



18th Dec, 2006

Mr. Louis Leung
Office of the Government Chief Information Officer
Commercial, Industry and Technology Bureau
2/F, Murray Building
Garden Road
Hong Kong

Dear Mr. Leung

Re: Public Consultation on Digital 21 Strategy

Motorola congratulates the Government of the Hong Kong Special Administrative Region (the Government) for the timely decision to update the Digital 21 Strategy. We thank the Government for the opportunity to comment on the draft 2007 Digital 21 Strategy and we are pleased to offer the following comments.

We note that the primary objective of the 2007 Digital 21 Strategy is to build on Hong Kong's position as a world digital city and we recognize the synergy between the 2007 Digital 21 Strategy and Motorola's vision of Seamless Mobility.

Our winning entry in the "Digital Life at the Office" category of the Digital Life Theatre Competition at ITU Telecom World 2006 highlights our vision for seamless mobility in the workplace.

In the video, Edgar, a busy executive, navigates through a typical day interacting with co-workers and his clients while at home, on the road and in the office - using the device he wants to access whatever information he needs – anytime, anywhere. The video demonstrates the impact of the shift towards IP-based networks and how they improve productivity.

- **Spectrum**

Ubiquitous high speed broadband connectivity is essential to the realization of seamless mobility and providing the resources and regulatory environment to enable the mobile broadband access is one of the challenges of the 2007 Digital Strategy.

An essential resource is radio frequency spectrum for broadband wireless access (BWA). The frequency bands in which the deployment of BWA networks is likely to take place in the Asia Pacific region will be the 2.3¹ GHz, 2.5² GHz and 3.5³ GHz bands for licensed spectrum and the 2.4⁴ GHz and 5⁵ GHz bands for licence-exempt spectrum. These frequency bands are also good candidates for BWA spectrum harmonization, which will enhance the value of these frequency bands in Hong Kong as well as the Asia Pacific region.

¹ 2300 – 2400 MHz

² 2500 – 2690 MHz

³ 3400 – 3600 MHz

⁴ 2400 – 2483.5 MHz (ISM band)

⁵ 5150 – 5350 MHz, 5470-5725 MHz, 5725-5875 MHz



Another challenge is the extent to which Hong Kong can recover radio spectrum when making the transition from analogue television to digital terrestrial television (DTT). This 'digital dividend' is a rare opportunity for countries to re-allocate spectrum in the UHF⁶ band for non-broadcast applications.

The 2007 Digital Strategy should also take into account the spectrum⁷ needs of agencies that deliver essential public protection and disaster relief (PPDR) services to the community as advanced wideband and broadband PPDR applications such as mobile video surveillance, video sharing and vehicle registration license plate recognition become widely available. The trend of using a unified communications platform to serve multiple government agencies is increasing. Such communication platforms are viable where there is a close match among agencies in their operational requirements and offer opportunities for increased productivity and operational efficiencies.

– **Building an inclusive, knowledge society**

We agree with the goal to bridge the digital divide in Hong Kong society by providing broadband connectivity for every citizen. Other cities in Asia have begun or are considering initiatives to provide wireless broadband coverage to become 'wireless cities'. Recently, Singapore launched its Wireless@SG, a programme to provide free wireless broadband connectivity for three years in public areas, the central business district, downtown shopping areas⁸ and town centres throughout the island. Metropolitan mesh Wi-Fi networks operating in licence-exempt spectrum have been deployed to provide outdoor and in-building Internet connectivity to residents and visitors to Singapore.

We believe a similar initiative will contribute significantly to the Government's goal of digital inclusion and enhance Hong Kong's position as a wireless city.

– **Regulatory framework**

Radio spectrum is a finite resource and we strongly support the view that a transparent radio spectrum policy that is responsive to market and community needs will ensure that this valuable resource is utilized efficiently for the benefit of the community.

The proposed Communications Authority should continue OFTA⁹'s best practices of transparency, technology neutrality, protection of consumer interests, light handed regulatory approach and promotion of competition.

Yours faithfully,

Khoo Teng Lock
Motorola Government Relations Office

⁶ 700 MHz band

⁷ In Asia frequency bands identified for public safety and disaster relieve by ITU Resolution 646 in WRC-2003 are: 406.1-430 MHz, 440-470 MHz, 806-824/851-869 MHz, 4 940-4 990 MHz and 5 850-5 925 MHz. (some countries in Region 3 have also identified the bands 380-400 MHz and 746-806 MHz for public protection and disaster relief applications). The band 4940 – 4990 MHz is also recommended by the APT Wireless Forum for PPDR broadband applications.

⁸ Orchard Road shopping area

⁹ Office of the Telecommunications Authority