

IDA Reference: IDA.INTC.03.0304

21 February 2005

Singapore Telecommunications Ltd  
Attention: Mr Sean Slattery  
Director, Regulatory & Interconnect Strategy  
Fax no.: 6733 5597

Dear Sirs,

## REVIEW OF SINGTEL'S REFERENCE INTERCONNECTION OFFER ("RIO")

1. Please refer to the following documents:
  - a. the revised Code of Practice for Competition in the Provision of Telecommunication Services ("**Code 2005**"); and
  - b. the Schedule of Interconnection Related Services and Mandated Wholesale Services as notified under the Code of Practice for Competition in the Provision of Telecommunication Services (RIO Requirements) Notification 2005 ("**IRS Schedule**"),both of which will come into effect on 4 March 2005.
2. Under Sub-section 12.5.5 (b) of the Code 2005, Singapore Telecommunications Ltd ("**SingTel**") is required to submit to IDA for approval, within 30 days from the effective date of the Code 2005, SingTel's proposed modifications to the existing RIO to conform to the requirements of the Code 2005.
3. In this connection, SingTel must propose the following key modifications for inclusion into the RIO for IDA's review:

### General Amendments

- a. Ordering and provisioning processes for Interconnected Related Services ("**IRS**") and Mandated Wholesale Services ("**MWS**")

SingTel must review and propose modifications to streamline all ordering and provisioning processes currently contained in the RIO, for better expediency and greater efficiency. For example, where there are processes that are not necessary or are onerous, SingTel must consider eliminating such processes or reducing the associated timeframes.

b. Outdoor cabinets

IDA has lifted the exemption for SingTel to provide access to its outdoor cabinets. SingTel must therefore propose for inclusion into the RIO, the prices, terms and conditions for access to its outdoor cabinets.

c. Service level guarantees

For the purposes of Sub-sections 6.3.3.3 (a) and 6.3.3.3 (f) of the Code 2005, SingTel must propose for inclusion into the RIO, service level guarantees (“**SLG**”) providing for:

- i. the service quality, standards and timeframes for ordering and provisioning (including site preparation work, where applicable) and fault restoration; and
- ii. the manner and amount of compensation payable and other remedies available to a Requesting Licensee (“**RL**”) in the event that SingTel fails to meet such service quality, standards and/or timeframes,

in relation to, **at the minimum**, the following IRS:

1. Essential Support Facilities (Paragraph 5 of the IRS Schedule):
  - (a) Co-location
  - (b) Lead-in ducts and lead-in manholes
2. Unbundled Network Elements (Paragraph 6 of the IRS Schedule):
  - (a) Local loops
  - (b) Sub-loops
  - (c) Line sharing
3. Unbundled Network Services (Paragraph 7 of the IRS Schedule):
  - (a) Connection services at submarine cable landing stations

For the avoidance of doubt, the above list of IRS is not intended to be a comprehensive or exhaustive list of all the IRS for which SingTel must propose SLGs. To the extent that SLGs can be offered in relation to any other IRS/MWS, SingTel must propose SLGs for inclusion into the RIO for that IRS/MWS. To the extent that an existing SLG under the RIO can reasonably be improved upon in terms of assuring better

service quality, better standards, shorter timeframes, and/or more appropriate levels of compensation and remedies for the RL, SingTel must propose modifications to the existing SLG.

d. Insurance (currently under Clause 21 of the main Body of the RIO)

The RIO currently provides that the RL must obtain insurance for the amount of \$20 million (for FBOs) and \$1 million (for SBOs), irrespective of the type and quantity of IRS and MWS that the RL may have obtained under the RIO. IDA takes the view that the amount of insurance to be obtained by the RL must be proportionate to the level of SingTel's risk exposure and, in turn, this should be determined by the type and quantity of services obtained by the RL. Therefore, SingTel must review and propose modifications to the existing insurance requirement, such that the amount of insurance to be provided by the RL will vary according to the type and quantity of services obtained by the RL.

e. Dispute resolution (currently under Schedule 11 of the RIO)

SingTel must review and propose modifications to streamline the dispute resolution process currently contained in the RIO to enable disputes to be settled more expediently and efficiently. In particular, SingTel must consider eliminating the requirement for disputes to be referred to an inter-working group before such disputes can be referred to IDA, to mediation, or to arbitration. In addition, SingTel must also consider reducing the overall dispute resolution timeframes.

f. De-commissioning of specifically-located IRS/MWS

Consistent with the provisions of the Code 2005, IDA will not treat any request by SingTel to de-commission any specifically-located IRS/MWS or infrastructure being used to provide such IRS/MWS (as opposed to a class of IRS/MWS) as a request for exemption from the Code 2005 obligations. Instead, IDA will treat any such de-commissioning as an operational issue to be addressed between SingTel and the RL under the RIO. For example, if SingTel wants to de-commission its Jurong East Telephone Exchange, IDA will not require SingTel to file any request for exemption from the Code 2005 obligations. Instead, SingTel may de-commission such exchange in accordance with the provisions of the RIO. For the avoidance of doubt, if SingTel seeks an exemption from the obligation to offer an entire class of IRS/MWS (e.g., co-location in general), SingTel must apply for the appropriate exemption under the relevant provision of the Code 2005.

In this connection, SingTel must propose for inclusion into the RIO, **at the minimum**, the requirements set out below to address decommissioning in relation to the IRS currently under the following Schedules of the RIO:

i. Schedule 8 of the RIO

SingTel may only reject a request for co-location space at a co-location site, which has been earmarked for decommissioning, if such decommissioning will occur within a reasonable timeframe from the date of a RL's request. The RL must be given the flexibility to decide if it is feasible to obtain co-location for the remaining period prior to such applicable timeframe. In addition, SingTel should, within a reasonable timeframe of its decision to de-commission specifically-located IRS/MWS, propose corresponding modifications to the RIO (e.g., to amend the list of possible co-location sites set out in the RIO) for IDA's approval.

ii. Schedules 3, 5 and 7 of the RIO

SingTel may only reject a request for the IRS/MWS, which has been earmarked for decommissioning, if such decommissioning will occur within a reasonable timeframe from the date of a RL's request. SingTel must also include provisions obliging SingTel to notify the RL, upon receipt of the RL's request for such IRS/MWS, that the IRS used to provide such IRS/MWS is scheduled for de-commissioning and the scheduled de-commissioning date. The RL must be given the flexibility to decide if it is feasible to obtain the IRS/MWS for the remaining period prior to such applicable timeframe.

**IRS-specific Amendments**

g. Local loops and sub-loops (currently under Schedule 3A of the RIO)

i. For the purposes of Sub-section 6.3.3.3 (g) of the Code 2005, SingTel must ensure that sufficient information (e.g., information relating to SingTel's exchange locations such as maps showing each exchange's boundaries, the expected decommissioning dates for exchanges that are earmarked for decommissioning, and the extent of availability of copper loops at each exchange) must be provided to RLs for the purpose of application and lease of local loops and sub-loops. In this regard, SingTel must, **at a minimum**, propose for inclusion into the RIO the processes and application forms as discussed in the correspondences between SingTel and IDA dated 26 August 2004, 17 September 2004, 28 October 2004 and 10 November 2004.

ii. IDA is of the view that the current reservation period for local loops and sub-loops of 2 years is too long. SingTel must propose a more reasonable and relevant reservation period.

- iii. For the purposes of Paragraph 6.6.4 of the IRS Schedule, SingTel must propose modifications to the RIO to reflect, among others, the requirement that where the RL plans to use the local loop to provide DSL-type services, SingTel must provide local loops that perform at a level equivalent to the local loops that SingTel uses for its own DSL services. In addition, SingTel must propose for inclusion into the RIO a minimum set of specifications for the local loop it will provide.
- iv. Under the IRS Schedule, SingTel is no longer obliged to offer to construct additional local loops if none are available. SingTel should therefore propose modifications to remove the relevant provisions from the RIO.

h. Line-sharing (currently under Schedule 3B of the existing RIO)

For the purposes Paragraph 6.8.1 of the IRS Schedule, SingTel must propose modifications to the RIO to reflect, among others, the requirement that the quality of the loop provided for line sharing must be equivalent to that provided for local loops or sub-loops under Paragraph 6.6.4 of the IRS Schedule. In addition, SingTel must review and propose modifications to the spectrum plan currently contained in the RIO to allow for other xDSL services.

i. Distribution frame access (currently under Schedule 3D of the RIO)

IDA is of the view that the current reservation period for MDF distribution frames of 2 years is too long. SingTel must propose a more reasonable and relevant reservation period.

j. Lead-in ducts and associated lead-in manholes (currently under Schedule 5A of the RIO)

IDA is of the view that the reservation period for lead-in ducts and associated manhole of 2 years is too long. SingTel must propose a more reasonable and relevant reservation period.

k. Tower space and co-location space at tower sites (currently under Schedule 5B of the RIO)

IDA is of the view that the reservation period for tower space and co-location space at tower sites of 2 years is too long. SingTel must propose a more reasonable and relevant reservation period.

l. Co-location space (currently under Schedules 8A, 8B, 8C and 8D of the RIO)

- i. IDA is of the view that the reservation period for co-location space of 2 years is too long. SingTel must propose a more reasonable and relevant reservation period.

- ii. For the purposes of Paragraph 5.2(a) (iii) of the IRS Schedule, SingTel must propose modifications to the RIO to specify the situations in which virtual (distant) co-location will be required.
  - iii. For the purposes of Paragraph 5.3.1 of the IRS Schedule, SingTel must propose for inclusion into the RIO the terms and conditions for co-location at roof spaces.
  - iv. Under the IRS Schedule, SingTel is no longer obliged to offer co-location at satellite earth stations. SingTel should therefore propose modifications to remove Schedule 8C of the existing RIO.
4. For the avoidance of doubt, the above list of key modifications is not intended to be a comprehensive or exhaustive list of all the modifications that SingTel must incorporate into the RIO. To the extent that other modifications are required to be made to the RIO in order for the RIO to fully comply with the requirements of the revised Code, SingTel must propose such modifications for IDA's review. In addition, arising from the industry consultation on SingTel's proposed modifications to the RIO or where necessary, IDA may direct SingTel to incorporate further modifications.
5. Please also be informed that once IDA approves SingTel's proposed modifications to the RIO, IDA will also proceed to publish the applicable prices for all the IRS and MWS by making available on IDA's website the applicable price schedule of the RIO.
6. Finally, in accordance with section 12.5.5 of the Code 2005, SingTel must submit its proposed modifications to the RIO on **4 April 2005 at 5 pm**.
7. Please note that requests for IDA's clarification of the above should be made in writing to the attention of the undersigned, and sent by facsimile to 6211 2116.

Yours sincerely,

Andrew Haire  
Senior Director (Policy & Competition Development)