

HUBER+SUHNER (HONG KONG) LTD Hong Kong

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Submission of Second Consultation on Arrangements for the Frequency Spectrum in the 900MHz and 1800MHz Bands upon Expiry of the Existing Assignments and the Spectrum Utilization Fee

## TO WHOM IT MAY CONCERN

HUBER+SUHNER as 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 its expiry.

Our views are derived from our consideration on the long-term development of the Telecommunications industry in Hong Kong. HUBER+SUHNER believes that the high Spectrum Utilization Fee (SUF) will negatively impact for the telecommunications industry in Hong Kong due to the following reasons:

- 1. High SUF discourages the long term investment by mobile network operators resulting in:
- a. degrading and slowing down the deployment and upgrading of mobile networks services and quality
- delaying or not deploying innovative and advanced technology
- c. charging high subscription fee for telecom services
- d. limiting the variety of service offers of telecom services
- 2. The only beneficiary of high SUF might be the HKSAR Government, but at the expense of industry and public's interests
- 3. Decrease in opportunities of employment in the ICT industry
- Higher data plan charges by mobile network operators will hinder the usage and development of APP and mobile commerce in Hong Kong



We hope our views on the subject provides some meaningful contribution to your consideration. Thank you for your attention,

HUBER & SUHNER (HK) CO., LTD. Yours sincerely

Timmy M. I. Ip