

By post and by email at joyceli@ofca.gov.hk

30 August 2023

Ms LI Le Joyce  
Regulatory Affairs Offr (Regulatory 13)5  
Office of the Communications Authority  
29th floor, Wu Chung House  
213 Queen's Road East  
Wan Chai, Hong Kong

Dear Ms LI

**Views from The Hong Kong Institution of Engineers  
regarding the Draft “Code of Practice  
for the Provision of Mobile Access Facilities in New Buildings  
for the Provision of Public Mobile Radiocommunications Services”**

On behalf of the Institution, I am pleased to present to you our views and suggestions as set out in the enclosure for your consideration on the captioned subject.

The Institution welcomes the opportunity to work with the Government and offer our expertise and experience on the area of concern if and when it is needed.

Thank you.

Yours sincerely



Ir Peter SI  
Director

AS/PS/SS

**Enclosure**

**Views from The Hong Kong Institution of Engineers  
on the Draft “Code of Practice  
for the Provision of Mobile Access Facilities in New Buildings  
for the Provision of Public Mobile Radiocommunications Services”**

The Hong Kong Institution of Engineers (HKIE) is pleased to submit its comments on the “Code of Practice for the Provision of Mobile Access Facilities in New Buildings for the Provision of Public Mobile Radiocommunications Services” (Mobile CoP) drafted by the Communications Authority to assist building developers in making provision for the installation, by mobile network operators (MNOs), of those mobile communications facilities in new buildings that would bolster mobile network coverage in Hong Kong.

2. From the HKIE’s point of view, any development that advances and popularizes the fifth generation (5G) mobile technology should be encouraged in principle because of the multivarious benefits, for example expanding the adoption of innovative applications such as the Internet of Things (IoT) and big data analytics, that this technology provides access to. The extension of mobile network coverage is a quintessential example of such a development. On this account, the codification in the Mobile CoP for the standards and requirements of Mobile Access Facilities (MAFs), which helps aligning the installation practices of mobile communications facilities across the city, is much welcomed by the HKIE.

3. It is stipulated in Section 5.11 of the Mobile CoP that MNOs, under the Lands Department’s future provisions, will no longer be required to apply on a case-by-case basis for a waiver of Radio Base Stations (RBSs) installations in private residential or non-commercial buildings. The HKIE welcomes the waiving of this requirement and proposes extending it to all the new building types subject to the Regulation 28A of B(P)R with a view to incentivising MNOs to provide a more comprehensive mobile network coverage.

4. In the long term, and especially in consideration of Hong Kong’s ongoing evolution into a preeminent innovation and technology hub in Asia, a thorough and robust mobile network infrastructure must be put in place. Such mobile access infrastructure requirements should encompass existing buildings as well as new buildings, for both carry equal weight in facilitating equal access for all average user and any biased mobile network availability is suboptimal for a modern city. It has been noted, however, that the Mobile CoP’s concern is exclusive for new buildings, as such the HKIE strongly suggests the Community Authority to extend the coverage to existing buildings in future revisions of the Mobile COP built on the success of the current version for new buildings, and to consider a more holistic execution plan for all buildings in the formulation of mobile communication development policy for Hong Kong. The execution of the Mobile CoP should also be reviewed regularly in order to ensure its effectiveness.