

## **Telecommunications Regulatory Affairs Advisory Committee**

### **Minutes of the Twenty-Fourth Meeting Held on Monday, 19 December 2022 at 2:30 p.m. in OFCA Conference Room, 20/F Wu Chung House**

#### **Members Present**

##### *In Person*

Mr Sanda Cheuk	Office of the Communications Authority ("OFCA") ("Chairman")
Miss Elaine Hui	OFCA ("Secretary")
Mr Alex Wong	Communications Association of Hong Kong
Ms Sophia Yap	Hong Kong Broadband Network Limited / HKBN Enterprise Solutions Limited / HKBN Enterprise Solutions HK Limited ("HKBN")
Mr Henry Wang	Localised Wireless Broadband Service / Localised Wireless Broadband System (Private) / Public Radiocommunications Service / Wireless Internet of Things Licensees ("LWBS / LWBS (Private) / PRS / WIoT") as a group

##### *Web Conference Access*

Mr Michael Kan	Consumer Council
Ir Dr Philip Chan	The Hong Kong Institution of Engineers ("HKIE")
Mr Ben Li	The Institution of Engineering and Technology Hong Kong ("IETHK")
Mr Francis Fong	Hong Kong Information Technology Federation ("HKITF")
Ms Karen Mo	China Mobile Hong Kong Company Limited ("China Mobile")
Mr Karson Ng	China Telecom Global Limited

Ms Sarah Zhang	China Unicom (Hong Kong) Operations Limited (“China Unicom”) / Mobile Virtual Network Operators (“MVNOs”) as a group
Mr Kevin Chu	Hong Kong Telecommunications (HKT) Limited / PCCW-HKT Telephone Limited and Hong Kong Telecommunications (HKT) Limited / PCCW Global (HK) Limited (“HKT”) / Genius Brand Limited
Ms Juliana Wong	Hutchison Telephone Company Limited
Ms Katherine Kwok	HGC Global Communications Limited (“HGC Global”)
Mr Patrick Ng	NTT Com Asia Limited (“NTT”)
Mr Tin-Lun Or	SmarTone Communications Limited / SmarTone Mobile Communications Limited (SmarTone”)
Mr Hing-Wah Ngan	Towngas Telecommunications Fixed Network Limited
Mr Kenneth Lau	TraxComm Limited
Mr Tony Tsang	VNET Group Limited (“VNET”)
Mr Julian Chow	Unified Carrier (External Fixed Services) Licensees as a group
Ir Chi-Wah Tang	Hong Kong Police Force
Dr Justin Chuang	Ad Personam
Ms Katy Lau	Ad Personam
Dr Patrick Tsie	Ad Personam

### **In Attendance**

#### **In Person**

Mr Wilson S Lee	OFCA
Mr Desmond Young	OFCA
Mr Wilson CW Lee	OFCA
Ms Vera Chung	OFCA
Mr Penny Lo	OFCA

Ms Winnie Ng	OFCA
Mr Chris Leung	OFCA
Mr Tony Yeung	OFCA
Ms Sherrine Lo	OFCA
Mr Malcolm Leong	HKBN

*Web Conference Access*

Ir Ken Chan	HKIE
Mr Bruce Chan	IETHK
Mr Alex Kun	HKITF
Mr David Ho	China Mobile
Mr Kenneth Kwok	ComNet Telecom (HK) Limited (“ComNet”)
Mr Chau-Loi Li	Easy Tone Network Limited (“Easy Tone”)
Mr Alex Lai	Hong Kong Cable Television Limited (“HKCTV”)
Mr Gilbert Choy	HKT / Genius Brand Limited
Mr Eric Lee	SmarTone
Ms Irene Lau	LWBS / LWBS (Private) / PRS / WIoT as a group
Ms Pak-Sai Kwok	Hong Kong Police Force

**Observers**

*In Person*

Mr Tony Lam	External Telecommunications Services Operators (“ETS”) as a group
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*Web Conference Access*

Mr Francis Ko	Village Telephone Limited (“VTL”)
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**Members Absent**

Mr Dickson Ip	ComNet
Mr Jia Law	Easy Tone

Mr Larry Tam	Equinix Hong Kong Limited
Mr Lionel Kwok	HKCTV
Ms Haining Hu	Vodafone Enterprise Hong Kong Limited
Ms Clio Ip	VTL
Mr Chung-Ho Yuen	Services-based Operators Licensees as a group
Prof Yingjun Zhang	Ad Personam

The Chairman welcomed all Members for participation in the TRAAC for the new term of 2022 – 2024 either in person or via web conference access. He introduced the new attendees and gave a brief explanation of the role of TRAAC. He also welcomed representatives of member institutions who attended the meeting as observers.

### **Item 1 Confirmation of Minutes of Last Meeting**

2. The Chairman said that the draft minutes of the 23<sup>rd</sup> meeting had been circulated to Members for comments on 4 August 2022. With adoption of some textual amendments suggested by a Member, the minutes of the 23<sup>rd</sup> meeting were confirmed.

### **Item 2 Matters Arising**

3. The Secretary reported that the revised Accounting Manual (“AM”) was sent to those unified carrier licensees directed by the Communications Authority (“CA”) to implement accounting practices (“Reporting Parties”) for comments in September 2022 and no written comment was received. The Reporting Parties were notified in October 2022 the finalisation and implementation of the streamlined AM.

4. In regard to the proposed revision to the “*Code of Practice relating to the Use of Numbers and Codes in the Hong Kong Numbering Plan*” (“CoP for Numbers and Codes”), the Secretary reported that comments from licensees were currently under review and the industry would be advised of the finalised revision to the CoP for Numbers and Codes in due course.

5. The Secretary also reported that in July 2022, a circular letter was issued to all mobile network operators, MVNOs and class licensees for offer of telecommunications services registered for the offer of mobile services, informing them of the updated licensing arrangement for the implementation of the real-name registration requirements under the Telecommunications (Registration of SIM Cards) Regulation.

**Item 3      Proposed Update of the “Security Guidelines for Next Generation Networks” and “Code of Practice on the Operation and Management of Internet of Things Devices” (TRAAC Paper No. 4/2022)**

6. Mr Penny Lo briefed Members on the proposed update of the “*Security Guidelines for Next Generation Networks*” (“NGN Guidelines”) and the “*Code of Practice on the Operation and Management of Internet of Things Devices*” (“CoP for IoT devices”).

7. Mr Michael Kan enquired how the proposed published information on compliance status of different operators could be appropriately presented to enable consumers to compare the extent of their implementation of security measures and make informed consumption choices. Mr Gilbert Choy, Mr Kevin Chu and Ms Juliana Wong considered that given the sensitive nature of information on network security, it was not necessary to publish the status of individual operators’ compliance with the NGN Guidelines and the CoP for IoT devices as this might increase the risk of malicious attacks by hackers on their networks. Mr Kevin Chu added that consumers might not have the relevant knowledge to understand the published information for comparison of the security aspects of different telecommunications networks, and that they should have been assured of the security of the telecommunications services they subscribed to given that individual operator was required under its licence to provide a good, efficient and continuous service. Therefore, he considered that there was no need to publish the compliance status of operators on OFCA’s thematic webpage for information of the public so long as they would conduct regular health check and report their status of compliance with the relevant measures

and best practices to OFCA.

8. In response, Mr Wilson CW Lee advised that only the overall compliance status rather than the compliance checklists submitted by individual operators was intended to be published and that such information might help consumers make informed choice in choosing telecommunications services that would best fit their needs. The Chairman added that as the compliance status in respect of individual item of the compliance checklists would not be published, the potential risk of the malicious attacks by hackers on operators' networks should not be significant. Regarding the detailed publication arrangement, the Chairman and the Secretary said that OFCA would take into account views and comments from the industry and consumer group in considering the way-forward of the matter.

9. Concerning the applicability of the NGN Guidelines and the CoP for IoT devices, Mr Henry Wang asked whether the Airport Authority Hong Kong ("AA") would be subject to these regulatory requirements as it was currently holding an LWBS Licence for provision of private telecommunications services within the airport. Mr Wilson CW Lee replied that both the NGN Guidelines and the CoP for IoT devices should be applicable to AA in respect of its relevant networks and systems used for providing public telecommunications services. The Secretary added that if AA would make use of its networks to provide telecommunications services to other companies inside the airport (e.g. airline companies), it would fall within the scope of public telecommunications services and subject to the requirements set out in the NGN Guidelines and the CoP for IoT devices. The Chairman said that notwithstanding that an LWBS licensee might operate its networks for private use, provision of public telecommunications services was authorised under the LWBS Licence and it was also encouraged to comply with the relevant measures and best practices set out in the NGN Guidelines and the CoP for IoT devices.

10. In response to the enquiry of Mr Tin-Lun Or on whether OFCA would arrange further discussion on individual items of the checklists, Mr Wilson CW Lee replied that the NGN Guidelines and the CoP for IoT devices had been in place since 2010 and 2019 respectively, and most of the operators were familiar with the relevant security measures and best

practice therein. The Secretary pointed out that no new security measure or best practice was introduced in the checklists. The Chairman and Mr Wilson CW Lee said that if any operator had difficulties in completing the compliance checklists, it might approach OFCA for assistance.

11. The Chairman concluded that OFCA would circulate the draft revised NGN Guidelines and CoP for IoT devices to the relevant licensees after the meeting for comment, if any, within four weeks, by 16 January 2023. Taking into account the views and comments received, OFCA would finalise the revisions to the NGN Guidelines and the CoP for IoT devices for the CA's approval.

*[Post-meeting note: OFCA circulated on 19 December 2022 the draft revised NGN Guidelines and CoP for IoT devices to the relevant licensees for comment by 16 January 2023.]*

#### **Item 4      Proposed Guidelines for Telecommunications Operators for Reporting Network/Service Outages and Emergency Incidents (TRAAC Paper No. 5/2022)**

12. Mr Wilson CW Lee gave a presentation on OFCA's proposal to issue the "*Guidelines for Telecommunications Operators for Reporting Network/Service Outages and Emergency Incidents*" ("Proposed Guidelines") to formalise the reporting requirements under the existing "*Guidelines for Local Fixed, Mobile, and Services-Based Operators for Reporting Network and Service Outage*" and "*Guidelines for Cable-based External Fixed Telecommunications Network Services Operators and Internet Service Providers for Reporting Network and Service Outage*" (collectively "Existing Guidelines").

13. With reference to paragraph 7.2 of the Proposed Guidelines, Mr Gilbert Choy considered that it was not necessary to specify the timeframe to notify affected customers upon network/service restoration as operators would in practice notify them as soon as possible. He said that in the event of network/service outages caused by multiple failures/incidents, operators might find it difficult to fulfil the requirement

of notifying affected customers about restoration of affected network/service within the specified timeframe. Mr Wilson CW Lee responded that the relevant requirements set out in the Proposed Guidelines were essentially transplanted from the Existing Guidelines, which had been in place for a number of years, and it was noted that the requirements had generally been observed by the operators over the years. As regards network/service outages caused by multiple failures/incidents, operators might notify the affected customers after restoration of all affected networks/services. The Chairman supplemented that from the experience of network/service outages occurring in the past, the timeframe specified in paragraph 7.2 of the Proposed Guidelines would set a reasonable yardstick for operators concerned to meet the expectation of customers about receiving notification of network/service restoration. Operators should not find it difficult to comply with the relevant requirements set out in the Proposed Guidelines including the timeframe of notifying affected customers which had been in place for many years.

14. The Chairman concluded that OFCA would circulate the draft Proposed Guidelines to the relevant licensees after the meeting for comment, if any, within four weeks, by 16 January 2023. Taking into account the views and comments received, OFCA would finalise the Proposed Guidelines for CA's approval.

*[Post-meeting note: OFCA circulated on 19 December 2022 the Proposed Guidelines to relevant licensees for comment by 16 January 2023.]*

## **Item 5     Any Other Business**

15. The Chairman advised that the next TRAAC meeting would tentatively be scheduled in the second quarter of 2023. Members will be informed of the meeting arrangement nearer the time.



16. There being no other business, the meeting was adjourned at 3:30 p.m.

**Office of the Communications Authority  
January 2023**