

**M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON
INTERCONNECTION OFFER FOR THE PROVISION OF SERVICES
ON THE NEXT GENERATION NATIONWIDE BROADBAND
NETWORK ("NEXT GEN NBN") -
OPENNET PTE LTD PROPOSED MODIFICATIONS**



This paper is prepared in response to IDA's consultation document dated 18 April 2012 and represents M1's views on the subject matter. Unless otherwise noted, M1 makes no representation or warranty, expressed or implied, as to the accuracy of the information and data contained in this paper nor the suitability of the said information or data for any particular purpose otherwise than as stated above. M1 or any party associated with this paper or its content assumes no liability for any loss or damage resulting from the use or misuse of any information contained herein or any errors or omissions and shall not be held responsible for the validity of the information contained in any reference noted herein nor the misuse of information nor any adverse effects from use of any stated materials presented herein or the reliance thereon.

ANNEX 1: M1'S RESPONSE TO IDA'S CONSULTATION PAPER ON INTERCONNECTION OFFER FOR THE PROVISION OF SERVICES ON THE NEXT GENERATION NATIONWIDE BROADBAND NETWORK ("NEXT GEN NBN") – OPENNET PTE LTD PROPOSED MODIFICATIONS

Description	Views/Comments
<p>OpenNet's Proposed Maximum Quota</p>	<p>While it is important to increase the Maximum Quota to meet market demand, it is also imperative that OpenNet be able to meet the Service Activation Period ("SAP") i.e. three (3) business days for Residential Orders and ten (10) business days for Non-Residential Orders. Both factors should be taken into consideration in OpenNet's resource planning.</p> <p><u>Version 1:</u> We note that IDA allows OpenNet to propose a daily quota provided that it is <u>substantially better</u> than the current weekly quota system. However, OpenNet's proposed 500 requests per day is only a mere increase of 20 orders from the original 480 daily limit. Based on current trends, this is not likely to be adequate to meet the Requesting Licensees' ("RLs") daily requests.</p> <p><u>Version 2:</u> Maximum Quota per day should not be apportioned based on the different "Types of Work", as this would unnecessarily restrict the ability for RLs to fully utilise the Maximum Quota provided. It also does not resolve the shortfall issues faced currently. Instead, we propose that RLs be given the full flexibility to utilise the available slots across the different "Types of Work".</p> <p><u>Adjustments Mechanism:</u> With the current situation of provisioning generally lagging demand for connections, we are of the view that the proposed quarterly review of the quota is too long. We would suggest a shorter review period of eight (8) weeks and a lower usage rate of 90%. This will improve response and prompt adjustments to meet market demand.</p> <p>In the OpenNet's proposed mechanism, the increase in quota is not clearly defined. This can perhaps be addressed by a proposed formula e.g. to increase the daily quota to the highest achieved within the last eight (8) weeks.</p>

<p>OpenNet's Proposed Seasonal Slots</p>	<p>OpenNet's proposed increase and the terms and conditions of seasonal slots are not defined in the OpenNet's Interconnection Offer ("ICO") e.g. whether there will be charges imposed for the seasonal slots or if the increase in seasonal slots will be adequate to meet the seasonal increase in demand during major fairs.</p> <p>Since major fairs are mainly targeting Residential customers, we would expect the take-up rate for Residential to be higher than Non-Residential requests. To ensure that there will be slots available for Non-Residential requests, we suggest to have a separate sub-quota in the Seasonal Slots for Non-Residential Premise Installation. However, similarly to maximise the quota provided, any un-utilised Non-Residential slots should be open up for Residential Orders.</p>
<p>Building Owners</p>	<p>We support IDA's Directed Modifications that OpenNet must demonstrate that it has exhausted its efforts in attempting to resolve issue/obstruction with building owners/management or customer before rejecting a request. Rejection of residential and non-residential orders due to building owner/management's refusal should not be accepted as a reason for failure of service delivery since access is mandated under the Telecommunications Act (Chapter 323) ("Act"). Instead, OpenNet should refer such refusal to the IDA to enforce compliance with the Act.</p>
<p>Charges (Schedule 15)</p>	<p>Residential and Non-Residential End User Connection: Relocation Service Charge of S\$67.52 under Clause 1.17.1 and 2.15.1 should already have included all necessary action by OpenNet to relocate the service. There should not be any additional charges for deactivation of patching services at Central Offices ("CO") or MDF Room.</p> <p>Notwithstanding the above, if OpenNet is to charge for patching service, we propose that the deactivation/removal of the Patching Service in the MDF Room be S\$80 i.e. S\$30 for contractor to patch the cable and S\$50 for transportation.</p> <p>NBAP Connection: In Clause 3.3.2, the "Cost-Oriented Basis" charged is not clearly defined. This pricing should not be based on a single pricing passed on by a single contractor.</p>

<p>Cancellation of Orders</p>	<p>M1 propose that Requesting Licensees (“RLs”) be allowed to cancel orders without any cancellation charge under the following conditions:</p> <ul style="list-style-type: none"> • When the undue delay is more than three (3) business days from the date of request for residential end user connection; and • When the end-user requests for a cancellation five (5) business days before the request-for-service (“RFS”) date. <p>For cases where there is a basic error in data submission e.g. address error, RLs should be allowed to notify OpenNet of such error at least three (3) business days before the RFS date without incurring any cancellation charge. In the event where RLs notify OpenNet of the errors within the three (3) business days before the RFS date, RLs should only incur a modification charge instead of the full cancellation charge.</p>
<p>Verification and Notification process with the RLs</p>	<p>Where RLs are to make the necessary corrections in the OpenNet Platform, M1 suggest that the RLs be notified at least one (1) business day before the RFS date to make the necessary corrections and to give sufficient time to inform the end users of such changes.</p>
<p>Insufficient Capacity from CO to the First TP</p>	<p>When there is a notification from OpenNet on insufficient capacity, we propose that the RL be allowed to make the changes within three (3) business days through OpenNet Platform to allow sufficient time for the RL to liaise with end user on the changes.</p>