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10<sup>th</sup> April 2013

Office of the Communication Authority  
29/F., Wu Chung House,  
213 Queen's Road East,  
Wanchai, Hong Kong

Attention: Head of Economic Analysis and Research

Consultation Paper for  
Arrangements for the Frequency Spectrum in the 1.9-2.2 GHz Band upon Expiry of the  
Existing Frequency Assignments for 3G Mobile Services

Dear Sirs / Madam,

We, BeSpark Technologies Engineering Limited, are a leading construction and maintenance service provider for mobile network and system equipment of existing local 3G mobile services operators in HKSAR.

We, as a mobile network construction and maintenance sub-contractor for more than 20 years in Hong Kong, would like to share our views and concerns on the proposed arrangements for the utilized 3G spectrum as follows:

- Option 1 is the best for end-users and 3G operators.
- Re-auctioning of utilized 3G spectrum will result in substantial decline in service quality for end-users due to reduced network capacity of individual 3G operators.
- Re-auctioning of utilized 3G spectrum will also result in waste of well-functioning equipment and facilities.
- OFCA should release more spectrum for auction instead of focusing on utilized spectrum in order to avoid any possible service degradation and inconvenience to the public.
- As a construction and maintenance sub-contractor for the existing 3G operators, we have invested millions of dollars in testing equipment and training for competent persons based on their network capacity and the government's consistent policy in the past. Re-auctioning of utilized 3G spectrum will force us to write off quite a lot of our invested equipment and forced lay-off of a lot of our workers due to reduced demand of individual 3G operators. Obviously, it will lead to uncertainties in the mobile industry in Hong Kong.

Thank you for your kind attention.

For and on behalf of  
BESPAK TECHNOLOGIES ENGINEERING LIMITED



Mr. Wong Ping Kuen  
Managing Director



PKW/KC/CPC



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