

COPIF Consultation – Feedback/Comments

Section / Proposal	IMDA Proposed Change	Comments
Section – 1: Future-ready mobile network infrastructure		
A – MIS in New Developments	Pre-identify Mobile Installation Space (MIS) during design phase with early Building Owner (BO) – Mobile Network Operators (MNO) engagement	<ul style="list-style-type: none"> - Yes, it is useful for MIS to be identified upfront during the development design phase, subject to the Energy Market Authority (“EMA”) approval. The security of vital installations should also be taken into consideration. - Ideally MIS should not be located within a protected place, at the very least, any such installation should require approval from EMA as the regulator, given that access to the power plant is strictly controlled. - Senoko can make space available if required. However, any actual installation should only be carried out based on Senoko’s operational need for improved mobile coverage within its premises. - The telecom operators should not have the automatic right to access the site or install antennas unless specifically to provide coverage to Senoko, particularly since the site is designated as a protected place. They should also not be permitted to establish a mobile base station within Senoko for the purpose of serving neighbouring factories.
B – Telecom in Basement Carparks	Require telecom risers & cable trays to Basement 1	<ul style="list-style-type: none"> - Telecom cables should be installed in cable trays separated from the building’s lighting and power trays. Also, there may be a need to consider

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		<p>allowing BOs to recover associated costs from the MNO.</p>
C – Lamp post Deployments	<p>Allow mobile deployment on lampposts with no rental charge</p>	<ul style="list-style-type: none"> - All lamp posts within protected areas are not to be subject to such deployments.
D(i) – Relocation of Equipment	<p>MNO bears relocation cost when BO requires relocation</p>	<ul style="list-style-type: none"> - We are supportive of the propose change as new Projects / Plant modifications may trigger relocations. - Propose 3 months for reasonable lead time for any notice to be served by the BO to an MNO prior to any proposed temporary or permanent relocation. <ul style="list-style-type: none"> o Reference Question: <ul style="list-style-type: none"> ▪ 4(iii) – MNO to bear full relocation cost. ▪ Reference Question 5 (I, ii & iii) – Yes, especially when full escort service is required in lieu of Health, Security, Safety & Environment (HSSE) concerns especially for new contractors who may not be familiar with the site. Also, for Special Infrastructure (SI) sites like ours, the admission of MNO personnel (including their contractors) is subject to security clearances from sector lead (in our case, from EMA)

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		and appropriate lead time is required to facilitate entry.
D(ii) – Rooftop Access Charges	Allow BO to recover access, escort, and admin costs	- Supportive of cost recovery. All access is subject to EMA approval.
D(iii) – Sample MIS Agreement	Provide standard agreement template	Supportive of a template that can be adapted by the parties and for further safety and security provisions for critical infrastructure to be added.
D(iv) – Change of BO / Expiry	Automatic continuation of MIS after ownership changes or agreement expiry	MIS should not continue indefinitely as it might prejudice the BOs. There should be provisions for an interim period.
D(v) – PE Structural Certification	Require Professional Engineer certification for installations	- MNO to bear the full cost of such recertification
Section – 2: Future-proof fixed line infrastructure		
E – Cabling >10Gbps	Upgrade to Cat 7/8 for higher speeds	- Not applicable to Senoko (Clause refers to new residential development only)
F – Reduced Requirements (Small Single-User Buildings)	Reduce telecom facilities for small single-user developments	- Not applicable to Senoko, since we are >2000 sqm
G – Advance LIP Deployment	Licensees build and transfer Lead-in Pipes (LIPs)	- Agree but BO pay only for the capacity it uses.

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H – Resilience for SD/SI Buildings	Extend redundancy requirements to Special Development/Infrastructure	<ul style="list-style-type: none"> - Reference Question 12(i) – As such buildings come under the Infrastructure Protection Act (IPA), Telecommunication Space and Facilities obligations imposed on buildings should be left to such BOs as any new building design are subjected to strenuous Security by Design (SBD) requirements which may have overarching considerations best left to BOs.