Title	NetLink Trust's Contravention of IMDA's Direction – Failure to implement the revised Operations Support Systems/ Business Support Systems ("**OSS/BSS**") by the original deadline of 30 September 2016
Date of IMDA's Decision	22 July 2019
Licensee	NetLink Management Pte Ltd (as Trustee-Manager of the NetLink Trust)
Case Summary	In 2013, as one of the conditions of approval for the proposed consolidation between CityNet Infrastructure Management Pte Ltd and OpenNet Pte Ltd ("**OpenNet**") ("**Consolidation**"), IMDA required the applicants to the Consolidation to submit a detailed implementation plan on the transfer of OpenNet's business, assets and relevant personnel to NetLink Trust ("**NLT**") ("**Implementation Plan**"). IMDA approved the Implementation Plan, which included the implementation of a replacement OSS/BSS ("**Replacement OSS/BSS**") by 30 September 2016. This was to ensure that NLT would be independent from any telecommunication and/or broadcasting licensees ("**Independence Requirement**"), as NLT was then relying on Singtel's OSS/BSS. In May 2018, NLT sought relief from the Replacement OSS/BSS requirement by proposing an interim approach that entailed "cloning" the relevant IT systems of Singtel within NLT's IT environment ("**Interim Approach**"). In August 2018, IMDA assessed that the Interim Approach had met the Independence Requirement, subjected to conditions, which included NLT continuing to implement a Replacement OSS/BSS. The system for the Interim Approach was implemented on 3 September 2018. IMDA will continue to monitor NLT's progress in implementing the Replacement OSS/BSS.
IMDA's Determination	In assessing the financial penalty, IMDA took into account all relevant factors, including the following: a) NLT's failure in delivering the Replacement OSS/BSS based on its proposed timelines; b) NLT's demonstration of good faith in fulfilling the Independence Requirement with investments made pending the implementation of a Replacement OSS/BSS; and c) The complexity and significant effort involved to migrate its existing system to the Replacement OSS/BSS.

	IMDA imposed a $100,000 financial penalty for the delay by NLT in meeting the Independence Requirement.