Feedback on COPIF Consultation Paper

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Time Submitted	Tue, 21 Apr 2026, 02:56:49 PM
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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?	While it is good for the industry collaboration to pre-identify a suitable location for mobile deployment, for BOs, it may limit our freedom in design and locating the MIS best suited for our needs. It may turn into a long-drawn process between MNOs and BOs to come to an agreement on the final location, while adds unnecessary time and workload to the project team. (at the moment, MNOs have to accept the MIS location as long as it complies with COPIF and they have to do the necessary installation at their cost)
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?	
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).	

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?	

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.	Reasonable lead time: 3 months
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.

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.

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?

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	Observation and recommendation: The current process for managing telecommunication infrastructure and engaging MNOs during A&A works is fragmented and inefficient, hence posing operational and construction timeline risks to BOs. Establishing a centralised system under IMDA, supported by clearer accountability and enforcement mechanisms, will significantly reduce delays, improve coordination, and support smoother project execution for all stakeholders. Key issues include: 1. Lack of Centralised Records - There is no single, reliable source of reference for existing telecommunication infrastructure. 2. Incomplete or Unavailable Data - Cables may be unlabelled, necessitating on-site investigative work to determine cable ownership and whether cables are active or redundant. 3. Inefficient Coordination with MNOs - Engagement through IMDA is slow, and direct outreach to MNOs yields inconsistent responses. - Proposals submitted by MNOs are often unclear. 4. Lack of Proper Documentation - MNOs may not provide line diagrams or drawings for proposed cable routing, making it difficult to plan diversion works accurately. Key Recommendations: 1. Establish a Single Source of Information - Appoint an agency as the central custodian of all telecommunication infrastructure records, similar to the role of BCA for building plans. 2. All MNOs shall be required to submit up-to-date records of existing and new cable installations, upon work completion. - BOs can then access or purchase these records when required for planning and works. 3. Appoint a Single Term Contractor - Engage one term contractor to coordinate and manage all MNO-related works. This will streamline communication, reduce duplication, and improve accountability across different operators. 4. Right to Remove Unidentified or Abandoned Cables - After a reasonable notice period is given to MNOs to identify and relocate their infrastructure, BOs should reserve the right to remove unlabeled or unclaimed cables to prevent indefinite delays caused by unclear ownership.