

香港商業廣播有限公司的信頭
Letterhead of Hong Kong Commercial Broadcasting Co., Ltd

Paper No. CB(2)1504/99-00(06)

Mrs. Constance Li,
Clerk to Bills Committee,
Legislative Council,
Legco Building,
8, Jackson Road,
Central.

22nd March, 2000

Re: Bills Committee on Broadcasting Bill

Dear Mrs. Li,

Thank you for your letter of the 15 March. After considering the proposals put forth in the Legislative Council Brief on the Broadcasting Bill, our primary concern is that, despite being entitled a “Broadcasting Bill” it only makes specific reference to television services.

Nowhere in the document are sound broadcasting licences mentioned. Due to the history of basing decisions on sound broadcasting policy on the provisions of the Television Ordinance, we are concerned whether all proposed regulations pertaining to all forms of television licence holders would also automatically pertain to sound broadcasting licence holders. This would seem difficult to achieve, as many of the clauses are completely irrelevant to sound broadcasting licence holders, (scope of television programme service, television programme service locking device etc.) while others are of vital importance (ownership regulations, changes to the royalty payment requirements, competition provisions etc.). There is yet a third group which could be worryingly ambiguous in that they could technically apply to sound broadcasting, but perhaps should not (determination of services primarily targeting Hong Kong, enforcement of licences and sanctions and sanction level increases etc.).

General clarification on the effect of the Bill on sound broadcasting licence holders would be appreciated.

Yours Sincerely,

Winnie Yu,
Director & Chief Executive Officer