

**Submission by**  
**Metro Broadcast Corporation Limited**  
**to the**  
**Panel on Information Technology and Broadcasting**  
**re Public Service Broadcasting**  
**& The New Radio Television Hong Kong**

Metro Broadcast Corporation Limited ('Metro Broadcast') welcomes the opportunity to put forward its views concerning the new RTHK as a public service broadcaster in the context of the Government's consultation on the subject matter.

Metro Broadcast would like to comment on a few of the recommendations in the proposal.

**Performance evaluation of the new RTHK**

Chapter 5 of the consultation paper concerns performance evaluation of the new RTHK against a set of proposed objectives with identified key performance indicators. Since the proposed evaluation will inevitably touch on, and generate statistics regarding, the entire sound broadcasting market including the other two commercial broadcasters, Metro Broadcast would request for more information on the proposed research methodology and other relevant details in due course. Any market-wide research and survey involving performance of the commercial broadcasters should be conducted in an unbiased manner that is likely to call for prior discussion with all the commercial sound broadcasters.

Metro Broadcast is also of the view that certain parameters may be irrelevant to the assessment of the new RTHK as a public service broadcaster. The use of market share as a KPI is one example. The audience base of the subjects to be served by public service broadcasting in many cases is in fact unlikely to contribute to a statistically significant percentage within the overall radio market.

### **Band III multiplex**

The assignment of a Band III multiplex to the new RTHK for the purpose of providing new DAB service will be a breakthrough in Hong Kong's sound broadcasting industry. Metro Broadcast has in our previous responses to a number of Government consultations including the mobile TV consultations expressed our interest in DAB development if the Government plans to introduce such service in Hong Kong. We have also proposed for consideration by the Government that the existing spectrum assignees should have priority for the use of new spectrum to continue service delivery with the new DAB technologies. Reference is made to the case of digital terrestrial television ('DTT') whereby both existing broadcasters (i.e. Asia Television Limited ('ATV') and Television Broadcasts Limited ('TVB')) were assigned the necessary spectrum without any auction or other allocation arrangements to provide DTT. We are of the view that incumbents in the sound broadcasting industry should be treated on the same footing as ATV and TVB. On this basis, the existing sound broadcasters which are interested in deploying DAB should be granted the relevant spectrum for introduction of DAB. We trust that the Government will safeguard fair competition and establish a level playing field for all industry stakeholders on the matter.

Furthermore, we urge the Government to provide assistance in construction of the necessary infrastructure in order to facilitate the launch of DAB in Hong Kong, just as it had done to nurture FM analogue broadcasting in the past.

Metro Broadcast does not have any particular concern over the other points of suggestion set out in the proposal.

We appreciate consideration of our views by the Government and parties concerned in evaluating how to shape the operations of a new RTHK in the future.

METRO BROADCAST

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