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29 August 2014

Ms Aileen Chia
Deputy Director-General (Telecoms & Post)
Info-communications Development Authority of Singapore
10 Pasir Panjang Road
#10-01 Mapletree Business City
Singapore 117438

Dear Ms Chia,

CONSULTATION ON THE REVIEW OF INTERNAL WIRING FRAMEWORK

Singapore Telecommunications Ltd (**SingTel**) is pleased to respond to the Info-communications Development Authority of Singapore (**IDA**) invitation to comment on the proposed revisions to the Internal Wiring Framework (**IW Framework**).

SingTel and its affiliates offer a comprehensive portfolio of services that include voice, data, Internet and pay TV services over a variety of platforms to residential and non-residential customers across Singapore.

As a leading provider of telecommunications services and a leading proponent of innovation and competition, the SingTel group has a strong interest in the effective operation of the IW Framework to ensure that good quality internal telecommunication wiring work (**IW Work**) is being constructed.

Executive Summary

In summary, SingTel submits our comments as follows:

- SingTel welcomes the proposed revision to the scope of the IW Framework;

- IDA should only issue the installer class licence to individuals who have passed the relevant courses approved by IDA;
- IDA should retain the requirement to obtain readiness certification for coaxial cables and optical fibre cables under COPIF 2013 even if such cables have been installed by installer and/or contractor class licensees; and
- SingTel welcomes the proposed revisions to the IW Work licensing structure and has proposed some enhancements as described in detail below.

Main Submissions

1. **SingTel Welcomes The Proposed Revision To The Scope Of The IW Framework**
 - 1.1 The current IW Framework regulates persons who carry out IW work using twisted-pair (category 3) cable within end-user premises. With the increasing demands for high bandwidth services within the end-user premises and the building (**Sites**), SingTel agrees with the IDA that it is timely to conduct a review of the IW Framework to:
 - (a) include coaxial cables, structured (category 5E and above) cables and optical fibre cables; and
 - (b) extend the scope of the IW Framework to include IW Work within the buildings.
 - 1.2 It is crucial to ensure that IW Work is performed properly and professionally by licensed persons in order to safeguard the investments of end-users, developers and building owners, enhance the integrity and delivery of broadband telecommunication services to the Sites and increase customers' satisfaction with the services provided by the IW Work installers/contractors and telecommunication service providers.

1.3 In the estate agency industry, the Council for Estate Agencies (CEA) has been successful in raising the professionalism of the industry and safeguarding consumer interest. Instead of reliance on industry self-regulation to achieve professional conduct and quality, legislation was introduced to govern the performance of estate agencies in order to safeguard consumer interests. The CEA has introduced industry examination, mandatory continuing professional development training and disciplinary processes.

1.4 Senior Minister of State Tan Chuan-Jin said at the Asia Pacific Real Estate Convention and Expo 2013 that:

“...The efforts put in by CEA and the industry is starting to bear fruits. A Public Perception Survey carried out last year saw eight in 10 consumers expressing satisfaction with the services provided by their salespersons.”¹

2. IDA Should Only Issue The Installer Class Licence To Individuals Who Have Passed The Relevant Courses Approved By IDA

2.1 SingTel submits that the IDA should only issue the installer class licence to individuals who have passed the relevant courses approved by the IDA.

2.2 Skills acquired from Public Telecommunications Licensee (PTL) certification training courses may not always be relevant to the needs of other PTLs. A PTL may tailor its training and certification to meet the PTL specific network and telecommunication service requirements. The PTL may conduct training courses for various reasons such as:

- (a) to control the quality;
- (b) to ensure that the IW Work is compatible with its network; and

¹ The full transcript of Senior Minister of State Tan Chuan-Jin's speech at the Asia Pacific Real Estate Convention and Expo 2013 is available on the Ministry of National Development website at: <http://app.mnd.gov.sg/Newsroom/NewsPage.aspx?ID=4363&category=Speech&year=2013&RA1=&RA2=&RA3=>

- (c) to ensure that the IW Work is suitable for its telecommunications services.
- 2.3 SingTel agrees with the IDA that PTL-certified installers should only be recognised as qualified installers possessing the relevant skills to carry out IW Work under the revised IW Framework on the condition that the PTLs:
- (a) submit their training syllabus to IDA for prior review by the panel; and
 - (b) provide IDA with the necessary verification that their certified installers have completed the necessary training in respect of all the cable types that their installers are certified for.

Training courses

- 2.4 SingTel supports the IDA's proposal to set up a panel comprising of academics, representatives from the industry and PTLs to review the course material. The panel will ensure that approved training courses are of an adequate standard and are relevant for the purposes of the IDA's licensing scheme for the IW Framework.
- 2.5 SingTel applauds the approach proposed by the IDA to help manage the compliance cost of such additional regulatory measures. To further reduce the compliance cost for installer and contractor class licensees, SingTel proposes that
- (a) the Singapore Workforce Development Agency training grants be extended to the approved courses; and
 - (b) the IDA to consider introducing seed funding to encourage training organisations to set up relevant courses within the proposed 9-month transition period.

3. Retain The Requirement To Obtain Readiness Certification For Coaxial Cables And Optical Fibre Cables Under COPIF 2013 Even If Such Cables Have Been Installed By Installer and/or Contractor Class Licensees

3.1 SingTel supports the IDA's proposal to retain the requirement to obtain readiness certification for coaxial cables and optical fibre cables under COPIF 2013 even if such cables have been installed by installer and/or contractor class licensees.

3.2 The readiness certification provides building developers, building owners and subsidiary proprietors with the assurance that the IW Work meets the required standards. Such a requirement also provides assurance that the building is ready to receive telecommunications services prior to occupation.

4. Proposed Revisions to the IW Work Licensing Structure

4.1 SingTel agrees with the IDA's proposal to include, as a licence condition under the IW Framework, the requirement that installer and contractor class licensees who carry out any IW Work shall be required to sign off and retain records of the IW Work carried out for at least twelve (12) months from the date of completion of the IW Work.

4.2 In addition to the proposed list of information to be retained (as detailed in paragraph 16 of the consultation paper), information such as the date(s) testing was conducted and the cable routing information (including serving cable and/or stump) will also provide important documentary evidence to ensure quality and to facilitate investigation if there are complaints. As such, installer and contractor class licensees should also be required to retain such information.

4.3 SingTel notes that IDA may suspend or cancel the relevant licence, whether in whole or in part, in the event of a breach of licence conditions or any provision of the IW Code by individuals under the installer class licence. SingTel believe that the IDA can consider adopting similar investigation and disciplinary processes which the CEA has used, such as:

- (a) a complainant may lodge a complaint in person, writing, telephone or by email;
- (b) meeting with the complainant;

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- (c) detailed response from the licensee; and
 - (d) alleged case to be put before a disciplinary committee.
- 4.4 SingTel submits that adopting a structured approach towards handling such errant installer and contractor class licensees will increase consumer satisfaction.
- 4.5 Please do not hesitate to contact us if you have any queries or require further clarification.

Yours sincerely,



Sean Slattery
Vice President
Regulatory & Interconnect Strategy
Singapore Telecommunications Limited
Company Registration No.: 199201624D