

REPUBLIC OF SINGAPORE

Telecommunications Act Cap. 323

Code of Practice
for Competition in the Provision of Telecommunication Services
(Section 1.6.1)

**NOTIFICATION OF EXEMPTION
BY THE
INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY
OF SINGAPORE**

1. On 1 March 2001 and 2 March 2001, Singapore Telecommunications Limited (“SingTel”) filed its requests for exemption from certain provisions of the Code of Practice for Competition in the Provision of Telecommunication Services (“Code”) applicable to SingTel’s Reference Interconnection Offer (“RIO”).
2. Specifically, SingTel requested exemptions from the following obligations: (a) to offer co-location for Point of Access (“POA”) at Orchard and City South Exchanges; (b) to offer co-location for POA at City Exchange.
3. Pursuant to Section 1.6.1 of the Code, IDA may grant a Licensee’s request to be exempted from specific provisions of the Code “[w]here good cause is shown”. The exemptions may be “on a one-time basis, temporary, permanent, for a fixed period or effective until the occurrence of a specific event”.
4. After giving careful consideration to SingTel’s request, for the reasons set forth below, IDA hereby takes the following actions:
 - IDA grants SingTel a temporary exemption from its obligation to offer co-location (physical and virtual co-location) for POA at Orchard and City South Exchanges. The exemption will be for a period of 3 months from the date of this notice.
 - IDA will not grant SingTel an exemption from its obligation to offer co-location (physical and virtual co-location) for POA at City Exchange.

Temporary Exemption Granted

5. ***Co-location for POA at Orchard and City South Exchanges.*** Pursuant to Section 4.2.1 of Appendix Two of the Code and SingTel’s RIO, SingTel must provide co-location in exchange buildings, telecommunication equipment rooms, satellite earth stations, submarine cable landing stations/frontier stations and radio tower sites. SingTel requested

to be exempted from its obligation to offer co-location for POA at Orchard and City South Exchanges due to technical, operational and safety considerations at the MDF. In support of its request, SingTel explained that the MDF jumper fields at Orchard and City South Exchanges have been overloaded to the extent that the jumper wires are hanging out from the edge of the trays. This has posed considerable operational and safety concerns during service provisioning to SingTel's customers. Aggravated from such loadings, the steel framework has already shown signs of stress and cracks. SingTel's civil and structural consultant has recommended that SingTel should cease loading the crack frames with additional jumper wires for both City South and Orchard Exchanges. SingTel further indicated that it has made conscious efforts to reduce the loading on the MDF by recovering the unused jumper wires in the MDF jumper fields and embarking on FTTC and V5.2 projects where termination via the MDF would not be required. However, the number of jumper wires provisioned still exceeds the recovery effort.

6. IDA has conducted detailed site surveys to Orchard and City South Exchanges on 30 March 2001 to assess and verify SingTel's justifications for exemption. Having assessed and verified the technical, operational and safety problems faced by SingTel, IDA therefore grants SingTel a temporary exemption from its obligation to offer co-location (physical and virtual co-location) for POA at Orchard and City South Exchanges. The exemption will be for a period of 3 months from the date of this notice. SingTel is required to rectify the technical and operational problems during the 3 months exemption period by recovering the unused jumper wires in the MDF jumper fields so as to enable Requesting Licensees to obtain co-location for POA at these exchanges after the exemption period.

Exemption Denied

7. ***Co-location for POA at City Exchange.*** Pursuant to Section 4.2.1 of Appendix Two of the Code and SingTel's RIO, SingTel must provide co-location in exchange buildings, telecommunication equipment rooms, satellite earth stations, submarine cable landing stations/frontier stations and radio tower sites. SingTel requested to be exempted from its obligation to offer co-location for POA at City Exchange due to technical and operational considerations at its MDF. In support of its request, SingTel explained that there are currently limited number of available MDF verticals at City Exchange. These MDF verticals are required by SingTel to meet the telecommunication services needs for the development plans at Marina South Centre and to serve its own telecommunication services needs of City South Exchange. SingTel further indicated that the expansion of the MDF is technically not feasible as the frames have reached its physical limit and have been installed very close to the building walls. Noting the limited MDF verticals available, SingTel has planned for more FTTC and V5.2 implementations in the area served by City Exchange where termination via the MDF would not be required. However, there will still be requirements to provide copper pairs to serve SingTel's customers and these available MDF verticals would be required.

8. IDA has conducted detailed site surveys to City Exchange on 30 March 2001 and 17 May 2001 to assess and verify SingTel's justifications for exemption. IDA has also required SingTel to furnish further information to substantiate their requirements for the available MDF verticals at City Exchange. While IDA recognised that SingTel will progressively require the MDF verticals to meet its own telecommunication needs, however, IDA believes that this should not preclude the Requesting Licensees from requesting for co-location for POA at City Exchange at this point in time. IDA also notes that MDF verticals that are currently used by SingTel may be made available in future if SingTel decommissions some of its existing switches. SingTel is therefore still required to accommodate the Requesting Licensees' requests for co-location for POA at this exchange. IDA will not grant SingTel an exemption from its obligation to offer co-location for POA at City Exchange.

Conclusion

9. This Notification is effective immediately.

Dated: 30 May 2001

Director-General (Telecoms)

Info-communications Development Authority of Singapore