

COPIF FEEDBACK FORM

Question 1

- (i) Any views on the obligations to be imposed on Building Owners (BO) and Mobile Network Operators (MNO) to facilitate this process of pre-identifying a suitable location for mobile deployment;**
- (ii) Whether it is useful for MIS to be identified upfront during development design phase; and if so, an appropriate engagement process between the BOs and MNOs, such as leverage on Corenet, similar to the process, where the Telecommunication Facility Co-ordination Committee engages the developers/BOs; and**
- (iii) The appropriate period/timeframe for MNOs to be granted access to carry out their installations without disrupting the TOP schedule (X months prior to the TOP date).**

Response

Observation (from recent project experience):

For Greenfield project, Mobile Installation Space (MIS) was designed according to COPIF requirements and approved by TFCC. MIS completed 9 months ahead of targeted TOP to allow MNOs early access for installation. However, MNOs did not respond and no follow up until Project team engaged a manager from one of the MNOs, 3 months before TOP. When MNOs came on site, there were new requests – 1) shift the position of MIS (impossible as project was nearing TOP), 2) additional isolators (possible but above COPIF requirements).

Key issues:

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 adding 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)

Key recommendations:

1. Give MNOs timeline such that design/approval process is not hindered.
2. Make telecommunications risers GFA exempt.

Question 4

- (i) **A reasonable lead time for a notice to be served by the Building Owner (BO) to an MNO prior to any proposed temporary or permanent relocation.**

Response

Reasonable lead time: 3 months

Question 13

- (i) **Other potential changes to enable our telecommunications infrastructure to be future-ready to support Singapore's digital economy.**

Response

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:

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 unlabelled or unclaimed cables to prevent indefinite delays caused by unclear ownership.