

**M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON  
REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S  
REFERENCE INTERCONNECTION OFFER**

**5 May, 2005**

This paper is prepared in response to IDA's consultation document dated 5 Apr 2005 and represents M1's views on the subject matter. Unless otherwise noted, M1 makes no representation or warranty, expressed or implied, as to the accuracy of the information and data contained in this paper nor the suitability of the said information or data for any particular purpose otherwise than as stated above. M1 or any party associated with this paper or its content assumes no liability for any loss or damage resulting from the use or misuse of any information contained herein or any errors or omissions and shall not be held responsible for the validity of the information contained in any reference noted herein nor the misuse of information nor any adverse effects from use of any stated materials presented herein or the reliance thereon.

## **M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON REVIEW OF SINGAPORE TELECOMMUNICATIONS LIMITED'S REFERENCE INTERCONNECTION OFFER**

- 1 M1 welcomes the opportunity to submit our views and comments to IDA for its consideration in its review of Singapore Telecommunications Limited's (SingTel) Reference Interconnection Offer (RIO).
- 2 M1 has been providing cellular mobile services to the Singapore market since 1 April 1997 and in August 2000, we launched our international telephone services. In April 2001, we obtained the FBO Licence for the Provision of 3G Mobile Communication System and Services and the 3G Spectrum Right. M1 took the lead in introducing 3rd Generation (3G) technology and launching our 3G services in February 2005.
- 3 The implementation of the RIO has helped to facilitate interconnection between SingTel and telecom licensees in a fair manner and reduce potential difficulties and timeframe required in negotiating interconnection. While the current RIO has achieved its main objectives, M1 has the following comments:-

### **Schedule 2 (Origination, Termination and Transit (O/T/T) of the Proposed RIO documents**

#### Clause 1.4

- 4 M1 notes that SingTel has introduced a new clause 1.4 to state that the Acquirer is responsible for the provision and maintenance of Interconnect Links. We would like to highlight that as the other end of the interconnect link is located at SingTel's premise, SingTel should not absolve itself of the responsibility for maintenance of the interconnect link. Therefore, Clause 1.4 should be amended accordingly to reflect that it is a joint responsibility of the interconnecting parties.

#### Clause 4.2

- 5 Under Clause 4.2, SingTel stated that bulk metering is no longer used for Inter-operator billing at SingTel's Interconnect Gateway Switches. If so, we would request that SingTel furnish its charging record format to operators to facilitate billing verification by operators in case of disputes.
- 6 In addition to the above, M1's confidential submission can be found in Annex 1.