurred regardless of the level of demand and take-up for the services offered under the ICO. It would not be commercially viable to require Nucleus Connect to continue incurring costs to maintain and offer services under the ICO that are obsolete and/or are no longer in demand.

Subject to an objective review on the market requirements and Contracting QP take-up statistics, services that are low or declining in demand should be removed from the ICO and offered as products under the Customised Agreements to interested Contracting QPs.



*Removal of the NRIC field in all paper application forms.*

8. Singtel supports Nucleus Connect's proposal to remove the NRIC field in all paper application forms. The collection of the NRIC number is unnecessary as Nucleus Connect does not have a direct contractual relationship with the End-Users.

### **Conclusion**

9. In conclusion, Singtel supports:
  - (i) Nucleus Connect's proposal to remove certain services with low or no demand from the ICO. Interested Contracting QPs may continue to obtain such services pursuant to Customised Agreements; and
  - (ii) Nucleus Connect's proposal to remove the subscriber's NRIC field when applying for services under the ICO.