

ON/REG/0412/0086

11 April 2012

**INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE (“IDA”)**

10 Pasir Panjang Road  
#10-01 Mapletree Business City  
Singapore 117438  
Via email: [IDA\\_ILO@ida.gov.sg](mailto:IDA_ILO@ida.gov.sg)

Attention: Ms Aileen Chia  
Deputy Director-General (Telecoms & Post)

Dear Ms Chia

**DIRECTION OF THE INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE  
UNDER SECTION 27 OF THE TELECOMMUNICATIONS ACT (CHAPTER 323) IN  
RESPECT OF THE REVIEW OF OPENNET PTE LTD’S INTERCONNECTION OFFER  
FOR THE PROVISION OF SERVICES OVER THE NEXT GENERATION NATIONWIDE  
BROADBAND NETWORK**

1. We refer to the following:
  - a) IDA’s Direction of 27 February 2012;
  - b) OpenNet’s Reconsideration Request dated 12 March 2012 (ref. ON/REG/0312/0038);
  - c) IDA’s letter dated 15 March 2012 (ref. IDA.INTC.05.0011);
  - d) OpenNet’s letter dated 20 March 2012 (ref. ON/REG/0312/0054);
  - e) IDA’s letter dated 23 March 2012 (ref. IDA.INTC.05.0011); and
  - f) OpenNet’s letter dated 28 March 2012 (ref. ON/REG/0312/0065).
2. OpenNet submits herein the proposed modifications to the following documents of the Interconnection Offer (“ICO”):
  - Schedule 1 – Residential End-User Connection
  - Schedule 2 – Non-Residential End-User Connection
  - Schedule 3 – NBAP Connection
  - Schedule 4 – CO to CO Connection
  - Schedule 5 – CO to Building MDF Room Connection
  - Schedule 6 – Building MDF Room to FTTB Node Connection
  - Schedule 7 – FTTB Node to DP Connection

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- Schedule 8 – Building MDF Room to Residential Premise Connection
  - Schedule 9 – Building MDF Room to Non-Residential Premise Connection
  - Schedule 10 – CO to NBAP DP Connection
  - Schedule 11 – NBAP DP to NBAP TP Connection
  - Schedule 12 – Co-Location Service
  - Schedule 12A – RL to RL Interconnection Service
  - Schedule 13 – Patching Service
  - Schedule 15 – Charges
  - Schedule 18 – Dictionary
3. Notwithstanding OpenNet’s submission herein which is in response to IDA’s Direction on 27 February 2012, and IDA’s rejection of OpenNet’s request to IDA to stay its Direction of 27 February 2012 pending a decision in respect of OpenNet’s Reconsideration Request of 12 March 2012 (ref. ON/REG/0312/0038), this submission by OpenNet does not constitute an agreement by OpenNet to support, implement or adopt the proposed modifications to the ICO as provided herein and we reserve all our rights to modify or vary the proposed modifications herein upon a final decision on OpenNet’s appeal against IDA’s Direction of 27 February 2012 following due process.
4. With regard to the Maximum Quota, OpenNet notes IDA’s comments in its letter of 12 March 2012 (ref. IDA.INTC.05.0011). Nonetheless, OpenNet would reiterate our request to IDA to consider favourably the proposal set out in our letter of 2 March 2012 (ref. ON/REG/0312/0029). As explained in our letter of 2 March 2012, under the said proposal, there will be an increased quota to meet the increasing demand for connections to Residential and Non-Residential end-users. In this respect, OpenNet had, in proposing the increased quota, complied with sub-paragraph 14(a) of the Explanatory Memorandum to IDA’s Direction of 27 February 2012 and considered the demand from end-users during the period prior to the Direction.
5. OpenNet’s proposal also incorporates a mechanism to allow for adjustments to the increased quota on an ongoing basis, as required under sub-paragraph 14(b) of the Explanatory Memorandum.
6. In its Direction of 27 February 2012, IDA also directed that – *“the mechanism should also ensure that orders for connections to Non-Residential end-users would still be fulfilled in a timely manner during such seasonal fluctuations”*. In OpenNet’s view, IDA’s directive will entail a differentiation of the type of work performed by our contractors, which is a key aspect of our proposal. In any case, we had on 12 March 2012 requested IDA to reconsider its decision to disallow differentiation by the type of premise or the type of provisioning work to be carried out. We would seek IDA’s favourable consideration of OpenNet’s Reconsideration Request of 12 March 2012.



7. In the draft schedules submitted herein, IDA will find two sets of drafting changes on Maximum Quota for its consideration. Version 1 does not differentiate by the type of premise or the type of provisioning work to be carried out, whereas the drafting under Version 2 is based on OpenNet's proposal of 2 March 2012.
8. In OpenNet's view, the proposed increased quota under Version 1, when combined with the seasonal increase in capacity (which will be made available on an as-needed basis), will be sufficient to cater to demand. This is supported by the fact that to date, the utilisation of the seasonal capacity increase by OpenNet had averaged at about 70 percent on a sustained basis. If this utilisation improves to 100 percent, potentially an additional 345 Requests would be processed per week. Notwithstanding this, OpenNet would reiterate our request for IDA's favourable consideration of the drafting proposed under Version 2, i.e. OpenNet's proposal as set out in our letter of 2 March 2012.
9. With regard to the fibre handover process, OpenNet would refer IDA to the revisions made under clause 20 of Schedule 1 of the ICO. OpenNet respectfully submits that while some of the comments received by IDA were valid, it is important that IDA should also consider the fundamental need to introduce a fibre handover process in reviewing OpenNet's proposed revisions.
10. OpenNet would reiterate that the provision of second fibre connections for end-users should not be for short-term, transitional use for convenience reasons. Significant costs and resources (including building and land resource) will have to be committed to the provisioning of second fibre connections on the Next Generation Nationwide Broadband Network ("NGNBN").
11. If the misuse of second fibre connections (e.g. for transitional use when end-users change from one service provider to another) are left unchecked, allowing fibre cables to be installed underground and in building infrastructure only to be used for a very short period of time relative to their economic lifespan, concerns will arise as to the efficiency and commercial viability of the NGNBN. Fibre assets will be left stranded shortly after they are provisioned for services; limited scarce resources such as telecom riser space and underground duct space will not be efficiently utilised. OpenNet submits that the proposed fibre handover process would appropriately address these concerns and we hereby request that IDA should consider the same favourably.
12. With regard to the implementation timeline for the Required Modifications, OpenNet envisages a three-stage implementation, as follows:
  - Stage 1: Deployment in [REDACTED]
    - Modification of end-user's contact details under Schedule 1
    - Change of appointment under Schedule 1
    - Modification of end-user's contact details under Schedule 2
    - Periodic status updates on provisioning under Schedule 1 & Schedule 2 services

- **Stage 2: Ready for testing with Requesting Licensees by [REDACTED]**
  - Relocation of Termination Point (“TP”) within same premise, Repair & Removal
  - Modification of end-user’s installation address under Schedule 2
  - Accepting additional contact persons under Schedule 2
  - Modification of end-user’s contact details under Schedules 3, 8, 9, 10 & 11
  - Periodic status updates on fault investigation for relevant schedules
  - Allowing Requesting Licensee to re-open a closed trouble ticket for relevant schedules
  - Change of classification of premise type under Schedule 1 & Schedule 2
  - Non-standard contract term for Non-Residential End-User & Non-Building Address Point (“NBAP”) Connections
  - Change of deactivation notification period for Schedule 1 & Schedule 2
  - Allowing cancellation of Requests due to service provisioning delay for Schedule 1 & Schedule 2
  - NBAP Enquiry Tool
  
- **Stage 3: Ready for testing with Requesting Licensees by [REDACTED]**
  - Relocation of TP from Premise A to Premise B
  - Second TP for Residential Premise
  - Express Service for Schedule 1 & Schedule 2
  - Allowing cancellation of NBAP Requests without charge
  - Switching of services from GPON to OE
  - Determining serving CO and MDF as part of feasibility check
  - Allow Requesting Licensee to download Service Report Form
  - Provision of evidence upon requested by Requesting Licensee on obstruction cases
  - Periodic status updates on provisioning under Schedules 3 to 12A
  - Fibre Takeover Process
  - Changes required under Schedule 12
  
- The above timelines are indicative and are subject to changes. Depending on the date of finalising and approval of the respective schedules, the indicative timelines will be adjusted accordingly. Further, in the event that the finalised and



approved schedules deviate from OpenNet's proposed modifications, OpenNet will assess the impact of the changes and inform IDA of the revised timelines as appropriate.

13. In addition, in view that the Required Modifications will require corresponding changes to the OpenNet Platform Application Programming Interface, OpenNet would request that the said changes be exempted from the change management process set out under Schedule 14 (OSS/BSS Connection & Professional Services) of the ICO and shall not be subject to Requesting Licensees' acceptance. Requesting Licensees shall bear their own costs in having to modify their respective systems to support the Required Modifications directed by IDA.
14. OpenNet hereby requests a meeting with IDA to discuss the proposed modifications and implementation timelines provided in this submission. In particular, we would like to discuss with IDA the revised fibre handover process and our comments on this matter provided herein.
15. Please do not hesitate to contact the undersigned if IDA should require any clarification on this submission.

Thank you.

Yours sincerely,



Lee Khoon Aik  
Director (Regulatory & Interconnect)  
OpenNet Pte Ltd

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