

Communications and Technology Branch,
Commerce, Industry and Technology Bureau,
2/F, Murray Building,
Garden Road,
Hong Kong

3rd March, 2004

Dear Sir/Madam,

I am writing this letter to give our views on the government's second consultation paper on digital terrestrial broadcasting in Hong Kong.

The Hong Kong Journalists Association (HKJA) notes the government's intention to press ahead with digital television broadcasting as soon as possible, taking what it calls a "market-led approach". This, we assume, means that the private sector will lead the way in adopting digital broadcasting.

While we support the introduction of digital terrestrial broadcasting, we are concerned that the adoption of a pure market-led approach might be to the detriment of one vital section of the broadcasting industry – public service broadcasting. This approach, in turn, could harm diversification and public access to broadcasting services, which are vital elements of freedom of expression.

The HKJA recently submitted a paper to the Commerce, Industry and Technology Bureau on ways to enhance public service broadcasting, following a regional conference held in Colombo, Sri Lanka in December 2003. We enclose this paper for your reference.

The general thrust of the paper is that governments have a responsibility to ensure a viable environment for the development of independent and viable public broadcasters that inform, educate, empower and entertain.

Indeed, we believe that the government is under a legal obligation, according to article 19 of the International Covenant on Civil and Political Rights, to create an

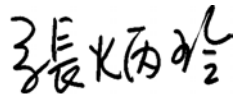
environment where a diverse, independent media can flourish. And part of this obligation is to promote pluralism within and to ensure equal access of all to the media.

We note that the development of digital broadcasting will give an opportunity for further media diversification. We support such a move, but feel that the government should at the same time give serious consideration to the opportunities that the introduction of the new technology will give for the promotion of public service broadcasting. This should take the form of allowing the existing public service broadcaster (Radio Television Hong Kong) to develop its services and encouraging other organizations, including potential community broadcasters offering public access services, to develop new programming.

In this respect, we would draw the government's attention to the example of the Netherlands, as set out in the annex to the consultation document. We note in this respect that the Netherlands plans to provide a multiplex for a national and regional public television service. The Hong Kong government should adopt a similar approach towards digital broadcasting.

The HKJA also notes what appears to be a somewhat lacklustre approach towards the development of digital audio broadcasting. We would urge the government to create the necessary environment that would allow the public broadcasting sector to press ahead with radio digitalization, so it may provide higher quality and more diverse services.

Yours sincerely,

Handwritten signature in black ink, appearing to be '張平靈' (Cheung Ping-ling).

Cheung Ping-ling
CHAIRPERSON