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Submission of Consultation Paper of Arrangements for the Frequency Spectrum in the 900MHz and 1800MHz Bands upon Expiry of the Existing Assignments for Public Mobile Telecommunications Services and the Spectrum Utilization Fee

Dear Sirs

HUBER+SUHNER, is a global company develops and manufactures components and system solutions for electrical and optical transportation of data and energy, would like to share our views here in respect of the arrangement for the frequency spectrum of 900MHz and 1800MHz bands upon expiry.

Our views are derived from our consideration on the long-term development of the Telecommunications industry in Hong Kong and HUBER+SUHNER believes that, Option 1 "Right of first refusal to be offered to the incumbent operators" should be the best choice for the telecommunications industry in Hong Kong due to the following reasons:

1. Optimized networks assures customers service continuity
 - a. Existing mobile networks have been developed and optimized for years that assures network quality and services continuity
 - b. Expected services quality facilitates the choice of telecom services by end users
2. Huge spectrum utilization fee (via auction) incurred by telecom operators results in
 - a. investing less in the mobile networks that will degrade and slow down the development and improvement of mobile networks services and quality
 - b. charging high subscription fee for telecom services
 - c. Limiting the variety of choice of telecom services offered
3. Investment shall focus on providing telecom services in new infrastructures projects rather than paying high spectrum utilization fee
 - a. Coverage/services expansion to provide uninterrupted telecom services in coming major infrastructures projects such as
 - i. New MTRC lines
 - ii. Expansion projects of Airport
 - iii. West Kowloon cultural district
 - b. Enhancing the capacity and data through put rate of the mobile networks.

I hope our views on the subject make some meaningful contribution to your consideration.
Thank you for your attention

Yours sincerely


Timmy M.T.I.P.