



3 April 2014

The Communications Authority
c/o Office of the Communications Authority
20/F, Wu Chung House
213 Queen's Road East
Wan Chai, Hong Kong

Dear Sir/Madam,

Public Consultation on the Renewal of the Domestic Free Television Programme Service Licences of Asia Television Limited and Television Broadcasts Limited

We write to express our views on the Renewal of the Domestic Free Television Programme Service Licences of Asia Television Limited (ATV) and Television Broadcasts Limited (TVB) which is now open for public consultation.

The Executive Committee of the Hong Kong Advertisers Association (HK2A) recently conducted a mini survey among our members and we would like to communicate our key concerns which are listed below:-

1. ATV an incapable channel to access target audience

Given the low rating points, we found ATV an incapable channel for advertisers to reach target audience and delivering results. More effective use of the channel is strongly demanded.

2. Current advertising format or platforms inadequate for advertiser to deliver message.

The advertising formats provided by both ATV and TVB are inadequate and non-interactive. TVB, though strong on tvb.com, has not addressed cross TV-internet packages.

3. Measurements and statistics about the audience not accurate

Current TV audience survey contains too few sample audience to be representative for the advertisers to target the desired audience accurately and effectively.

4. Advertising fee for TVB too high

The current advertisement rate card and tariff system could not help to reach the target audience efficiently and effectively. Despite the drop in viewership, rate card of TVB is startling expensive holding the lion's share of TV market. The highest rates also extended for the whole night. The current pre-emption system is a myth without good supporting or audit bodies to support.

We sincerely hope that you could take these into account for the renewal of the Domestic Free Television Programme Service Licences.

We look forward to your favourable reply.

Yours Sincerely,

Raymond Ho
Chairman