



M1 Limited

16 September 2025

Director-General (Telecoms & Post)
Info-Communications Media Development Authority of Singapore
10 Pasir Panjang Road
#03-01 Mapletree Business City
Singapore 117438
Attention: Mr Ong Tong San

By Email: ILO@imda.gov.sg

Dear Mr Ong,

**CONSULTATION PAPER ISSUED BY THE INFOCOMM MEDIA DEVELOPMENT
AUTHORITY ON SINGAPORE TELECOMMUNICATIONS LIMITED'S (ST)
REFERENCE INTERCONNECTION OFFER (RIO) FOR IP-BASED
INTERCONNECTION FOR VOICE SERVICES**

1. We refer to the above consultation paper issued on 28 July 2025.
2. M1 welcomes the opportunity to review and provide our comments on the above consultation.
3. Given that the policy goal of migrating the industry from Signalling System No. 7 to IP-based signalling was first raised in 2019, the consultation comes at a timely juncture. The proposed RIO by Singtel, the dominant licensee, is a key step towards implementing full IP-based interconnection in Singapore.
4. We set out 4 key principles below which we believe are fundamentally critical in establishing a fair RIO that reflects the current market dynamics in the Singapore market.

(I) IP-based interconnection cannot be purely commercially driven

5. The implementation of IP-based interconnection carries tangible benefits for end users and the industry. These include better voice call quality, as well as enhanced operational efficiencies for voice traffic, leading to cost savings for operators. In a climate with tough operating conditions, such cost savings allow operators to invest in new technologies and better services.
6. In reviewing the terms of the proposed RIO, these policy outcomes should be the main consideration, and the terms of interconnection cannot be purely commercially driven.



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(II) Terms of RIO should not be unfairly advantageous to the dominant licensee

7. The implementation of IP-based interconnection is relatively new, with no single licensee (including ST) in the industry having a technical advantage or expertise over another licensee. The responsibilities for successful implementation of IP-based interconnection lie equally on both ST and the requesting licensees.

8. As such, pricing terms (e.g. costs of setting up, testing and maintenance), as well as liability clauses, should reasonably be mutualised as far as possible.

(III) Point of interconnection (POI) for ST and the requesting licensees

9. Under the proposed RIO, ST has mandated that the interconnection to its network be via the Paya Lebar and Jurong East telephone exchanges, with the location of the POI within Singtel's premise.

10. In the current interconnection regime, operators can determine their own POI and IMDA would allow operators to mutually agree on the interconnect configurations that best fit their network deployments. Such arrangements for alternative POI are provided for in the current version of the RIO and must be preserved in the proposed RIO.

11. This would allow for points of interconnection at neutral data centres where many operators have already established interconnection links, which could lead to significant cost savings. Nevertheless, if ST maintains its proposed POI at the Paya Lebar and Jurong East exchanges, interconnecting licensees must be allowed to determine the location of their side of the POI.

(IV) Nature of technology for IP-based interconnection is different

12. IP-based interconnection utilises a different technology from that of time division multiplexing. Accordingly, certain terms in the RIO (e.g. calculation of call charges) must be amended to reflect this difference.

13. We submit that ST's proposed RIO should be reviewed and revised accordingly to reflect the principles above, which are not fully present in the current proposal.

Yours sincerely,

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Mr Alvin Voon
General Manager
Regulatory