

**The Views and Comments of China Mobile Hong Kong Company Limited  
("CMHK")**

**to**

**Consultation Paper**

**of**

**Arrangements for the Frequency Spectrum  
in the 850 MHz Band upon Expiry of the Existing Assignment for Public Mobile  
Telecommunications Services and the Related Spectrum Utilisation Fee  
Issued on 19 August 2020**

Date: 13 October 2020

**Question 1: Do you have any views on re-assigning the spectrum in the 850 MHz Band through an auction open for all interested parties?**

CMHK: CMHK agrees with re-assigning the spectrum in the 850 MHz Band through an auction open for all interested parties.

**Question 2: Do you have any views on the proposed re-assignment of the spectrum concerned as a single frequency block of bandwidth of 2 x 7.5 MHz?**

CMHK: CMHK agrees with the proposed re-assignment of the spectrum concerned as a single frequency block of bandwidth of 2 x 7.5 MHz.

**Question 3: Do you have any views on the proposed format and timing of the auction?**

CMHK: CMHK agrees with the proposed format of the auction. To facilitate the overall network planning with new Sub-1GHz spectrum allocation by OFCA, CMHK proposes that 850 MHz and 600/700 MHz bands will be assigned by way of a single auction.

**Question 4: Do you have any views on the adoption of a technology neutral approach for the use of spectrum in the 850 MHz Band in any new assignment which follows the expiry of the existing assignment?**

CMHK: CMHK agrees with the adoption of a technology neutral approach.

**Question 5: Do you have any views on the proposed network and service rollout obligations, as well as the proposed imposition of a performance bond on the successful bidder?**

CMHK: CMHK agrees with the proposed network and service rollout, as well as the proposed imposition of a performance bond on the successful bidder.

**Question 6: Do you have any views on the proposed arrangement in relation to SUF above?**

CMHK: The reserve price should be set at a reasonable level, both to reflect the current economic condition, to leave much room to the 5G players to develop more 5G

applications and to promote Hong Kong as a smart city.

To allow even more financial flexibility, under the option of annual SUF instalment payment, CMHK proposes to give the spectrum assignee a choice to pay off the then outstanding SUF after the 1<sup>st</sup> assignment year.