

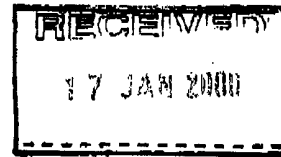
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POWER-OF-ONE

 新世界電話
NEW WORLD TELEPHONE

17 January 2000

Secretary for Works
Works Bureau,
Murray Building,
Garden Road,
Hong Kong.



Attn: Mr. S M Chau

Dear Mr. Chau,

Consultation Paper on a Proposed Charging and Penalty System for Road Opening Works

Reference is made to your letter of 1 December 1999 regarding the captioned matter.

New World Telephone is disappointed to note that most of the comments submitted for previous papers have not been considered in this paper. As one of the new FTNS operators, we have committed to expand and maintain our infrastructure to provide advanced telecommunications services and to cope with the rapid growth of telecommunications market. The implementation of the new proposal will impose a significant financial burden to our business whilst we do not see the scheme will help to reduce the necessity of road opening work. We anticipate a lot of additional administrative works and cost for the Government and the utility companies due to the proposed scheme which will not provide the solutions cost-effectively as mentioned in the paper.

Over the past years, all utilities undertakers (UUs) have been closely co-ordinating and monitoring road opening works to reduce inconvenience caused to the public through the 3-tiers committees, the Road Opening Co-ordination Committee (ROCC), the Utilities Technical Liaison Committee (UTLC) and the Joint Utilities Policy Group (JUPG). As a fixed network operator, we also need to comply with the Road Opening Guidelines for Telecommunications/Broadcasting Operators imposed by OFTA before we submit the road opening application. This mechanism has been running smoothly and effectively during the past.

We opine that "user-pays" principle is not appropriate to apply for this case as all additional cost incurred by the Government and utility companies will eventually be transferred to the users in Hong Kong. We are also of the view that the cost incurred by the Government in providing services to fixed network operators should have been recovered from the FTNS licence fees.

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In light of the economic downturn, it is not a suitable time to implement the new proposal and will ultimately increase the financial burden to the UUs and the users in Hong Kong. Further enhancement to the co-ordination procedure through the 3-tier committees and Utilities Management System (UMS) is the most cost-effective way to improve road opening works.

Yours faithfully,



Lee Kwan
General Manager
Network Development & Engineering
(Tel: 2133 6988 , Fax: 2133 2175)

cc. Pedro Ching
Thomas Yau
C L Wong

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