

Feedback on COPIF Consultation Paper

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Association / Organisation

BELMACS Pte Ltd

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?

Historical feedback from MNOs suggests that signal performance cannot be accurately evaluated until site construction is completed. However, HDB projects consistently pre-identify MIS space prior to the tender stage. We would like to explore the feasibility of adopting a similar methodology for private sector projects to ensure better spatial coordination during the design phase. In alignment with BCA's push for digitalization across the built environment, can MNOs explore utilizing 3D models for signal simulation to facilitate the possibility of conducting preliminary assessments of coverage and equipment placement?

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?

Generally, the proposed MIS space is indicated during the design and TFCC submission stages. However, once the MNOs are onboarded, they often find the proposed locations unfeasible. This results in the MNOs proposing new locations, which necessitates the relocation of all base provisions

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).

While BOs typically engage MNOs 6–9 months prior to TOP, MNOs often cite safety concerns regarding ongoing construction and PPE requirements. These concerns are not a limiting factor, as contractors remain on-site to facilitate coordination during the construction stage. Early coordination enables the proper routing and provision of cable containment infrastructure. This prevents installations from occurring after residents move in, which often results in exposed, unsightly cabling and avoids redundant double-handling of ceiling works. Is there a mandatory deadline for MNOs to ensure mobile signal coverage for new buildings?

B. Provision of telecom infrastructure in basement carparks 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?

Where a Telecommunication Equipment Room (TER) is provided for each block and situated in the basement, we propose installing a cable tray extending from the TER to the EV charging station area. A coverage radius of approximately 40m aligns with existing TEL riser requirements. For projects without an MDF or TER at the basement level, extending the TER riser to Basement 1 is a viable alternative.

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.

Internal unit cabling using Cat 6 does not suffer from significant signal drops given the limited distances involved. Transitioning to Cat 7 is not ideal, as the required proprietary Cat 7 jacks limit hardware flexibility. A more effective approach is for IMDA to encourage the use of Cat 6A. This standard provides better support for PoE applications and ensures long-term technical feasibility without the constraints of proprietary equipment.

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.

This is a constructive suggestion that will assist the industry in reducing unnecessary paperwork and improving the efficiency of telecommunication facilities.

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?

We would like to highlight that HDB, as Singapore's largest developer, permits a single Telecommunication Equipment Room (TER) to be shared among up to three blocks per their design brief. We seek clarification on whether IMDA intends to standardize these requirements across both public and private developments to optimize telecommunication facility efficiency. Currently, MDF and TER space provisions remain oversized, as they continue to follow legacy guidelines that include copper patch panels and SCV infrastructure—technologies no longer adopted in new buildings. Given Singapore's land scarcity, IMDA could review and improve the spatial efficiency of telecommunication facilities. Additionally, rather than determining TEL riser sizes solely based on total unit count, we propose that IMDA consider sizing based on typical floor unit density to more accurately reflect infrastructure needs. We propose a review of the mandatory data point requirements for kitchens and living rooms. As kitchen smart appliances rely primarily on Wi-Fi rather than physical ports, the current requirement for hardwired points has become a 'white elephant'—an underutilized provision. Furthermore, the adoption of PPVC construction often limits the feasibility of installing data points in specific structural walls. With the shift toward open-concept layouts, we request that IMDA optimizes these requirements to align with modern construction methods. Specifically, for open-concept designs where living and dining areas are combined, we propose that the requirement be consolidated to a total of two data points for the shared space. This approach ensures the layout is more user friendly and avoids the technical constraints posed by PPVC modules. We recommend that IMDA considers the formal inclusion of MATV (Master Antenna Television) systems within the COPIF. This recommendation is based on the following practical considerations:

- Superior Signal Reliability: MATV systems offer significantly better performance than the current provision of window-unit-type antennas. In many developments, window units suffer from poor signal reception due to specific building orientations or locations. Integrating MATV into the COPIF ensures consistent, high-quality reception for all residents.
- Alignment with Industry Standards: MATV systems are

Alignment with Industry Standards: MATV systems are already commonly adopted as a standard feature in most private residential developments. Formally gazetting this system would align regulatory requirements with established industry practices.

- Administrative Efficiency: Officially recognizing MATV systems would streamline project timelines by eliminating the necessity for the waiver application process. This would reduce administrative overhead for both the Authority and developers, providing greater regulatory certainty and ensuring that compliance requirements are clearly defined from the outset. We would like to seek clarification regarding the "temporary" status currently applied to waiver approvals for MDF rooms located in basements. While we appreciate the flexibility provided by the waiver process, the current terminology presents significant practical challenges for the industry.
- Permanence of Infrastructure: Given the nature of structural construction, once a building is completed and has obtained its Temporary Occupation Permit (TOP), it is not feasible to alter or relocate the MDF room. Relocation would have a major impact on URA GFA requirements, as allowable GFA for most developments is typically fully utilized. Furthermore, moving an MDF room significantly compromises the building's functionality and aesthetics, and necessitates the extensive relaying of cables. Consequently, the "temporary" status creates a mismatch between regulatory language and physical reality.
- Legal and Audit Implications: The term "temporary approval" frequently triggers extensive queries from developers, legal counsel, and auditors. This places industry practitioners in the difficult position of interpreting the Authority's long-term intent --an area beyond our remit -- and necessitates answering on behalf of the Authority eg: URA.
- Request for Definitive Guidance: To ensure regulatory certainty, we respectfully suggest that when a waiver is deemed acceptable, IMDA issues a clear and definitive approval in its capacity as the governing authority. If a basement location is not supported, we suggest that a specific construction direction be issued instead. This adjustment would provide the necessary finality for project stakeholders, reduce administrative ambiguity, and ensure that compliance requirements are clearly defined from the outset.

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