

## SUBMISSION OF COMMENTS

### PUBLIC CONSULTATION ON THE REVIEW OF THE CODE OF PRACTICE FOR INFO-COMMUNICATION FACILITIES IN BUILDINGS ("COPIF")

**Organisation:** SP Group

**Address:** 2 Kallang Sector, SP Group Building, Singapore 349277

**Email:** RM-NewReg@sppower.onmicrosoft.com

S/N	Paragraphs	Comments
18	<p>Where the BO reasonably requires the MNOs to relocate from the current MIS to another location within the same development be it temporarily or permanently, IMDA proposes that:</p> <p>a) The BO provides all relevant information regarding its plans (e.g., building drawing plans) to the MNOs to study and plan for the relocation to another suitable MIS location within the development;</p> <p>b) The BO to provide the alternate MIS for the relocation, where feasible; and</p> <p>c) Cost of the MNO relocating its equipment shall be borne by MNOs, and the BOs will bear the costs for reinstating the space to its original condition or other purposes that the BO wishes to.</p>	<p>SP proposes that a reasonable lead time for notice to be served by BOs for the relocation of MNOs' equipment is 3 months. Based on our experience, MNOs have been able to work within this timeline. Where necessary, a longer notice period may be considered, subject to mutual agreement between the BOs and the MNOs.</p> <p>SP further proposes that the cost of reinstating the space to its original condition should be borne by the MNOs. Given that such space is already provided on a rent-free basis, BOs should not be made to suffer further losses from reinstatement if such relocation request is reasonably required. It would be unfair for costs arising from this activity to be borne by electricity consumers (given that SP's substation facilities belong to the regulated business).</p>
22	<p>IMDA proposes to allow BOs to recover costs of administering rooftop access to MNOs, including security and escort charges related to such rooftop access. To ensure that such charges are reasonable, IMDA is considering setting a rate on such charge</p>	<p>SP supports the recovery of such access charges from MNOs. It would be unfair for costs arising from this activity to be borne by electricity consumers (given that SP's substation facilities belong to the regulated business). The benchmarked access rates should, at a</p>

S/N	Paragraphs	Comments
	based on industry benchmarks, for example, regulated rates in Licensees' offers for access to telecom exchanges or central offices.	minimum, fully reflect the actual costs (e.g. manpower, equipment, security checks etc) and administrative efforts incurred in facilitating and managing such access. Such access should be coordinated in advance to ensure the BO's security and operational needs are not compromised.
29	Hence, IMDA proposes that MNOs engage a PE at MNOs' own expense to certify their proposed mobile deployments are structurally safe prior to carrying out any works. MNOs are to submit a copy of the PE endorsement to the BOs for reference.	SP agrees with the need for mobile network operators to engage a professional engineer (PE). SP proposes that in addition to safety assessment, the review should include potential damage to the building (e.g. rooftop weatherproofing) as such damages could potentially lead to structural integrity issues.