

Feedback on COPIF Consultation Paper

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Name

Elinor Ng

Association / Organisation

Singapore Institute of Technology

Section 1: Future-ready mobile network infrastructure

A. Provision of Mobile Installation Space ("MIS") in new developments

Question (1)(i) Any views on the obligations to be imposed on BOs and MNOs to facilitate this process of pre-identifying a suitable location for mobile deployment?

Question (1)(ii) Whether it is useful for MIS to be identified upfront during the development design phase, and if so, an appropriate engagement process between BOs and MNOs, such as leveraging on the Corenet, similar to the process where the Telecommunication Facility Co-ordination Committee engages the developers/BOs?

Question (1)(iii) The appropriate period/timeframe for MNOs to be granted access to carry out their installations without disrupting the TOP schedule (e.g., X months prior to TOP Date).

Pre-identifying the MIS location during the design stage is generally not practical. While a provisional space is typically allocated and submitted for TFCC clearance, this location often proves unfeasible during subsequent site surveys by MNOs, as the approved space may not meet telco signal requirements. Greater flexibility is therefore needed, with final positioning to be validated based on actual site conditions and signal performance.

Although BOs typically engage MNOs 6–9 months prior to TOP, MNOs often cite safety concerns due to ongoing construction works and PPE requirements. This should not be a limiting factor, as contractors are present on-site and coordination can be carried out during the construction stage. Early coordination would enable proper routing and provision of cable containment infrastructure. This avoids situations where installations occur only after residents move in, resulting in exposed and aesthetically unsightly cabling.

B. Provision of telecom infrastructure in basement car parks in new buildings

Question (2)(i) Whether it is sufficient for BOs to provision telecommunication risers, and cable trays alongside electrical cable trays in the B1 carpark, and if there are other types of ancillary infrastructure required to be provisioned upfront to facilitate MNOs' B1 carpark deployments?

Such provisions would be more effective if MNOs can confirm antenna locations relative to the MIS early on. Cable containment can then be purposefully installed between these points, rather than providing generic cable trays that may ultimately be redundant.

Question (2)(ii) Whether it is beneficial for telecommunication risers and telecommunication cable trays to be extended below B1 for future provisioning?

It would be beneficial to extend cable trays to key areas such as EV lots, lift lobbies, and carpark egress points, where mobile reception is typically required. This would facilitate future deployment of indoor antenna systems.

C. Enable street-level mobile connectivity using street lampposts

Question (3)(i) The corresponding land take (i.e., space) required for each street lamppost deployment.

Question (3)(ii) Feasible solution(s) to address safety and aesthetic concerns for such lamppost deployments.

Cabling works should be coordinated upfront so that cables can be concealed within lamppost structures rather than externally mounted. This improves both safety and visual aesthetics.

D. Enhance clarity on requirements under COPIF to facilitate faster mobile deployments into buildings

Question (4)(i) A reasonable lead time for a notice to be served by the BO to an MNO prior to any proposed temporary or permanent relocation.

The required lead time should take into account MNO response timelines. For example, if MNOs require two months to act, a minimum notice period of approximately three months would be reasonable.

Question (4)(ii) The information to be provided by a BO in order for MNOs to assess and facilitate any proposed temporary or permanent relocation.

While BOs may propose alternative unused spaces, their suitability for MNO deployment is not guaranteed. A joint site survey between the BO and MNO should be conducted to confirm feasibility before finalizing relocation.

Question (4)(iii) The cost responsibility between a BO and an MNO for such temporary or permanent relocation.

If the relocation is initiated by the BO, the associated costs should be borne by the BO.

D. Enhance clarity on requirements under COPIF to facilitate faster mobile deployments into buildings

Question (5)(i) Should BO be allowed to recover such access charges from MNOs for each instance of rooftop access requested by an MNO?

MNOs should comply with the BO's internal safety and access requirements when carrying out rooftop works.

Question (5)(ii) Should the access charges be different for buildings with and without security guards on site?

Question (5)(iii) Should access charges be determined and set by IMDA? What would the appropriate benchmark for IMDA to adopt?

Some BOs may require a refundable deposit for access. This deposit should be returned upon completion of works, provided no damage is caused to the building. A standardized framework could help ensure consistency.

D. Enhance clarity on requirements under COPIF to facilitate faster mobile deployments into buildings

Question (6)(i) Whether it is useful for IMDA provide a sample agreement and if so, what terms and conditions should be included in the agreement?

Yes, it would be useful for IMDA to provide a standard template agreement. While some developers already have their own templates, a baseline reference would help ensure alignment across the industry.

D. Enhance clarity on requirements under COPIF to facilitate faster mobile deployments into buildings

Question (7)(i) Whether there will be impact or prejudice to the (existing or new) BOs and MNOs in the two scenarios described above?

Question (7)(ii) Whether there is a need for an expiry date for the MIS Agreement?

D. Enhance clarity on requirements under COPIF to facilitate faster mobile deployments into buildings

Question (8)(i) The proposal for a PE to be engaged for such mobile deployments.

An alternative approach would be to define equipment load requirements within COPIF. This would allow the building's structural PE to account for such loads during the design stage, reducing the need for separate PE engagement later.

Section 2: Future-proof fixed line infrastructure

E. Upgrade of in-building cabling to support fixed-line broadband speed beyond 10Gbps

Question (9)(i) The appropriate cabling standard that has the capability to support broadband speed of 10Gbps and beyond and the reasons for the choice of the proposed cabling standard.

Digital infrastructure planning should be forward-looking. Instead of specifying current standards, COPIF should consider requiring higher-category cables (e.g., future CAT standards) or fibre optic solutions to support long-term scalability.

F. Reduced telecommunication Space and Facilities to allow optimisation of space in single-user buildings

Question (10)(i) The proposal to remove and/or reduce the telecommunication Space and Facilities for small single-user non-residential development as described above.

Single-user developments typically engage no more than two telcos. Accordingly, the number of lead-in pipes and cable trays can be reduced, and MDF rooms may be replaced with simpler riser / closet solutions.

Question (10)(ii) Any feedback on the current required telecommunication Space and Facilities, such as the MDF room sizes, for the different types of developments?

MDF rooms are often underutilized and their sizes could be reduced. For multi-block developments, TER rooms need not be provided in every block; instead, they can be shared across several blocks, as many existing TER rooms are not fully utilized.

G. Minimise public disruption with advance laying of Lead-In Pipes (“LIPs”)

Question (11)(i) The approach for construction and interim ownership of LIPs, and the transfer arrangements of the LIPs from Licensee(s) to developer or BO once the latter has been identified.

While the proposal is well-intentioned, its practicality depends heavily on development specific design factors such as MDF location, routing, and levels. Additionally, external constraints (e.g., NParks requirements for minimum burial depth of 2m under planting areas) may render pre-installed LIPs unusable, resulting in redundancy and the need for new installations.

H. Enhance resilience and diversity of buildings providing critical services

Question (12)(i) The proposal for the same Telecommunication Space and Facilities obligations imposed on buildings providing vital services to be extended to those buildings designated as SD/SI.

Yes, this is reasonable. Providing redundancy in the number of LIPs would enhance resilience for such developments.

I. Others

Question (13)(i) Other potential changes to enable our telecommunications infrastructure to be future-ready to support Singapore’s digital economy