

April 9, 2013

Office of the Communications Authority  
29/F Wu Chung House  
213 Queen's Road East  
Wan Chai  
Hong Kong

*By fax: 2803 5112*

Dear Head of Economic Analysis and Research:

**Worries of a heavy data user**  
**In support of Option 1**

I am writing to express my worries on the possible consequences on me, as a high-volume mobile data user, if the Government disregards our preference to renew 3G spectrum licences for incumbent 3G operators.

Few people will disagree with me that Hong Kongers enjoy advanced telecom services that come with rather low tariff plans. We feel the pinch when switching to a new operator while studying overseas or working abroad. Despite some teething problems on customer service or sales practices, I do not have much to complain about our local telecom services, and would like to maintain the status quo and prevent it from being interrupted simply because the Government wants to be fair to a single mainland China-based operator.

Fairness is important and highly valued. However, public interest should override when it comes to the interest of each and everyone in Hong Kong. I am particularly concerned about any possible service interruption or degradation like drop calls and higher prices if those 3G operators fail to retain their 3G spectrum and are compelled not to innovate or provide competitive service offerings.

I believe that unlimited data plans (UDP) are most susceptible to cancellation if incumbent 3G operators lose part of their 3G spectrum. It will be a good excuse for them to scrap UDP as they have to avoid users' excessive use of their scarce network capacity and network congestion caused by 'unlimited' data usage.

In fact, UDP are no long 'unlimited' as a cap has been imposed on data plans since the Fair Usage Policy came into effect. Yet, we are still able to enjoy UDP! However, I doubt if those operators would still refrain from scrapping UDP or tariff increase if they need to pull all resources together to fight another battle on acquiring additional spectrum once the Government decides to take way part of or all of their 3G spectrum.

Why upset the present market equilibrium when new competitors can enter the market through other means if they are so keen to furnish Hong Kong people with more choices?  
No mobile users would like to become innocent victims of the battle on 3G spectrum between the incumbent 3G operators and any new entrants.

Sincerely,

Eric Pang