

Radio Television Hong Kong
Response to the Second Consultation on
Digital Terrestrial Broadcasting in Hong Kong

RTHK welcomes the opportunity to comment on the Second Consultation on Digital Terrestrial Broadcasting in Hong Kong.

As digitization is a global trend, RTHK supports the Government's initiative to introduce Digital Terrestrial Broadcasting into Hong Kong as soon as practicable. Meanwhile, we have the following views to present:

(1) Technical Aspects

(A) Digital Television

(i) Technical Standard

The second consultation paper recommended adoption of DVB-T in digital terrestrial broadcasting in Hong Kong. Given that this standard is widely applicable, flexible and is an interoperable standard, with continuing technological development in the family e.g. MPEG4 AVC/ H.264, MHP/ GEM, DVB-S2, DVB-H, PCF, hierarchical modulation (LP & HP) and mobile reception, DVB-T is a good technical standard for early introduction of Digital Terrestrial Television (DTT) broadcasting in HK.

(ii) Frequency Planning and Coordination

The second consultation paper proposed an assignment of the Multiple Frequency Network (MFN) to TVB and ATV for simulcasting. A multiplex in an 8 MHz channel bandwidth could support 24 Mbps or more; in the light of further compression encoding improvements, a significant increase in channel payload is foreseeable in the near future, as less bitrate is required per channel. Each Standard Definition Television (SDTV) service in the multiplex takes nominally 4-6 Mbps, hence the MFN multiplex could

support 5 SDTV channels. Statistical multiplexing can also be deployed to increase the effective payload.

We propose the fifth channel be assigned for public broadcasting service.

(iii) Analog Switch-off

A government review within 5 years of the commencement of simulcast or when the penetration of DTT broadcast reaches 50% of all TV households as mentioned in para. 33 of the 2nd Consultation Paper is supported. Analog switch-off, which will affect the mass viewing population, must be handled with care and should be implemented only when the public finds DTT reach acceptable. Special attention should be paid to protect the interests of the under-privileged and minority groups.

(iv) Consumer Interests

Once DVB-T is being introduced as the DTT standard in Hong Kong, consumer interests should be closely monitored in case of a migration from this standard to another one, including the introduction of a new DTT standard in China. Such a migration should not in principle cause convergence inconvenience to consumers who have adopted the DVB-T receiving equipment.

(B) Digital Radio

On digital radio broadcasting in Hong Kong, the second consultation paper proposed a market-led development. RTHK believes that the development should not be solely market driven; priority should be given to upgrading analog AM services in the territory, through a deployment of digital radio broadcasting services as soon as possible.

In Hong Kong there are altogether 7 FM and 6 AM services provided for the community; RTHK runs 3 FM and 4 AM channels. Over the years, complaints

of poor AM reception have been frequent. Low power FM transposers have been deployed to compensate the inadequacy of AM services in poor reception areas. Now that almost all FM channels have been exhausted, the prospect of further improvement of AM services looks dim.

Digital radio broadcasting technology is maturing and offers numerous advantages e.g. improved sound quality, interference-free reception, single frequency network (mobile) reception, value-added data plus an efficient use of frequency spectrum. Both Digital Audio Broadcasting (DAB) and Digital Radio Mondiale (DRM) systems look promising for further development.

DAB accommodates up to 6 stereo radio services using a 1.5 MHz channel bandwidth, a natural option for improving the existing AM radio services and for expanding new radio services in Hong Kong, especially for serving the minority sectors in the community. On the other hand, DRM employs the existing AM spectrum for digital transmission of sound and data. RTHK will continue to monitor the trend of digital radio broadcasting developments and assess their relevance to future applications and improvements.

(C) Co-operation among Broadcasters

The introduction of Digital Terrestrial Broadcasting (DTB) in Hong Kong should take into consideration the building of a converged platform among broadcasters to attain economy of scale through sharing of infrastructure and services. Hill-top transmitting sites and their management, set-top boxes and their rolling-out, joint comprehensive EPG for viewers are some of the areas where cooperation is recommended. RTHK will initiate industry forums and offer to coordinate industry collaborations where necessary.

(2) Importance of Public Broadcasting Service

RTHK's main concern about the implementation of digital broadcasting in the HKSAR is how we should make use of the opportunity to further enhance the

value of Public Broadcasting Service. As reflected by the developments overseas, public broadcasting has always been a major focus for deliberations in the development of digital broadcasting. While technology alone cannot enhance information flow, the attraction of digital broadcasting is expected to be content-driven, coupled with diversified programming provided for the public and regulations to protect the interests of consumers. The fact that people from various social sectors are increasingly concerned about access to speak their minds demonstrates the need for the establishment of a public channel. Sound arguments put forth in international conferences and authoritative papers stressing the impact of public broadcasting service are attached in *Annex (I)*.

Here in Hong Kong, the significant role of a public broadcaster has been clearly spelt out in the Broadcasting Review Board Report 1986, *Annex (II)*. Over the years, RTHK's role as a public broadcaster has been well recognized and reaffirmed. On 18 February 2004, the policy on broadcasting was deliberated in Legislative Council during which the role of RTHK, as a public broadcaster, was highly regarded by legislators and the government.

As the sole public broadcaster in HKSAR, RTHK, with 75 years of history, is striving to provide balanced, objective and high quality programmes to inform, educate and entertain the people of Hong Kong. In 1994, it successfully launched the first local electronic media website which has now become widely accessible to the public, both here and overseas.

(3) Other Observations and Suggestions

(A) Digital Television

RTHK as a leading local media organization recognizes the importance of its role in digital development and application. However, irrespective of whatever changes that are to be introduced by new technology, RTHK holds the view that the present allocation of prime time slots in TVB and ATV should be maintained. This arrangement, we believe, is in the best interest of the community.

Upon the implementation of Digital Terrestrial Broadcasting, it is expected that:

- (i) There will be a proliferation of new media players and broadcasting channels.
- (ii) There will be an increasing demand from various sectors for programmes on arts, culture and education as well as programmes for the youth, elderly, minority groups and the under-privileged. The existing 10 half-hour prime time slots allocated for RTHK in TVB and ATV will be insufficient to cater for future needs. In various consultation exercises, members representing various social sectors have reiterated their strong support for RTHK to be allocated more resources and TV air time.

In view of the above, RTHK proposes three options to be considered in enhancing public broadcasting service upon the implementation of Digital Terrestrial Broadcasting:

- (a) RTHK be allocated a channel to run on its own with sufficient funding arrangements.
- (b) A Public Broadcasting Service Channel be set up and run by a consortium where RTHK can act as co-coordinator and operator with programme content provided by government departments, public bodies and commercial partners, apart from RTHK's own productions.
- (c) An Education Channel be set up for the public. (This could be considered in conjunction with Option (b).)

(B) Digital Radio

On Radio, RTHK recommends the following directions for consideration regarding DAB development:

- (a) Public requests on more specialized services have been constantly on the increase in recent years. Owing to the limited number of frequencies at present, there is no better solution to address the above

demand. With the marked increase in the frequencies offered by DAB, the government could consider allocating additional frequencies for setting up specialized channels such as Education Channel, Arts Channel & Youth Channel etc. to better serve special interest groups.

- (b) Under the current analogue AM/FM broadcast systems, new digital technology, such as DRM, could enhance the quality of reception of AM broadcast throughout the territory.
- (c) DAB, DRM and DMB tests are being conducted and progress has been so far encouraging in various Asian-Pacific countries including the Mainland. Hong Kong, as a leading technology centre in the region, should be prepared to embrace these new technologies. RTHK has planned to conduct DRM and Band III DAB tests in 2004.

RTHK is well aware of the impact of the evolving media scenario. Following the trend of globalization of information technology, both government policies and the regulatory framework need to be reviewed and revised to enhance the quality, range and diversity of the broadcasting services in Hong Kong.

Radio Television Hong Kong

3 March 2004



Annex (I)

Extracts and Quotes from International Conferences and related papers

- (i) Bellagio Symposium on Media, Freedom and Poverty 5 October 2003 Joint Statement

“ Public service broadcasting mandates should include obligations to provide information and education to address issues of poverty; and to ensure that public service broadcasters provide universal service.”

- (ii) World Summit on the Information Society – Broadcasters’ Declaration (9 December 2003)

“In many parts of the world, independent public service broadcasting has a special responsibility in this regard. Distanced from political and economic pressures, it has the role of ensuring access to information, knowledge, culture and entertainment for all citizens, including vulnerable and minority groups, and of being a driving force for the creation of domestic content.”

- (iii) The BBC’s Greg Dyke at the International Emmy Awards (24 November 2003)

“The BBC continued commitment to indigenous programming right across the board is one of the main reasons our biggest commercial competitor, ITV, spends more on original production than any other channel in Europe.....A strong, publicly-funded broadcaster at the heart of our industry has a positive influence far beyond the confines of our own channels and services.”

- (iv) Letter by the Association of Public Television Stations, Corporation for Public Broadcasting and Public Broadcasting Services to the Federal Communications Commission of the US (8 December 2003)

“Congress long has advocated broad access to public television services, regardless of the technology used to deliver those services, in order to advance the compelling governmental interest in increasing the amount of educational, informational and local public interest programming available to the nation’s audiences.”

- (v) International Federation of Journalists: The Challenge of Public Broadcasting In Asia, Conference, Colombo 1-3 December 2003 Final Declaration

“That the creation of tolerant, peaceful and just society depends upon the freedom of citizens to have access to quality media that respect the principles of pluralism, diversity and universal respect for human rights.

That public service media should: Inform, Educate, Empower and Entertain, based on values including:

- *respect for editorial independence including independence from both governments and political forces, from commercial interests and from undue influence from other pressure groups.*
- *Balance and fairness*
- *Transparency*
- *Social responsibility such as education and children*
- *Diversity in the workplace and programming*
- *Public accountability, public participation and access for all and elimination of all forms of corruption in the media*

- *Commitment to quality*
- *Creativity*
- *Freedom of association*

(vi) Culture and Heritage Commission, Policy Recommendation Report
(31 March 2003)

3.27 Apart from the school and the family, the mass media is also influential in cultural education. Hong Kong has a thriving mass media, but only a minority of local newspapers carry a regular cultural section. The four free television channels provide few cultural programmes (less than 4%), which are assigned to unpopular time slots. Out of the 13 local radio channels, only Radio Television Hong Kong maintains a cultural channel. Without interfering with the independence of the media, we recommend that the government encourage the media to provide more coverage on culture and the arts. The government should also explore the feasibility of setting up local television and radio channels dedicated to culture, arts, technology and education programmes.

Annex (II)

Extracts from the Broadcasting Review Board Report 1986 (paragraphs 35-38, BRB Report)

“RTHK’s television programmes are highly regarded and meet a genuine need for public service programmes” and that “the need for such programmes which educate and inform will continue to grow as HK passes through a period of rapid socio-political development in the future”.

“The broadcasting needs of the public could not be satisfied solely by imposing more precise requirements on the commercial licensees, and the public broadcasters should be given a more substantial television presence than that currently enjoyed by RTHK”.