

Attn: Senior Telecom. Controller
(Competitive Services) (fax: 28035112)
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Dear Sirs,

Licensing Framework for Third Generation Mobile Services: an Industry Consultation Paper

I have in the Telecommunications Users and Consumers Advisory Committee (UCAC) and on other occasions stressed the importance of considering the impacts of third generation mobile services, apart from the technical issues (mostly on standards and frequency spectrum) and licensing aspects. The latter are important but are only the main concerns of interested suppliers and service providers, not of users and consumers.

Impacts of 3G mobile services on lives at homes and at work will be significant, for the haves and havenots in the community. This consultation has not called for views from the demand side on fulfillment of end-user needs and multi-dimensional societal impacts. I hope that the forthcoming public consultation on future mobile services will fill this gap. The Government can in this way demonstrate that major societal policy decisions are based on holistic thinking, and concerted efforts of relevant government departments. I also believe that there will be more demand for 3G services if potential consumers can participate in policy making. The following points are therefore suggested for your consideration:

1. Impacts on homelives--on how to ensure that the disadvantaged will also have access to 3G services; on impacts of services such as teleshopping, learning, entertainment, etc. compared with fixed services
2. Impacts on worklives--on new opportunities and threats such as teleworking and homeworking, security, etc.
3. Economic impacts--on tariff policies for balancing affordability and return on investment; on different ways users can migrate from 2G to 3G services, including to what extent the existing mobile terminals can be used for an interim period while waiting for new versions or services. Regarding societal impacts, the possible reduction of road traffics, office rentals, etc. due to the growth of mobile offices
4. Environmental and health impacts--on possible reduction of pollution caused by road traffics; on international standards and ways to follow for reducing adverse impacts on human bodies due to radiation (the mass media coverage has generated a lot of concerns recently)

5. Free and fair competition--on new approaches to ensure such, learning from fixed and mobile competition in the past

6. Quality of services--now can be an opportunity to install new mechanisms for defining, monitoring, assessing and ensuring quality of service which has been a blurred area in the telecom sector. As wireless services usually experience more disruptions than fixed services, would users be informed of better performance pledges when they adopt 3G services?

7. Inter-government co-operation being planned to enhance consumer confidence--for tackling problems crossing national boundaries such as hacking, e-commerce, etc.

The following are my views on this consultation paper:

-Operator Selection Arrangement (para. 4.7+)--in general, I support Selection by Evaluation of the Merits of Applications, due to the possible demerits of the Spectrum Auctioning approach

-Similar Regulatory Framework (para 5.1+)--in general, I support policies made toward regulating 3G operators, 2G operators and fixed operators under a similar regulatory framework, and same licensing conditions

-Domestic Roaming between 2G and 3G Networks (para. 5.13+) and Mobile Numbering Portability (para. 5.19)--policies to encourage roaming are supported. The making of MNP policy should be closely linked to such; for example, can the 2G numbering beginning with digit '9' be retained when joining 3G services offered by existing or new network providers?

-Separation of Service Provision from Network Provision (para. 5.15+)--I believe that the merits of such policy will outweigh the demerits and therefore support such in general.

Yours sincerely,

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