

Letterhead of HONG KONG NETWORK TV LIMITED

October 24, 2000

BY FAX AND MAIL

Ms. Polly Yeung
Legislative Council
Legislative Council Building
8 Jackson Road
Central
Hong Kong

Dear Ms. Yeung

LegCo Panel on Information Technology and Broadcasting

With reference to your letter dated October 16,2000 on captioned subject, we are pleased to submit herewith our views on the following papers.

- (1) Draft Generic Codes of Practice for TV and Draft Radio Codes of Practice;
and
- (2) Draft Competition Investigation Procedures and Draft Guidelines to the
Application of the Competition Provisions of the Broadcasting Ordinance

Should you have any questions, please feel free to contact Ms. Catherine Yeung at (852) 2891-3733.

Yours faithfully

John Sham
Chief Operating Officer

COMMENTS ON CODES OF PRACTICE FOR TELEVISION

Program Standards

1. There are cases that some of the controversial topics are being discussed or presented in the TV programs in the international turnaround channels which are produced for reception globally and are live broadcasted to Hong Kong. The licensee may force to deviate from the code of practice where compliance is not feasible without interrupting the licensee's TV program service. In these events, we would suggest the licensee should have his responsibility discharged.

現時某些國際性頻道的節目製作以全球性廣播為主要市場並透過人造衛星直接轉播，期間可能會探討某些具爭議性的題材。除非中斷節目轉播，否則持牌人將無可避免地未能遵守此業務守則的規定。在此情況下，我們建議持牌人將無須執行此守則的要求。

2. Both e-Commerce and T-Commerce (TV-Commerce) are the trend of this Information-Age. The proposed code of practice did not give clear guidelines on the home shopping service. We would like to know the Government's point of view on this shopping channel concept.

電子商貿(e-Commerce)及電視商貿(TV-Commerce)已成資訊年代的新趨勢建議中的業務守則沒對家居購物服務定下清晰的指引。我們希望瞭解政府對購物頻道概念的想法。

COMMENTS ON ANTI-COMPETITION

We would opine that the most crucial part of BA's role is to establish and maintain an effective system to closely monitor the licensees not to abuse the dominance guidelines by directly and/or indirectly influencing the vendors, content providers and artists, etc.

為保障持牌人能在良性競爭環境下運作，廣播事務管理局任重道遠。設立一個有效率的監管制度尤其重要，避免持牌人濫用支配優勢，直接或間接地影響供應商及演藝從業員等作出某項決定，以達到打擊競爭對手的目的。