



**Response of Consultation Paper related to Arrangements for the Frequency Spectrum in the 900MHz and 1800MHz Bands upon Expiry of the Existing Assignments for Public Mobile Telecommunications Services**

King Tin Engineering & Transportation Limited is a local telecommunication contractor company and would like to share our views with respect to the arrangement for the frequency spectrum of 900MHz and 1800MHz bands upon expiry.

Our views are 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:

- Mobile Operators can exercise their rights to renew their existing frequency spectrum upon expiry so that they do not need to invest extra money to remove or modify their existing and well-functioning mobile networks which have been developed and built for past years.
- Instead of putting wasted resources in modifying the existing networks for shuffling the frequency spectrum that are likely to be happened in case of option 2 and option 3 take place, Mobile Operators can put more resources and investment focusing on the coverage expansion of coming infrastructure projects such as new MTRC lines as well as the implementation of prevailing generation of mobile services.
- Without the certainty of keeping the frequency spectrum upon expiry, Mobile Operators could become reluctant to continue investing to maintain the same quality of services and introduce more innovative technology for mobile communication from now till the end of expiry that will be in year 2020/2021.
- Assuming Mobile Operators will renew its frequency spectrum upon expiry, mobile service continuity and quality assurance can be maintained and offered to end users. In other words, if option 2 or option 3 take place, there will be a transition period of adding/removing/modifying their respective networks and definitely impact the offered mobile services to end users



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I sincerely hope you will find the above views meaningful and helpful on the subject.  
Thank you for your attention

King Tin Engineering & Transportation Limited



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