

**PUBLIC CONSULTATION PAPER ISSUED BY  
THE MINISTRY OF COMMUNICATIONS AND INFORMATION AND  
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**DRAFT POSTAL SERVICES (AMENDMENT) BILL**

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|  |              |
|--|--------------|
| <b>PART I: INTRODUCTION</b>  | <b>Pg 2</b>  |
| <b>PART II: MARKET SHIFTS IN THE POSTAL SECTOR</b>   | <b>Pg 3</b>  |
| <b>PART III: ENHANCEMENTS TO FACILITATE THE DEPLOYMENT<br/>OF A NATIONWIDE PARCEL LOCKER NETWORK<br/>TO ENSURE RELIABLE LAST-MILE DELIVERY</b> | <b>Pg 5</b>  |
| <b>PART IV: CLARIFICATIONS AND ENHANCEMENTS TO<br/>STRENGTHEN OVERSIGHT OF THE POSTAL SECTOR</b>   | <b>Pg 10</b> |
| <b>PART V: PROCEDURES AND TIMEFRAME FOR SUBMITTING<br/>COMMENTS</b>  | <b>Pg 14</b> |

**PUBLIC CONSULTATION PAPER**

**DRAFT POSTAL SERVICES (AMENDMENT) BILL**

**PART 1: INTRODUCTION**

1. The Postal Services Act (**PSA**) is the legislative framework that governs the regulation of Singapore's postal sector. Under the PSA, the Infocomm Media Development Authority (**IMDA**), as the appointed Postal Authority, has the powers to grant or modify licences, issue directions, codes of practice and standards of performance, amongst others, for the conveyance of letters weighing 500 grams or less. IMDA's functions include ensuring that postal services are reasonably accessible to all people in Singapore, and are supplied as efficiently and economically as practicable.
2. The PSA was last revised in 2007, when IMDA fully liberalised Singapore's postal services market. The postal landscape has since evolved and there have been shifts in the market, such as the growth in e-commerce deliveries. It is therefore timely for the Ministry of Communications and Information (**MCI**), together with IMDA, to ensure that the legislative framework for postal systems and services provided for in the PSA remains relevant to and appropriate in the current environment.
3. The proposed legislative amendments to the PSA seek to address the existing postal landscape and ongoing developments, in order to ensure that the PSA evolves to meet the social, industrial, and commercial needs of Singapore. They will also clarify and enhance existing legislation.
4. MCI/IMDA is launching this public consultation to seek views and comments on the proposed drafting of the revisions to the PSA. This consultation paper summarises and outlines the key policies reviewed, the rationale for the review, and the procedures for members of the industry and public to submit their views and comments by 23 December 2020. The proposed Postal Services (Amendment) Bill is attached as **Annex B**.

## PART II: MARKET SHIFTS IN THE POSTAL SECTOR

### Background

5. The postal services market was fully liberalised in 2007. Today, there are four companies<sup>1</sup> licensed to deliver letter mail in Singapore. The delivery of non-letters (e.g. small packets and parcels) does not require a licence. There are many operators, including international service providers<sup>2</sup>, providing delivery of non-letters.
6. MCI/IMDA has observed changes in the mailing habits of consumers and businesses. There continues to be a shift towards substituting letters with electronic means of communications (i.e. e-substitution), such as e-mail and e-invoicing, which has resulted in declining letter mail volumes. Concurrent with the above shift, there has been a growing number of small packets and parcels, driven by e-commerce. These trends, taken in tandem, have resulted in a higher proportion of non-letters being received and delivered via the public postal network.
7. The surge in parcels delivered through the postal network is expected to intensify, given that e-commerce volumes were projected to grow at 12% to 20% annually over the next five years<sup>3</sup>, even before the onset of COVID-19. Today, most parcels are delivered to the doorstep. Doorstep deliveries reduce logistics service providers' productivity as they take more time and resources, especially when repeated trips to the same address are needed due to failed deliveries. Consumers are also inconvenienced by failed doorstep deliveries. The current letter box infrastructure is also not designed to receive all parcels for last-mile delivery.
8. Besides doorstep delivery, consumers can collect their parcels through other means, such as from parcel lockers operated by private-sector locker operators. However, the current level of last-mile parcel locker deployments would not be able to support the projected growth in parcel volumes. MCI/IMDA has also observed that the parcel locker market is fragmented and has thus far been generally private-sector driven. Competing players have built proprietary networks, with each operator's parcel lockers forming a 'closed system' that is not designed to be accessed by other operators. In addition, such parcel lockers are largely concentrated and duplicated in commercial areas with high footfall, with most parts of the residential market being underserved. With the increasing demands and expectations for reliable last-mile parcel delivery, there is a need for the public postal infrastructure to evolve to offer practical alternatives to doorstep deliveries and private sector-owned parcel lockers.

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<sup>1</sup> The four companies licensed as postal service operators are Asendia Singapore Pte Ltd; DHL eCommerce (Singapore) Pte Ltd; Singapore Post Limited; and World Marketing Group Pte Ltd.

<sup>2</sup> These include SingPost, DHL, FedEx, Ninja Van, UPS, Ta-Q-Bin, etc.

<sup>3</sup> Sources: Industry estimates, *e-Conomy SEA 2019*. [www.bain.com/insights/e-conomy-sea-2019](http://www.bain.com/insights/e-conomy-sea-2019).

## **ANNEX A – Public consultation paper on draft Postal Services (Amendment) Bill)**

9. In December 2018, IMDA led an inter-agency pilot, Locker Alliance, to validate the demand for an open-access, shared parcel locker infrastructure for last-mile parcel delivery. The aim of such infrastructure was to provide greater convenience to consumers with 24/7 access to the parcel lockers, enhance efficiency with aggregated deliveries to lockers instead of individual homes, and create an open and interoperable network for logistics service providers and e-commerce marketplaces to access a single network. A total of 70 parcel locker stations were built by private-sector operators in collaboration with IMDA in Punggol and Bukit Panjang HDB towns, and eight MRT stations. The pilot received positive responses from both logistics service providers and users.

### **Our vision and strategy**

10. Building on the results of the pilot programme, MCI/IMDA aims to transform the infrastructure for last-mile parcel delivery by deploying a new nationwide network of parcel lockers to complement the existing letter box infrastructure. This new infrastructure, to be deployed at HDB estates, public transport nodes and community spaces, will provide consumers with greater convenience and options for parcel deliveries, and enable the logistics sector to realise productivity gains and cost savings. The proposed changes to the PSA seek to enable this transformation.
11. The findings from the Locker Alliance pilot validated and reinforced the need to transform the last-mile parcel delivery infrastructure. To this end, 1,000 parcel locker stations will be deployed by end 2021 throughout Singapore. In public residential areas where parcel locker stations are deployed, each station will be located about five minutes' walk or within 250m of residents' homes.
12. The Network will be an open-access network, which will (subject to conditions) allow any logistics service provider or e-commerce marketplace to use the lockers. Logistics service providers shall access the public parcel lockers by interfacing with a software platform that enables interoperability.
13. Details of MCI/IMDA's proposals are in the sections below.

**PART III: ENHANCEMENTS TO FACILITATE THE DEPLOYMENT OF A NATIONWIDE PARCEL LOCKER NETWORK TO ENSURE RELIABLE LAST-MILE DELIVERY**

**Revisions to provide the Postal Authority with the powers to own and operate the nationwide parcel locker network at specified premises and appoint a public parcel locker network operator**

14. Today, IMDA, as the appointed Postal Authority, has the exclusive privilege of conveying letters and performing all incidental services of receiving, collecting, sorting, sending, dispatching, and delivering letters. Such activities can be undertaken only by the IMDA or parties licensed or authorised by IMDA to do so. MCI/IMDA is proposing to expand the scope of the Postal Authority's exclusive privilege to include the installation, ownership, and operation of the Network (referred to in the draft Bill as 'public parcel locker network') at specified premises. The proposed legislative amendments seek to:
- a. Address the industry's concerns by having a neutral parcel locker operator that allocates lockers to logistics service providers, which compete with each other, on a non-discriminatory basis;
  - b. Enable the expeditious deployment and seamless end-to-end service integration of the Network;
  - c. Allow the pervasive deployment of the Network at both high-traffic and underserved locations that provide the public greater convenience; and
  - d. Minimise the dis-amenities stemming from different operators deploying competing parcel locker stations in the same location.
15. The exclusive privilege of the Postal Authority to install, own and operate the Network will be confined to **specified premises**, defined as: (i) the common property of a building in an HDB housing estate (i.e. HDB void decks, town centres and HDB-managed shopping complexes); (ii) bus interchanges, railway commuter facilities or railway premises (e.g. MRT stations); (iii) community centres/clubs managed or run by the People's Association<sup>4</sup>; and (iv) State land adjoining any of the above premises. Additionally, the Minister may, by order in the *Gazette*, prescribe any other premises as specified premises.

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<sup>4</sup> For private locker operators with existing lockers installed at HDB residential estates and MRT stations as part of the Locker Alliance pilot, or in community centres/clubs, contracts will expire in 2020 and 2021, after which IMDA will install its lockers as part of the Network. IMDA will grant exemptions to these operators for a specified time period.

## **ANNEX A – Public consultation paper on draft Postal Services (Amendment) Bill)**

16. MCI/IMDA also clarifies that the exclusive privilege does not apply to the conveyance of parcels into the Network. The exclusive privilege pertains only to the establishment, installation, operation and maintenance of the Network.
17. The Postal Authority will appoint a public parcel locker network operator to perform the Postal Authority's function and duty to establish, install, operate and maintain the Network. The public parcel locker network operator will be subject to conditions that are imposed by the Postal Authority. These may include terms and conditions on the use of and access to the Network, including any pricing and rate charges. In the first instance, the Network will be operated by IMDA's wholly-owned subsidiary, Pick Network Pte Ltd.
18. Notwithstanding the above, the Postal Authority will also retain residual power to deploy and run a Network if: (i) the Postal Authority is of the view that the public parcel locker network operator is not complying with its obligations; or (ii) to give effect to any direction of the Minister. In this case, the Postal Authority may determine the terms and conditions of the use of and access to the Network, including any pricing and rate charges.
19. Further to that, the Postal Authority may also prescribe classes of parcels (e.g. hazardous material, controlled substances, etc.) that are prohibited from being placed in the Network, for reasons such as security and safety concerns.

**Question 1: Please provide views and comments on the proposed inclusion of the new Sections 23A to 23G and amendment to Section 3A of the PSA to accord the Postal Authority the exclusive privilege to install, own and operate the Network in specified premises and appoint a public parcel locker network operator.**

### **Requirement for building owners and developers of specified premises to provide space or facility and access thereto for the installation and operation of the nationwide parcel locker network**

20. To ensure that residents can benefit from having public parcel lockers near their homes, it is important to ensure that the public parcel locker network operator or the Postal Authority can secure the necessary spaces, and access required for the timely installation and maintenance of the parcel lockers. The powers and the key procedures (including any disputes as to compensation) are laid out in the new Sections 23H to 23T of the PSA.
21. Specifically, MCI/IMDA intends for the provision, maintenance and access to spaces for public parcel lockers to be provided at the owner/developer's own expense, as they are social and public infrastructure intended to close the last-mile delivery gap, and provide positive externalities, such as greater convenience for consumers and more options for parcel deliveries.

22. In this regard, MCI/IMDA is proposing legislative amendments to empower the Postal Authority to issue one or more codes of practice to regulate and facilitate the use of, and access to, space or facility in specified premises for the deployment of the Network. The proposed regulatory framework aims to cover the following key aspects:
- a. Developers and building owners must provide space and/or facility, and access thereto, upon request by IMDA and/or the public parcel locker operator which is required to provide nationwide coverage<sup>5</sup>; and
  - b. Such provision of space and/or facility within the specified premises will be limited to the public parcel locker network operator for the purposes of the Network, and to enable timely deployment and minimise delays caused by negotiations. The operator will not be required to pay for the right to enter or use any land or premises.

**Question 2: Please provide views and comments on the proposed inclusion of the new Sections 23H to 23T of the PSA to provide IMDA with the powers to establish a framework to regulate and facilitate the use of, and access to, space or facility in specified premises for the deployment of the Network, and to provide the public parcel locker network operator with powers related to the installation, operation, and maintenance of public parcel lockers.**

**Enforcement powers and offences relating to public parcel lockers deployed at specified premises**

23. Today, any postal article sent by post which is suspected to be sent in contravention of the PSA (or any regulations made under the PSA) may be detained and examined by the Public Postal Licensee (**PPL**) or otherwise dealt with in accordance with the directions of the Postal Authority.
24. With the establishment of the Network, similar provisions will have to be put in place for parcels or objects placed or found in the Network. These include powers for the Postal Authority, or the public parcel network operator under the direction of the Postal Authority, to detain and examine such parcels or objects. Such powers are only for the purposes of: (i) investigations into cases where the parcel, article or object is or is suspected to be the subject of or used in the commission of offences under the PSA and its regulations; or (ii) when the presence of the parcel, article or object in the public parcel locker is contrary to public safety and security.

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<sup>5</sup> Building owners cannot reject such requests for parcel locker deployments unless approved by IMDA under exceptional circumstances, e.g. where such deployments may breach safety standards.

## **ANNEX A – Public consultation paper on draft Postal Services (Amendment) Bill)**

25. These provisions are included under the new Sections 23U and 48B, while the new Section 48C sets out the follow-up actions for parcels and objects detained or seized under the PSA.
26. MCI/IMDA also proposes to expand Section 46 on the power to require information for the purpose of conducting an investigation or discharging its function under the PSA to include the Network.
27. In addition, to ensure the safe use and operation of the Network, MCI/IMDA proposes to introduce the new Sections 39A to 39K which, among others, set out penalties for any person who commits offences such as:
  - a. Removing, destroying or damaging the public parcel locker infrastructure and its related installations;
  - b. Unlawfully operating or using a parcel locker at or on any specified premises;
  - c. Intentionally obstructing the public parcel locker network operator from carrying out its duties;
  - d. Fraudulently retaining, disposing, removing or damaging any parcel placed in the Network; and
  - e. Placing any item, including prohibited items, in the Network that may be hazardous or considered offensive.
28. Accordingly, MCI/IMDA proposes to amend Section 47(3) so that the new Sections 39B, 39E, 39I(1), 39J and 39K are deemed to be arrestable offences within the meaning of the Criminal Procedure Code (Cap. 68).

**Question 3: Please provide views and comments on the proposed amendment of Sections 46 and 47(3), and the inclusion of the new Sections 23U, 39A to 39K, 48B and 48C of the PSA to provide IMDA with the powers to enforce and penalise offences relating to the Network.**

### **Procedures for appeal to the Minister in relation to the Postal Authority's decision on the Network**

29. Today, any person who is aggrieved by the Postal Authority's decisions or directions under the relevant sections may appeal to the Minister under Section 56 of the PSA. Accordingly, MCI/IMDA proposes to expand Section 56 to include an appeal procedure for any person (other than the public parcel locker network operator) who is aggrieved by the Postal Authority's decisions, codes of practice and/or directions made in relation to the Network.



**Exclusion of liability of public parcel locker network operator**

30. MCI/IMDA proposes to expand the scope of Section 57 so that the public parcel locker network operator is not liable in respect of any injury, loss or damage suffered by any person by reason of the act or default of another person, or an accident or other cause beyond the control of the public parcel locker network operator. These include:
- a. Any loss or delay of or damage to any parcel that is placed in any public parcel locker;
  - b. The inability to use, or any interruption, suspension or restriction of the use of, a public parcel locker; and
  - c. Any loss of secrecy in communication arising from the use of a public parcel locker.

**Exemption of the Network from distress**

31. MCI/IMDA proposes to expand the scope of Section 58 to exempt the Network from distress and state that it is not liable to be taken in execution under any process of a court in any bankruptcy or insolvency proceedings against any person, without the prior written approval of the Minister. This is to ensure that the policy intent of the provision of the Network as mentioned in paragraph 10 can continue to be met.

**Regulations in relation to the Network**

32. MCI/IMDA proposes to expand the scope of Section 61 to empower the Postal Authority to be able to make regulations in relation to the installation, operation and maintenance of the Network, with the Minister's approval.

**Question 4: Please provide views and comments on the proposed expansion of scope in relation to the Network in Sections 56, 57, 58 and 61 of the PSA.**

**PART IV: CLARIFICATIONS AND ENHANCEMENTS TO STRENGTHEN OVERSIGHT OF THE POSTAL SECTOR**

33. MCI/IMDA has also taken the opportunity to review other sections of the PSA. In this regard, the following proposals are intended to provide greater clarity or serve as administrative amendments to the PSA to strengthen regulatory oversight of the postal sector.

**Require PPL to provide wholesale access, and Postal Authority to regulate such access, for delivery of non-letters to letter boxes**

34. Today, only the PPL has access to masterdoor keys to the letter boxes, due to its Universal Service Obligation (**USO**) to deliver letters to all addresses in Singapore. Hence, the PPL has a much more extensive last-mile reach compared to other logistics service providers as it is able to deliver small non-letter items into letter boxes.
35. IMDA had considered allowing open access to letter boxes to level the playing field for the delivery of non-letter items into letter boxes. Methods to enable open access could include the duplication of masterdoor keys and installation of smart locks on masterdoors to regulate access. However, we note that giving multiple parties access to the masterdoors of letter boxes may give rise to mail security and/or integrity issues.
36. Instead of allowing open access, MCI/IMDA proposes to make clear that the Postal Authority has the powers to require the provision of, and regulate wholesale access for, the delivery of non-letter items (e.g. small packets/parcels) into letter boxes by the PPL (see new Section 7A and amendments to Section 8). This complements the PPL's existing requirement to provide wholesale access for the delivery of letters into letter boxes at regulated prices.
37. MCI/IMDA views such regulation of wholesale access for the delivery of non-letter items to letter boxes as necessary and complementary to the introduction of the Network. Many of the non-letter items that are delivered into letter boxes are small, low-value items not sent under a tracked service (i.e. the status of items along the delivery chain is not tracked, and the recipients' contact numbers are not provided by the sender, so it is not possible to trace the items or notify recipients to collect the items). In contrast, the Network will allow for the delivery of larger, tracked items. Such regulated wholesale access will level the playing field for other logistics service providers and enhance competition in the last-mile delivery services market by extending letter box access for the delivery of non-letter items at regulated terms and conditions. This will help to further close the last-mile infrastructure gaps between the PPL and other logistics service providers for parcel delivery.

**Extend the obligation of letter box provision and its maintenance to building owners**

38. Currently, Section 16(3) of the PSA requires building developers to provide letter boxes when new buildings are being built. The provision is silent on who should install additional letter boxes or replace them after a building has been transferred to the building owner by the developer, or when letter boxes in a building have been damaged beyond repair.
39. MCI/IMDA is proposing legislative amendments to make it clear that building owners (including town councils and management corporations strata title, or MCSTs) have an ongoing obligation to provide and maintain letter boxes when they have taken over ownership or control from the building developers<sup>6</sup>, to ensure that the delivery of letters is not disrupted (see amendments to Section 16).

**Grant the Postal Authority powers to exempt any person or class of persons from letter box provision**

40. Currently, any deviations from the requirement to provide letter boxes require the Minister's approval under Section 60 of the PSA. MCI/IMDA proposes to include the new Section 17 of the PSA to grant the Postal Authority powers to grant exemptions to any person from the requirement to provide letter boxes under Section 16(3), as such exemptions are operational in nature. This would include instances such as single-tenant buildings seeking exemption to not install letter boxes due to security reasons.

**Question 5: Please provide views and comments on the proposed amendment of Sections 8 and 16, and the inclusion of the new Sections 7A and 17 of the PSA on the regulation of letter boxes.**

**Enhancing enforcement powers under the PSA**

41. Today, the Minister may issue a direction to the Postal Authority or postal licensees which may be for purposes related to public emergencies, public security, national defence, foreign relations or the public interest. However, the PSA currently does not spell out the consequences for breaches of directions given by the Minister under Section 45 of the PSA. MCI/IMDA proposes to amend Section 45 to make clear that a breach is an offence, and to set out the penalty framework for contravening the Minister's directions, which will be capped at \$1 million, similar to the existing cap under the PSA for contravening a direction by IMDA.

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<sup>6</sup> Developers are still required to provide letter boxes prior to the change of ownership and/or control of the common property.

42. MCI/IMDA also proposes that the intentional use of unlawful postal services (i.e. postal services that are non-compliant with PSA provisions) should be an offence. This is to prevent the proliferation of unlicensed postal services. Accordingly, MCI/IMDA proposes to add the new Section 33A, and amend Sections 48 and 48A to expand the powers of search and arrest and the disposal of letters in respect of offences under Section 33A. The penalty for the contravention of the new Section 33A would be pegged to the existing General Penalties section (Section 52), i.e. any person found guilty is liable on conviction to a fine not exceeding \$10,000 or to imprisonment for a term not exceeding 3 years, or to both.
43. MCI/IMDA also proposes to repeal the current Section 55 on offences by bodies of persons, and substitute it with the new Sections 55 and 55A on offences by corporations and offences by unincorporated associations or partnerships. This is merely to update these sections to the current standard provisions dealing with the liability of a director/manager/secretary of a legal person (e.g. a company) that commits an offence under the PSA or its regulations.

**Exclude messenger services and intra-organisation mailroom service (multiple premises) from the licensing framework**

44. Today, the conveyance of letters from one place to another is licensable under Section 6 of the PSA, and such providers would therefore require a Postal Services Operator (**PSO**) licence. This would include the provision of messenger service<sup>7</sup> and intra-organisation mailroom services (multiple premises). The services provided by a messenger are viewed as more of an ancillary business support service for a niche group of customers, as compared to the provision of end-to-end public postal services. Mail collected by a messenger continues to be placed into the postal networks of licensed PSOs for onward processing and delivery. With regard to intra-organisation mailroom services, notwithstanding that they might involve the conveyance of letters between members of one organisation situated in different geographical locations, such services are carried out within the same organisation, and can be deregulated to provide clarity, allow more business flexibility, and reduce the regulatory compliance cost for the industry. Hence, MCI/IMDA proposes amending Section 5 of the PSA to provide regulatory clarity that these mailroom services do not infringe upon IMDA's exclusive privilege and are to be excluded from licensing<sup>8</sup>.

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<sup>7</sup> 'Messenger service' is defined as "the collection and processing of outgoing local and international mails from an organisation, followed by the subsequent forwarding of such mails to the postal licensee for delivery to the intended recipients via its postal network".

<sup>8</sup> The provision of inter-organisation mailroom service (i.e. involving mail exchanges between related or affiliated entities) shall remain licensable under the PSA.

**Clarifying that the remittance of money and postage stamps are to be provided only by a designated PPL**

45. Currently, Sections 11 and 19 of the PSA refer to the role of a PPL in the remittance of money and postage stamps. The current phrasing has been adequate as there is only one PPL. However, this could potentially be ambiguous if more than one party is appointed as a PPL and are interested in the same roles. MCI/IMDA proposes amendments to Sections 11 and 19 to make clear that the right to remit money and the right relating to postage stamps only apply to designated PPLs as approved by IMDA. As a consequence of the proposed amendments to Section 11, amendments to Section 34 are also proposed.

**Remove instances where the Postal Authority is required to publish a notice before an approved code of practice or standard of performance can take effect**

46. MCI/IMDA proposes to delete Section 24(5) of the PSA to remove these requirements for publicity or publication in the PSA for operational flexibility and expediency. Operationally, IMDA will continue to engage postal licensees and affected parties on any changes to the approved codes of practice or standards of performance before any new or amended codes take effect.

**Question 6: Please provide views and comments on the proposed amendment of Sections 5, 11, 19, 34, 45, 48, 48A, 55 and 55A, the inclusion of the new Section 33A, and deletion of Section 24(5) of the PSA as described above.**

**PART V: PROCEDURES AND TIMEFRAME FOR SUBMITTING COMMENTS**

47. MCI/IMDA would like to seek views and comments from the industry and members of the public on the above issues and questions.
48. Respondents should organise their submissions as follows:
  - a. Cover page (including their personal/company particulars and contact information);
  - b. Table of contents;
  - c. Summary of major points;
  - d. Statement of interest;
  - e. Comments; and
  - f. Conclusion.

Supporting materials may be placed as an annex to the submission.

49. All submissions should be written clearly and concisely and should provide a reasoned explanation for any proposed revisions. Where feasible, respondents should identify the specific provision of the PSA which they are commenting on, and explain the basis for their proposals.
50. All submissions should reach MCI/IMDA within 3 weeks, no later than **23 December 2020, 6 p.m.**. Respondents are to adhere to this timeline, and late submissions will not be considered. Submissions are to be in soft copy only (in Microsoft Word or PDF format). Please submit your soft copies, with the email subject “**Public Consultation on the Review of the Postal Services Act [submitter’s name for individuals’ views/organisation name for organisations’ views]**”, to: **PostalRegulation@mci.gov.sg**
51. MCI/IMDA reserves the right to make public all or parts of any written submission and to disclose the identity of the source. Respondents may request confidential treatment for any part of the submission that the respondent believes to be proprietary, confidential or commercially sensitive. Any such information should be clearly marked and placed in a separate annex. Respondents are also required to substantiate with reasons any request for confidential treatment. If MCI/IMDA grants confidential treatment, it will consider, but will not publicly disclose, the information. If MCI/IMDA rejects the request for confidential treatment, it will return the information to the respondent that it submitted and will not consider this information as part of its review. As far as possible, respondents should limit any request for confidential treatment of information submitted. MCI/IMDA will not accept any submission that requests confidential treatment of all, or a substantial part of, the submission.
52. For the avoidance of doubt, all the information provided and views expressed in this consultation paper are for purposes of discussion and consultation only. Nothing in this consultation paper represents or constitutes any decision made by MCI/IMDA. The consultation contemplated by this consultation paper is without prejudice to the exercise of powers by MCI/IMDA under the PSA or any subsidiary legislation thereunder.