

Questions	M1 Comments
<p>Question 1:</p> <p>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;</p> <p>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; and</p> <p>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).</p>	<p>(i) M1 notes that pre-identifying a suitable location for mobile deployment will be useful for BOs in terms of resource planning. At the same time, operators will be able to benefit by ensuring that there is adequate space for deployment, which lets us better serve the end users in a particular development.</p> <p>(ii) Nonetheless, mobile deployment planning is not straightforward and needs to account for the other developments in a particular area. Given the fast pace of development in Singapore, our initial mobile deployment plan may change. Since private developments in a particular area are not all built at the same time (unlike HDB which builds flats in a cluster), this compounds the challenges in accurately forecasting the coverage impact and requirements in a particular area at the pre-development phase. Time is also needed to plan and forecast the coverage requirements. If a high volume of developments is launched at one go, inevitably, there will be manpower constraints in forecasting all sites in a short period of time.</p> <p>M1 proposes that mobile installation space (using the guidelines set out in (iii) below) are catered for by the BOs in the design phase. In our view, such guidelines are not unduly onerous for the BOs. Where an operator has determined that a particular development is most suitable for its coverage needs, will it then engage the BO directly.</p> <p>(iii) Given the challenges, M1 proposes that the provision of mobile installation space (MIS) by the BOs should incorporate the following requirements:</p> <ul style="list-style-type: none"> • Provision of a 20 amp 3 phase isolator at the rooftop at minimum, with 32amp 3 phase isolator being ideal • Telecommunications riser access should span all the way to the rooftop from the designated MDF room

	<ul style="list-style-type: none"> • Provide 100mm telecom trunking to the designated MIS space on the rooftop from the telecommunications riser • Allowing at least 1.5Kn/sqm floor loading for equipment within the MIS space <p>The above will greatly facilitate planning, enabling the operators to decide how best to use the allocated space for mobile deployment.</p>
<p>Question 2</p> <p>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; and</p> <p>ii. Whether it is beneficial for telecommunication risers and telecommunication cable trays to be extended below B1 for future provisioning?</p>	<p>(i) M1 is supportive of the proposal for BOs to provide telecommunication risers, and cable trays alongside electrical cable trays in the B1 carpark. This should be the basic minimum, given the increased demand/expectation for mobile coverage in B1 carparks in recent years. Details can be shared subsequently at another session.</p> <p>(ii) While it will be beneficial to operators, we are also of the view that such infrastructure should reasonably be funded by the BOs. Good mobile coverage in basements beyond B1 benefits the end users and their user experience. In turn, the BOs benefits as good mobile coverage enhances the attractiveness of the development.</p> <p>In reviewing the revisions to the COPIF, M1 also seeks to understand if there are relevant changes that may be made to other coverage obligations promulgated by other regulations. In particular, will these revisions to COPIF lead to any additional requirements in the Quality of Service framework, which was only amended recently.</p>
<p>Question 3</p> <p>i. The corresponding land take (i.e., space) required for each street lamppost deployment; and</p>	<p>(i) M1 is supportive of IMDA's proposal. Regarding the space required for street lamppost deployment, M1's experience is that it generally requires about 6 sqm.</p> <p>(ii) In M1's experience for lamppost deployments, we have not encountered any major safety and aesthetic concerns. Could IMDA clarify what such concerns are? That said, M1 urges that there should not be excessively stringent requirements for lamppost</p>

<p>ii. Feasible solution(s) to address safety and aesthetic concerns for such lamppost deployments.</p>	<p>deployment. Items such as unnecessary camouflage serve as an impediment to effective coverage.</p>
<p>Question 4</p> <p>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;</p> <p>ii. The information to be provided by a BO in order for MNOs to assess and facilitate any proposed temporary or permanent relocation; and</p> <p>iii. The cost responsibility between a BO and an MNO for such temporary or permanent relocation.</p>	<p>(i) M1 seeks to understand how “reasonable” will be defined by IMDA. A proposed relocation can arise due to a variety of events such as additions and alteration works or waterproofing works. Thus, we propose a fixed timeline of <u>3-6 months</u> (for temporary installation) and <u>6-9 months</u> (for fixed installation) for notice to be given in the first instance for all proposed relocations, with BOs to explain to IMDA why the stipulated notice cannot be given. Depending on the type of site and scale of works needed, operators can then inform BOs if further time is needed.</p> <p>(ii) The information given to operators should be as comprehensive as possible. These should include, at minimum:</p> <ol style="list-style-type: none"> 1. Reason for relocation 2. Details of BO’s request that impact the existing deployment and potential relocation (if applicable) 3. Schedule of BO’s request <p>(iii) M1 disagrees and submits that the existing position under the current edition of COPIF should be retained. We submit it is not a valid basis on the part of the BO to deny operators MIS just because relocation costs are required to be borne by BOs. Mobile service is increasingly treated as an essential service and it is important that IMDA enforce compliance to the COPIF to clearly drive home that notion to the BOs.</p> <p>It will be gravely inconsistent that fixed line operators are permitted to pass the cost of diversion of fibre to the BOs when requested by the BOs but the same is not extended under the proposed revisions to COPIF.</p>

<p>Question 5</p> <p>i. Should BO be allowed to recover such access charges from MNOs for each instance of rooftop access requested by an MNO;</p> <p>ii. Should the access charges be different for buildings with and without security guards on site; and</p> <p>iii. Should access charges be determined and set by IMDA? What would the appropriate benchmark for IMDA to adopt?</p>	<p>(i) M1 strongly disagrees for such charges to be recovered by BOs from operators. As stated in our letter, mobile services are increasingly regarded as an essential service. It is unclear why currently there are different treatment offered depending on the nature of the service. There ought to be uniformity in treatment and telecom operators should be able to enter all of our sites without access charges across both public and private developments.</p> <p>We reiterate that access is <u>requested strictly on a need-to basis</u>. The purpose of access is to allow M1 to perform essential maintenance and ensure the network remains active, thereby avoiding any disruption to our end users.</p>
<p>Question 6</p> <p>Whether it is useful for IMDA provide a sample agreement and if so, what terms and conditions should be included in the agreement</p>	<p>A sample agreement would not be useful unless IMDA mandates that the agreement terms cannot be altered substantively. In our experience, this is unrealistic as BOs often negotiate terms with operators, with IMDA taking a non-intervention approach.</p>
<p>Question 7</p> <p>i. Whether there will be impact or prejudice to the (existing or new) BOs and MNOs in the two scenarios described above; and</p> <p>ii. Whether there is a need for an expiry date for the MIS Agreement</p>	<p>(i) M1 is supportive of the changes proposed by IMDA.</p> <p>However, IMDA has not addressed how to handle the situation of the lease of the underlying property being returned to the reversionary owner (e.g. SLA) for reasons unknown to M1. How can operators ensure that the mobile operation at the site is not impacted by such a reversion?</p> <p>In past occasions, notably in the Lim Chu Kang area, there were real risks of power interruptions because operators could not engage with Singapore Power for the</p>

	transfer of power supply without intervention from IMDA. Can such situations be avoided under the revised edition of COPIF?
<p>Question 8</p> <p>i. The proposal for a PE to be engaged for such mobile deployments</p>	<p>M1 does not have any objections.</p> <p>However, M1 would like to highlight that for older buildings, even with the engagement of a PE, there are still challenges in purchasing structural drawings that facilitates a PE's calculations. This is because such drawings require approval from the BOs. As such, M1 appeals to the IMDA to intervene in a timely manner when such approval from the BOs are not forthcoming.</p>
<p>Question 9</p> <p>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</p>	<p>M1 will not be commenting on this as it is not relevant to M1.</p>
<p>Question 10</p> <p>i. The proposal to remove and/or reduce the telecommunication Space and Facilities for small single-user non-residential development as described above;</p> <p>ii. Any feedback on the current required telecommunication Space and Facilities, such as the MDF room sizes, for the different types of developments?</p>	<p>M1 will not be commenting on this as it is not relevant to M1.</p>

<p>Question 11</p> <p>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.</p>	<p>M1 will not be commenting on this as it is not relevant to M1.</p>
<p>Question 12</p> <p>The proposal for the same Telecommunication Space and Facilities obligations imposed on buildings</p>	<p>M1 has no views on this proposal.</p>
<p>Question 13</p> <p>Other potential changes to enable our telecommunications infrastructure to be future-ready to support Singapore's digital economy</p>	<p>(i) In light of the increased prevalence of 5G deployment, which was not deployed back when the current edition of COPIF came into force, the space requirement for mobile equipment must be reviewed as well. As IMDA would be aware, effective 5G rollout requires a far denser equipment deployment than 4G, which in turn increases the number of sites which operators would need to deploy. It cannot be the case that the quantum of MIS remains unchanged despite the advent of 5G. Apart from 5G deployment, operators have to adopt a more risk-adverse approach when it comes to deploying our equipment on sites, in light of recent concerns from BOs on the structural impact that operators may cause to the building. This has necessitated operators to utilise deployment that requires a larger floor space (e.g. increased plinth width to decrease load bearing on plinths). Given these factors, M1 submits that the maximum mobile installation space across each tier of COPIF should be increased by 1/3 more.</p> <p>Accordingly, COPIF must provide for mobile installation space even for smaller development less than 80 units. If IMDA is amenable to this proposal, M1 would put forth a figure for IMDA's consideration.</p>

	<p>In addition, given the emphasis of coverage for both outdoors and basement car parks, operators must also be allocated additional space for deployment in basement car parks. It cannot be the case that an operator is expected to serve the same development for both outdoor and basement car parks with just one deployment location.</p>
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