



**The British
Chamber of Commerce
in Hong Kong**

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港 (By email: psb@cedb.gov.hk)

英 4th January, 2010

商 Mrs Rita Lau Ng Wai-lan, JP
Secretary for Commerce and Economic Development
會 Government of the Hong Kong Special Administrative Region
2/F, Murray Building
Garden Road
Central, Hong Kong

Dear Mrs. Lau,

**Public Consultation Paper on The New Radio Television Hong Kong:
Fulfilling its Mission as a Public Service Broadcaster**

I write on behalf of the British Chamber of Commerce in Hong Kong to reflect the views of its membership on the October 2009 published Public Consultation Paper on The New Radio Television Hong Kong: Fulfilling its Mission as a Public Service Broadcaster.

The British Chamber is one of Hong Kong's largest international business organisations, comprising major multinational companies and institutions, as well as a substantial number of SMEs. The Chamber represents a broad spectrum of British, Hong Kong, international and Chinese companies. Collectively, this membership makes a significant contribution to the Hong Kong economy and its members employ approximately 10% of the Hong Kong workforce, and, as such, constitutes a significant and representative cross-section of business opinion in the SAR.

Our over 1,000 member companies feel strongly that Hong Kong is our home and that freedom of speech is essential for a successful international business centre and is also in the interest of our diverse local community, and individual interests.

The Chamber also observes that Hong Kong's enviable international reputation and its many business strengths are founded jointly on this freedom of speech and on Hong Kong citizens' competence in the international language of business, English. In this area the Radio Television Hong Kong's (RTHK) fine English language channel, RTHK Radio Three, contributes materially and on a daily basis to the local community's English language skills.

Where business gets done

In addition, to RTHK's demonstrable support to the indigenous communities' English language skills, RTHK also provides an objective understanding of both local and international issues in English and Chinese. Importantly, however, RTHK Radio Three also performs a converse role to inform the international community in matters of pressing importance to the local community, and on matters of international importance in a highly professional and objective manner.

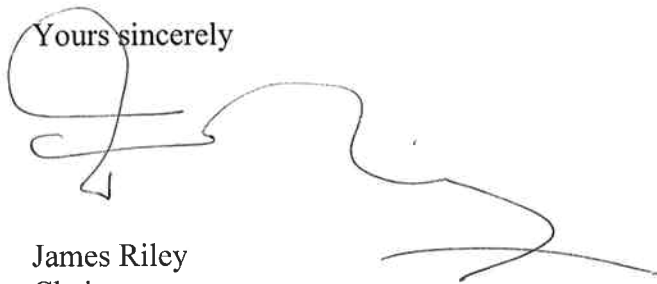
The Chamber also observes that a public service English language broadcaster is crucial for the international and local community to actively contribute to the issues of the day through frank exchange, debate and feedback programmes that characterise RTHK in both English and Chinese languages. In addition, The Chamber would also note that such conduits of public opinion should be seen as useful to the HKSARG, to understand the positions of different interest groups.

Our specific comments on the October 2009 Public Consultation Paper include the following:

- The Chamber considers that the significant expansion of services proposed should not be at the expense of current strengths, for example the English language (RTHK Radio 3) programme, 'uncensored' content, free flow of information, free press and freedom of expression.
- The Chamber is concerned that under Section 2.5 (a) (i) where the Consultation Paper states 'promoting understanding of our community, our nation' should be not comprise a means for propaganda and excessive patriotism.
- The Chamber supports Section 2.5 (a) (iii) in which public service broadcasting is 'providing an open platform for the free exchange of views' as RTHK's future role should not in any way diminish press freedom in Hong Kong that was guaranteed in the Basic Law of the Joint Declaration. RTHK has long been regarded as a barometer of press freedom in Hong Kong, and in this regard Hong Kong citizens and the international business community have always carefully watched its objectivity and stance.
- The Chamber strongly supports Section 2.5 (c), in which public service broadcasting and RTHK has a significant future role in 'promoting lifelong learning.'
- The Chamber strongly supports public service broadcasting and RTHK's role in 'stimulating creativity' [Section 2.5 (d)]. The Chamber encourages consideration of the value of 'stimulating creativity' and not simply in a narrow 'silo' sense to designers, artists, singers, dancers, but as a genuine value to Hong Kong's current pillar industries to allow differentiation with key competitors regionally.

- Under Section 3.2, the Chamber is concerned that RTHK must remain editorially independent. The Consultation Paper recommendation appears to ignore the fact that RTHK has been a *de facto*, and highly respected, public service broadcaster in Hong Kong for many years. The Chamber is worried that the Board of Advisors appointed by the Chief Executive to advise RTHK and the Director of Broadcasting on editorial policies could undermine the public's trust and support for public service broadcasting that has been developed over time by the RTHK institution.
- The Chamber considers that Section 5.6, Objective 8 'Ensure cost-effectiveness and optimal utilization of assets...the reduction of administrative layers' appears to be cutting costs whereas Section 5.6, Objective 5 states 'Maximise the social impact by reaching as large a population as possible...' seem to contradict each other. In fact, greater funding may well be required to service the new objectives sufficiently.
- The Chamber suggests, under Section 5.8, Objective 12, that a 'credible, accessible and efficient complaints handling system' should be handled by the Efficiency Unit's 1823 hotline to maximise cost-effectiveness.

Yours sincerely

A handwritten signature in black ink, appearing to be 'James Riley', written in a cursive style. The signature starts with a large loop and extends to the right with several horizontal strokes.

James Riley
Chairman