To the Office of the Government Chief Information Officer,

Digital Freedom Foundation involved initially in promoting Free and Open Source software international evolved into an organization which promotes digital sharing based on the ideology highlighted by the Free Software Foundation, and tries to address the digital divide or computer literacy issues that people face in general. We moved our organization to Hong Kong early 2013 to be closer to the place where we operate.

It is with great pleasure that we are submitting our feedback on the 2014 Digital 21 Strategy Public Consultation document named "Smarter Hong Kong Smarter Living".

General:

Overall we have found the document pretty exciting and definitely aiming at great plans for Hong Kong. We believe a lot of those highlighted initiatives are either necessary or of great value to the society in general and for the future of the people living in Hong Kong.

However some of the points surely need further guidelines and it is unclear from reading the document what will effectively be implemented and how. We believe some additional guidance need to be provided so everyone involved in the execution do the right thing and the goals can be achieved.

Specifics:

We have covered issues per topic following the document hierarchy. Still we reference each section to make it easier to track.

(B) Broadband and Wi-Fi Access for Schools to Drive e-Learning

(18, 20) Being member of an organization which travels a lot and where our members are not necessarily living in Hong Kong, progress needs to be made on informing the public and the tourists. Not only do we seldom get FREE WiFi connection once we leave home or hotel but promotion of those free WiFi networks seems to have been omitted. While branding them under the same moniker is surely a good initiative, letting people know that the network is available and where would be a much needed improvement to the plan.

(C) Broadband and Wi-Fi Access for Schools to Drive e-Learning

(22) Is Wi-Fi even safe?

From http://en.wikipedia.org/wiki/Wireless_electronic_devices_and_health

"*International guidelines on exposure levels to microwave frequency EMFs such as ICNIRP limit the power levels of wireless devices and it is uncommon for wireless devices to exceed the guidelines. These guidelines only take into account thermal effects, as nonthermal effects have not been conclusively demonstrated. The official stance of the British Health Protection Agency is that "There is no consistent evidence to date that WiFi and WLANs adversely affect the health of the general population", but also that "...it is a sensible precautionary approach...to keep the situation under ongoing review...".*

In 2011, International Agency for Research on Cancer (IARC), an agency of the World Health Organization, classified wireless radiation as Group 2B - possibly carcinogenic. That means that there "could be some risk" of carcinogenicity, so additional research into the long-term, heavy use of wireless devices needs to be conducted."

And yes mobile phones is of similar concerns and definitely not going away, however is it worth adding more risks to our children?

But besides the health risks, why would you do e-Learning in a classroom/school through the "uncontrolled" internet? Risk of each student lack of focus, or focusing on non-e-Learning sites becomes a very major risk to deployment of Internet at school, which this section doesn't seem to cover, address or even worry about. Surely clarifying the scope, raising issues together with deployment, bringing solutions (firewalling per school/class) is necessary for an effective use.

(D) Programming in Every Child's Education

(23,24) Very good effort in which the Digital Freedom Foundation has been involved since 2007. We believe that problem solving is useful in every part of our lives not just ICT, or future ICT employees. So using ICT and more specifically programming at a young age prepares children for life regardless of their future career focus. Also make sure that the programming language is vendor independent to avoid lock-in. School is a place to learn, not to promote companies. There are currently a lot of FOSS solutions to do just this at different age and recommending Free and Open Source will save a lot of money to the government. Surely a curriculum need to be created and adapted to Hong Kong specific needs and language, but recommending to support Open Educational Resources (OER) and publish the outcome under an OER initiative will encourage the educational bodies to participate further and consider themselves as part of the initiative.

Chapter 4 : Igniting Business Innovation

(27, ...) Yes government Open Data is one sector, but Free and Open Source Software has been and still is a major boost for the biggest companies in the world (and the smallest ones too). Just look at how Google, Facebook, Apple, Twitter, Taobao, NetEase and the likes use FOSS, adapt it to their needs and make profit. This is definitely way bigger than Open Data, is here, available and usable today, and should be promoted as such.

(I) Supporting the Startup Ecosystem

(45,47) What about reducing the price of .hk domain names? Today the average price to rent a domain in HK for one year is about 3 to 4+ times the price of a .com. Doing so would boost .hk adoption and show that Hong Kong is a great place for startups (and other businesses too).
What about promoting and encouraging FOSS through various efforts. In the very short term you will have specific HK based projects which will address HK specific issues and cater various businesses around it. Besides, students get to learn real involvement into products (as compared to "student projects") that get used by real businesses worldwide and the implications of changes. Just as an example, to maintain a Japanese version of LibreOffice (a FOSS Office suite version) needs about 50 people. Hong Kong's version currently "lives on" the Taiwanese efforts.

(O) Multi-platform Government Services

(70) It is highlighted in the document itself that mobile penetration is more than twice than the PC market one, and therefore "multi-platform by default" should be a priority, not just "considered". Partners, enterprises and all industries should be made aware of this fact.

(Q) Paperless Solutions and Collaborative Platforms

(75) Not only paperless can cut cost, but a standardize IT platform centered around Free and Open Source Software will have a huge impact on both cost, security and cohesion between all the government offices. Furthermore it will prevent the government to rely on single vendors and greatly reduce its Total Cost of Ownership. It is surely not an overnight plan, but efforts need to be made and highlighted in this direction to succeed.

In fact Free and Open Source Software is not a single time mentioned in the whole document while governments worldwide have taken positive approaches to reduce their cost and free themselves from vendor locks-in (it seems Hong Kong has started to orient itself in this direction as well). FOSS is a great win for societies at all levels in term of cost, sharing, knowledge, be it in education, government deployments or enterprises. Furthermore you

could very well encourage the creation of FOSS projects to answer the needs to grouped businesses in areas where they do not compete such as accounting, point of sales or whatever their industry generally require (rather than having them import proprietary software). That would develop the local IT market, allow companies to create an ecosystem and probably export their technology.

Last but not least the Open Data plan seems very positive and optimistic. Again with a lack of details it is hard to come up with specific recommendations or pitfalls to avoid. From looking at the current efforts there seems to be quite some work to be done on improving the current status and usability of the published data. Things like using standards and clear licenses rather than your own, providing usable data and open formats, and getting a lively community around your efforts able to voice comments on your website seem paramount for the success of this adventure. In fact there are software already available and free to use (free and open source as a matter of fact) to publish those data (CKAN) which are already used by many governments (USA, Australia, UK, Germany, etc.), there are government bodies getting together, setting up standards and discussing the various challenges they are facing as well as public rating agencies of various government efforts, all of which Hong Kong is either missing or does not seem to be doing very well.

We believe that not only the Hong Kong government needs to go further with the Open Data plan as outlined in the consultation document but should definitely try to fix the current weaknesses in their actual implementation. Our former president now works for the Australian government and has been deploying government Open Data for the past 2/3 years. We would be more than happy to share some of the more detailed recommendations and eventually provide help on this front if it makes sense. In the meantime plans to improve the current infrastructure, listening to the Hong Kong Open Data community that the Hong Kong government is creating and raising the Hong Kong government office into a participating body of those initiatives seems to be missing from "Smarter Hong Kong, Smarter Living".

Conclusion

We feel the overall plan is very ambitious and probably not easy to implement in all parts. Government departments tend to have their own habits and don't always like to be told how to work. However highlighting the strong points, the savings and the benefits will win a lot of efficient department managers and reduce frictions between each channel. We wish you the best for the future and remain at your disposal should you need further details on our thoughts.

Kind regards,
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