

**TVB's Views on Public Consultation Paper on "The New Radio Television Hong Kong:
Fulfilling its Mission as a Public Service Broadcaster"**

Television Broadcasts Limited (TVB) welcomes and supports the approach of the comprehensive Public Consultation Paper which encompasses public purposes, corporate governance under the Board of Advisors, RTHK's editorial independence under the Charter, performance evaluation, extended mode of service delivery and new programming opportunities which lay the foundation and give impetus to the development and purpose of RTHK as a public service broadcaster.

We agree with the consultation paper's clearly defined four missions or public purposes which have been regarded as the mandate objectives of public service broadcasting (PSB) (Clause 2.5 of the Public Consultation Paper):

- (a) "Sustaining citizenship and civil society";
- (b) "Fostering social harmony and promoting pluralism";
- (c) "Establishing education value and promoting lifelong learning; and"
- (d) "Stimulating creativity and excellence to enrich the multi-cultural life of Hong Kong people."

"The broadcasting sector worldwide has generally accepted that PSB plays a role which complements and cannot be replaced by commercial broadcasting." (Clause 2.2 of the Public Consultation Paper) Having regard to the circumstances in Hong Kong, we are proposing an additional fifth public purpose –

"(e) Complementing and not duplicating commercial service broadcasting."

As the consultation paper has repeatedly emphasized that the better-equipped RTHK could provide new programming opportunities to complement the commercial broadcasters, it is our view that it is critical to include it in the public proposes to be fulfilled.

As a commercial broadcaster, TVB would like to put forth further views/concerns in PSB as follows:

1. When RTHK becomes a public broadcaster with its own dedicated channels, its coverage and impact to the public will be no different from other terrestrial TV channels. Therefore, the Charter must guarantee that all content broadcast by RTHK should be regulated in the same way/manner as commercial broadcasters.
2. RTHK, as a public broadcaster, should divest from mainstream programming, such as: *Top Ten Chinese Gold Song Awards Presentation* (十大中文金曲頒獎典禮), which has been more than sufficiently provided by commercial broadcasters. It should concentrate

its resources in serving the special needs and interests of different groups in the community which is not viable for the commercial broadcasting services.

3. With the additional spectrum and resources for digital broadcasting, the mandatory positive programming service as provided by the commercial broadcasters should rest with the future public broadcaster, RTHK.
4. Being publicly funded, RTHK should not engage in the canvassing of TV sponsorship/ advertising/ promotion.
5. As RTHK has its own distinctive role to play in achieving its public purposes, it should complement the commercial broadcasters to provide what is lacking in commercial broadcasting and cater for specific needs and interests of different groups in the community. With public funding, RTHK should concentrate its resources on producing programmes for minority groups. As they may appeal to a niche underserved audience, ratings cannot fully reflect the quality and value of the PSB programmes. Hence, it is our view that the performance of RTHK's programmes should not be judged by ratings alone and audience reach/ market share should not be the key performance indicator.
6. The number of complaints received/ handled/ resolved by RTHK is another important performance indicator. To maintain a credible, accessible and efficient complaints handling system, a complaints committee should be set up for handling day-to-day complaints in a positive, timely and fair manner.
7. Apart from self-evaluation by RTHK, objective assessment conducted by independent organization(s) on RTHK's performance is necessary.
8. RTHK, as a public broadcaster, must observe cost-effectiveness, optimal utilization of public resources and sound resource management, and exercise cost control.