

From: Pro Bike Center Ltd
To: The Office of the Communications Authority
Date: 10 April 2013

**Comments on Arrangements for the Frequency Spectrum in the
1.9 – 2.2 GHz Band upon Expiry of the Existing Frequency
Assignments for 3G Mobile Services**

We refer to the extensive media coverage recently on the above subject, and are concerned that the Government is proposing to adopt proposals which will not just result in poorer quality of service, but may also result in higher prices for customers.

Having read the Government's Consultation Paper, we cannot understand why the Government's conclusion is to take away a third of the mobile operators' spectrum allocation. The Government's analysis seems to point in the opposite direction. In particular, the Government has said that its proposal will disrupt services to customers, but has given no convincing explanation of any benefits which would justify this disruption.

Furthermore, the Consultation Paper says that customers are expected to move to different mobile operators following the spectrum sale as they suffer from poorer service quality. We should be choosing operators because of improvements in service, not because of a Government-created a worsening of service! This is a ridiculous thought process!

If the real purpose is to generate extra revenue from the mobile operators (the cost of which customers may ultimately have to bear in some form), or to 'engineer' the entry of China Mobile as a 3G network operator (or both), the Government should say that this is the case, so we can have an open and transparent consultation process.

For and on behalf of,
PRO BIKE CENTER LIMITED
專業單車中心有限公司

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Authorized Signature(s)