

Ms Aileen Chia
Director-General (Telecoms and Post)
Deputy Chief Executive (Connectivity Development & Regulation)
Infocomm Media Development Authority
10 Pasir Panjang Road
#03-01 Mapletree Business City
Singapore 117438

9 Sep 2025

Dear Ms Chia,

RE: Consultation Paper Issued by IMDA on Singtel's RIO for IP-based Interconnection for Voice Services dated 28 Jul 2025

Symbio Networks Singapore Pte Ltd, a licensed FBO and being an interested party in the implementation of IP-based interconnection for voice services with Singtel, would like to share our comments as below. Establishing an IP-based interconnection for voice services has always been top of agenda for Symbio since 2021. Such a setup would bring about more efficient use of resources and allows carriers to provide new and innovative services to our customers. For example, Symbio recently released MoLi code via SIP X header in Australia which provides those businesses with tollfree numbers, greater insights on the location of a caller to appropriately steer their call to a local branch and personalise their experience. We also believe that with full IP-based interconnection, we can improve the time and capacity involved in porting of numbers, further improving competition and choice to end users, including the ability to speed up the time and increase the volume for fixed number porting. To date, Symbio has established IP-based interconnection with M1, MyRepublic, Simba and Verizon. What is outstanding is to complete the loop by establishing IP-based interconnection for voice services with StarHub and Singtel.

Symbio is supportive of this move toward IP-based interconnection for voice services. There are a few remarks in Singtel's preliminary RIO offer shown in the attached document. Below are a few particular points Symbio would like to highlight.

In relation to Schedules 2A, 2B and 2C regarding the charging principles for Call Origination, Call Termination and Call Transit, the arrangements should be applied to Series 3, Series 6, Series 8, Series 9 and other Series numbers that may be introduced in future. This includes the process

for adding new number ranges for all these call types. Moving to IP-based interconnection, it makes practical sense for all FBOs to make use of the same data link to convey all call types.

On the implementation of Bill-and-Keep (“BAK”) regime for fixed call termination to come into effect once IP-based interconnection is fully implemented in Singapore, Symbio would like IMDA to reconsider this position. In other countries such as Australia and New Zealand, there has been a deliberate move away from Bill-and-Keep settlement models as without financial disincentives there can be an increase in spam/telemarketing style traffic. Although the model simplifies inter-carrier billing, reduces disputes and encourages unlimited and flat rate retail plans, it favours dominant telcos and is disadvantageous to smaller operators that rely on termination revenue for cost recovery i.e. it favours operators that make more calls than they receive.

Finally, it is heartening to note that IMDA will also be conducting a review of the prices of RIO services after Singtel has completed the setting up of its IP-based network. It is an opportune time as the move to an IP-based interconnection should make operating the network more efficient, thereby reducing some of the overheads of operating such a network.

Please see our additional comments to some of the specific comments on Singtel’s proposed preliminary RIO offer attached as a XLSX file.

Thank you.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Yeo See Kiat', with a long horizontal stroke extending to the right.

Yeo See Kiat
CEO
Symbio Networks Singapore Pte Ltd