



中国移动通信
CHINA MOBILE



中國移動萬眾電話有限公司
CHINA MOBILE PEOPLES TELEPHONE
COMPANY LIMITED

香港總公司
CIT Information Center: 2 Kwai Cheong Bldg.
Coca Chang, New Territories, Hong Kong
電話: 24 2621 2045 8000
傳真: 24 2621 2045 1731

中國移動萬眾電話有限公司
A member of China Mobile
Communications Corporation

Our Ref: F030-CM-EY-08

4 March, 2008

By fax (2511 1458), post & email

Communications and Technology Branch
Commerce and Economic Development Bureau
2/F Murray Building
Garden Road
Hong Kong

Attn: Assistant Secretary (B)1

**Consultation Paper on the Creation of A Unified Carrier Licence under the
Telecommunications Ordinance**

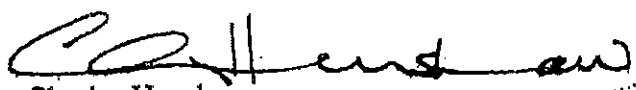
Dear Sir/Madam,

We hereby submit our comments on the subject consultation paper published on 21
December 2007 for your consideration.

An electronic copy of the captioned has been sent to the email address:
ucl@cedb.gov.hk

Should you have any queries, please feel free to contact Mr. Eric Yeung at 2945 8313.

Yours sincerely,
For and on behalf of
China Mobile Peoples Telephone Company Limited


Charles Henshaw
Director and Chief Executive Officer

China Mobile Peoples Telephone Company Limited

4 Mar 2008

China Mobile Peoples Telephone Company Limited

("PEOPLES")

Response to

Consultation Paper on the Creation of A Unified Carrier Licence

("Consultation Paper")

Date of submission: 4 March, 2008

China Mobile Peoples Telephone Company Limited

4 Mar 2008

PEOPLES would like to submit its views on the Consultation Paper issued by Commerce and Economic Development Bureau on 21 December 2007.

All abbreviations have the same meaning as in the Consultation Paper.

Q1. The Secretary invites comments on the proposal of creating the UCL as detailed in paragraphs 9-13

PEOPLES agree with the proposal.

Q2. The Secretary invites views on the proposed migration arrangement under paragraphs 15-16.

PEOPLES agree with the proposal.

Q3. The Secretary invites views on the proposed period of validity for UCL under paragraphs 18-19, and the proposed conversion arrangement in paragraph 25.

PEOPLES agree with the proposal.

Q4. The Secretary invites views on the proposed GCs of UCL as set out in Appendix A.

PEOPLES agree with the proposal.

Q5. The Secretary invites views on the proposed fee schedule of UCL as set out in Appendix B.

PEOPLES agree that there should be a unified customer connection fee for all types of services including fixed, nomadic and mobile services. The basic principle should be that the level of charge should be no more than necessary to cover the cost of licence administration by OFTA.

China Mobile Peoples Telephone Company Limited

4 Mar 2008

PEOPLES basically object to any fee based on number assignment. The need for longer-digit migration arises from the actual market demand, rather than inefficient allocation by the network operators.

PEOPLES prefer an adequate administrative step to ensure efficient use rather than some sort of financial penalty. If the government decides to levy a non-subscriber fee component, OFTA should in return adopt a more streamlined procedure to assign number resources to operators within a shorter application lead-time.