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## **Hong Kong Telecommunications Users Group Response to OFTA's second consultation regarding Type II Interconnection**

In response to OFTA's second consultation regarding Type II interconnection, Hong Kong Telecommunications Users Group ("HKTUG") is pleased to provide our comments:

- Overall speaking, HKTUG is in favor of OFTA's approach in the second consultation paper in determination of Type II interconnection. The key thing is we would like to see that the definition of alternative carrier be defined more specifically and should be a fair comparable. In particular, we do not think bundled services such as those offered by cable-TV operator(s) are fair comparables to a pure FTNS operator.
- Regarding Point A Type II interconnection, HKTUG is in favor of OFTA's Option III: to have interconnection be lifted after a "transitioning period" and a "grandfathering period". We think this approach will best serve the interest of both investors (industry) and end users.
- In particular, we favor the building by building approach as it is more specific and precise than the other two methods. We also believe that in order to make the transitioning period effective, three years may be the minimum.
- We are also in favor of OFTA's view in respect of Point B Interconnection at Street Level and Point C Interconnection at Individual Building Level.

We wish to see that broadband interconnections be implemented as soon as possible.

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