

Feedback on COPIF Consultation Paper

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Time Submitted

Mon, 18 May 2026, 04:31:15 PM

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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).

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?

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

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.

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.

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.

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

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?

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?

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?

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.

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.

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.

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?

CAG supports right-sizing of telecom facilities in landscape Singapore. The utilisation of MDF rooms within Changi Airport terminals and Changi Jewel are all below what is mandated by COPIF. As the industry has transitioned away from legacy copper/coaxial technologies towards other technologies like fibre and mobile-centric connectivity, the under-utilisation of space in MDF rooms is significant, especially for newer facilities.



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.

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.

I. Others

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