



CONSULTATION DOCUMENT

CONSULTATION ON NUCLEUS CONNECT'S INTERCONNECTION OFFER

1 JULY 2019

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INTRODUCTION

1. Since Nuclues Connect Pte Ltd ("**NC**") commenced its operation in 2009 and started offering its Interconnection Offer ("**ICO**") in 2010, the services and their respective bandwidths offered under the ICO have not been substantively reviewed. Considering that NC is now into its tenth year of operation as the Operating Company of the Nationwide Broadband Network ("**NBN**"), IMDA considered that it was an appropriate juncture to perform a review of 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 residential consumers with regard to services offered on the active infrastructure of the NBN.

REVIEW OF NUCLEUS CONNECT ICO

2. IMDA has been engaging NC on various changes to its ICO to ensure the above. IMDA has also sought and considered the views of the industry players on the NBN before setting out its required changes to the ICO ("**IMDA's Required Changes**"). IMDA's Required Changes can be found in the **Annex A** of this consultation document.
3. Accordingly, NC has submitted the changes to its ICO text ("**Draft Revised ICO**") to effect IMDA's Required Changes for IMDA's approval. NC also included NC Initiated Changes (which can be found in **Annex B** of this consultation document) in the Draft Revised ICO for IMDA's approval. The contents of the Draft Revised ICO are as follows:
 - (a) Appendix 1 – Master ICO Agreement;
 - (b) Appendix 2 – General Service Terms and Conditions; and
 - (c) Schedules to the ICO:
 - (i) Appendix 3 – Residential Per-End-User Connection Service;
 - (ii) Appendix 4 – Non-Residential Per-End-User Connection Service;
 - (iii) Appendix 5 – L2 VPN Service;
 - (iv) Appendix 6 – L3 VPN Service;
 - (v) Appendix 7 – E-LAN Service; and
 - (vi) Appendix 8 – Platform Connection Service.

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REQUEST FOR COMMENTS

4. As part of IMDA's review of NC's Draft Revised ICO, IMDA hereby invites interested parties to submit written comments on NC's proposed text changes on the Draft Revised ICO. In tandem, IMDA has completed its assessment of the prices for services offered under the NC ICO, for the 5-year period from March 2019 to February 2024. While NC had amended the ICO to reflect the determined prices, the prices will not be consulted under this consultation and are hence redacted from the service schedules of the ICO. IMDA will subsequently publish the determined prices when publishing the ICO with the approved terms and conditions.
5. IMDA requests that comments be presented in the following format:
 - (a) Description of the respondent and its interest in the proceedings;
 - (b) Summary of the respondent's position;
 - (c) General comments; and
 - (d) Views regarding specific provisions of the Draft Revised ICO.
6. In all comments, respondents should identify the specific provisions of the Draft Revised ICO (by paragraph/section number, where provided) to which comments are made. Where appropriate, respondents may suggest additional or alternative text, provided always that any such suggestions should be accompanied by an explanation of the reason(s) for the proposal. All respondents are requested to keep their comments clear and succinct. All views and comments should be submitted in writing in soft copy (in Microsoft Word format) to reach IMDA by **15 July 2019**.
7. For each set of comments, respondents are required to include their personal/company particulars as well as their correspondence address. Submissions should be addressed to:

Ong Tong San
Senior Director (Market Access & Competition Development)
For Director-General (Telecoms & Post), Deputy CE (Policy, Regulation & Competition Development)
Infocomm Media Development Authority
10 Pasir Panjang Road
#03-01 Mapletree Business City
Singapore 117438

Please submit soft copies via email to: Consultation@imda.gov.sg.

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8. IMDA reserves the right to make public all or parts of any written submissions made in response to this consultation, and to disclose the identity of the respondent. Any part of the submission which the respondent considers is commercially sensitive must be clearly marked and placed as a separate annex to the comments raised. IMDA will take this into consideration when disclosing the information submitted.

IMDA'S REQUIRED CHANGES

IMDA has required NC to make changes to the ICO with regard to the (a) 1 Gigabits per second ("**Gbps**") Gigabit Ethernet ("**GE**") Residential Service product (with symmetrical Peak Information Rate ("**PIR**") of 1 Gbps, 20 Megabits per second ("**Mbps**") Class B downlink Committed Information Rate ("**CIR**") and 25Mbps Class D downlink CIR) under the ICO ("**1 Gbps Base Product**"); and (b) 100 Megabits per second ("**Mbps**") Fast Ethernet ("**FE**") Residential Service ("**100 Mbps Product**");

1. The 1 Gbps GE Residential Service product (with symmetrical PIR of 1 Gbps, 20Mbps Class B downlink CIR and 25Mbps Class D downlink CIR) be introduced as the Residential Service base product under the ICO ("**Revised Residential Service**");
2. The current 1Gbps product (with 250Mbps CIR bandwidth) and 100 Mbps Product be removed as base service offerings under the ICO;
3. The options of (i) incremental 5Mbps CIR bandwidths; and (ii) lower bandwidth speeds of 150Mbps, 300Mbps and 500Mbps be removed from the Proposed 1Gbps Base Product; and
4. NC shall continue to honour all existing active connections under the 1Gbps product (with 250Mbps CIR bandwidth) as well as the 100Mbps Product at their existing prices, terms and conditions.

NC'S INITIATED CHANGES

1. Removing Class A and Class C bandwidths from the Residential Per End-User Connection service.

NC's Rationale: NC has not been receiving orders for Class A and Class C bandwidths for the Residential Per End-User Connection service for a number of years.

2. Removing the Express Service Activation Period ("**SAP**") feature from the following NC's services that utilise NetLink Trust ICO's Residential End-User Connection service (i.e., Schedule 1 of NetLink Trust's ICO):
 - (a) Residential Per End-User Connection;
 - (b) L2 VPN Service (Residential Service Port);
 - (c) E-LAN Service (Residential Service Port); and
 - (d) L3 VPN Service (Residential Service Port).

NC's Rationale: NC has not been receiving any Express SAP orders from the RSPs for a number of years. Where the RSP is able to submit an order via NC to NetLink Trust with an SAP of less than three business days, and where NetLink Trust is able to fulfil such an order, NC will likewise fulfil that order before the end of NC's standard SAP.

3. Removing the Express SAP feature from NC's following services that utilise NetLink Trust ICO's Non-Residential End-User Connection service (i.e., Schedule 2 of NetLink Trust's ICO):
 - (a) Non-Residential Per End-User Connection;
 - (b) L2 VPN Service (Non-Residential Service Port);
 - (c) E-LAN Service (Non-Residential Service Port); and
 - (d) L3 VPN Service (Non-Residential Service Port).

NC's Rationale: NC received only eight requests for Express Service Activation since the time it was first offered. Given the low take-up, NC proposes removing the offer from the ICO.

4. Removing the B2B Option in its entirety from the Platform Connection Service schedule.

NC's Rationale: NC received only one request for Platform Connection Service under the B2B Option since the start of its commercial operations in 2010. Given the low take-up, NC proposes removing the offer from the ICO.

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5. Removing the NRIC field in all paper application forms.

NC's Rationale: This removal would be in-line with the Personal Data Protection Commission's Advisory Guidelines on the collection of NRIC numbers. NC has also not been collecting NRIC numbers through NC's Platform since the start of commercial operations in 2010.