



15 Mar 2017

Mr. Gregory So, GBS, JP  
Secretary for Commerce and Economic Development  
Commerce and Economic Development Bureau  
21/F, West Wing, Central Government Offices  
2 Tim Mei Avenue  
Tamar  
Hong Kong

Mr. Ambrose Ho  
Chairman, Communications Authority  
Office of the Communications Authority  
29/F, Wu Chung House  
213 Queen's Road East  
Wanchai  
Hong Kong

Dear Mr. So and Mr. Ho,

### **Opinions concerning the Mobile Spectrum and Services of Hong Kong**

On February 14, 2017, the HKSAR Government published the Second Consultation Paper regarding the captioned. We also read the open letters and white papers which HKT has sent to the HKSAR Government since December 2016. The captioned does raise concerns to our company. Mobile services and solutions are now a critical part of our operations. We are transforming our business models to utilize mobile applications and solutions in our communications and operations. As such, we are heavily reliant on access to reasonably priced and advanced mobile telecommunications services to conduct our daily business.

Therefore, our company is particularly concerned that:

- **We will be paying higher prices for mobile services in the future if the HKSAR Government increases spectrum charges when the spectrum currently used by the mobile operators is re-assigned in 2020/2021.**

Higher mobile prices will increase our operating expenses, making us less competitive locally and across the region. Furthermore, we understand that the spectrum charges proposed by the HKSAR Government are much higher than the charges levied by governments in other countries. That would imply that part of these costs may be transfer to users. In addition, we believe the extra revenues received by the HKSAR Government are not immediately going to be re-allocated and benefit the local business community. In view of the headwinds among local and global economy, we believe any financial resources should be managed cautiously and stay within the business community. We would urge the HKSAR Government not to increase the spectrum charges.




- **The Government has not released enough spectrums to enable the development of advanced mobile telecommunications services and solutions, such as 5G and Internet of Things (IoT). This will have a devastating effect on consumers and businesses.**

Having access to fast, state-of-the-art mobile services and solutions is extremely important for consumers and for enterprises in Hong Kong. In addition, we believe the availability of more spectrums can encourage technology start-ups and innovation gurus to leverage such platforms for exciting technology development. We are positive that we can take advantage of these developments in our businesses and/or operations. Given other countries are far ahead of Hong Kong in terms of making more spectrum available for mobile services development, we would here urge the HKSAR Government to find ways of releasing more spectrum to mobile operators immediately.

Certainly, your policies will have a significant impact on us as local investors, local employers and local businesses. Our company would be grateful if you, as the leaders of the HKSAR Government, can seriously take into account our views as you formulate the plans regarding the forthcoming spectrum re-assignment exercise and the release of future spectrum.

Thank you for your kind attention. We look forward to your positive response.

Yours sincerely,

  
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Kent Tse  
Finance Manager

