



25<sup>th</sup> August, 2025

Voxbone (Singapore branch)<sup>1</sup> appreciates the opportunity to provide feedback on IMDA's initiatives concerning Singtel's regulated All-IP interconnection. Ensuring fair, transparent, and non-discriminatory interconnection is paramount for fostering a competitive multi-operator environment, particularly amidst the transition to an All-IP ecosystem.

Despite our attempts to engage Singtel regarding our interconnection requirements to an all IP-interconnection (All-IP), progress has been lacking. Therefore, we offer overarching observations on the proposed All-IP RIO, anticipating Singtel's adherence to established ITU and industry wide technical & operational standards. Any deviations from ITU recommendations or industry standards should be promptly communicated by Singtel to IMDA and relevant operators.

We note with concern Singtel's stated intention to prioritize SS7 interconnections during the All-IP transition, scheduled to commence in early 2026. Bandwidth, currently utilizing TDM interconnection, has for several years sought to migrate to All-IP, yet clear timelines and commitments from Singtel remain absent.

As a consequence of the current impasse, we urge IMDA to mandate Singtel to engage with all market participants on a technologically neutral basis thereby ensuring equitable prioritization and non-discriminatory treatment for all Singaporean operators concerning interconnection. Migration to All-IP should strictly follow the order of request submission. Singtel's proposed prioritization risks market foreclosure and reinforces its dominant position. Unless IMDA's mandates equal treatment by Singtel, there is a real risk this will reduce the ability of SBO operators to compete in a market already dominated by FBO operators. It would be highly undesirable to add to SBO operators' inability to compete (unable to acquire level 6 numbers) with FBO operators, who can acquire both Level 3 and 6. Such delays or lack of prioritization also diminish network effects, rendering smaller networks less appealing and ultimately restricting consumer choice.

We fully endorse industry efforts and IMDA's desire to combat fraud ("prompt implementation of IP-based interconnection in Singapore is important to support IP-based solutions to combat scam calls"). However, we are of the opinion that IMDA should not set aside the fundamental objectives of interconnection and firmly believe IMDA's and Singtel's primary focus for All-IP interconnection must remain on interoperability and cultivating a fair, competitive market. Diverging from these

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<sup>1</sup> Owned by Voxbone SA and now part of Bandwidth Inc



fundamental objectives, even for a commendable cause, will compromise interoperability, competitiveness, and end-user benefits.

To achieve fundamental interconnection objectives, charges must be cost-oriented, ideally predicated on forward-looking long-run incremental cost (LRIC), as recommended by the ITU. This prevents dominant operators from imposing excessive fees that impede market entry and ensures equitable, transparent rates. For innovative smaller operators, interconnection costs represent a significant barrier and without verifiable LRIC derivation, these costs pose a substantial impediment to sustainable market participation as well as injecting regulatory and business uncertainty.

We find no reference or evidence in the consultation or RIO indicating that Schedule 9 - Charges - are LRIC-based. As a participant in the Singaporean market, our business relies on competition-neutral interconnection pricing. We therefore recommend to clarify that charges are derived from an IMDA-supervised LRIC model, ensuring Singtel cannot impose excessive charges that distort market competition.

Finally, the "Per Interconnection Link" cost item lacks any indication of its derivation, constituent components, or methodology, merely stating "on a case-by-case basis." Further elucidation on cost derivation is essential to mitigate regulatory and business uncertainty.

In conclusion, while Bandwidth commends Singtel's progress towards All-IP interconnection, we urge IMDA to ensure that the forthcoming rollout of All-IP interconnection genuinely fulfils the fundamental objectives of interconnection, thereby establishing an interoperable and competitive Singaporean market for all license categories and business models.

We remain at IMDAs disposal for any further clarifications or views in relation to matters raised in this submission,