



January 11, 2008

SFC (Electronic Submission of DI Notices)
8/F Chater Road
8 Connaught Road
Central
Hong Kong

Attn: Supervision of Markets Division

Dear Sirs,

The Chamber of Hong Kong Listed Companies is pleased to comment on the consultation on the proposal to mandate electronic submission of disclosure of interests notices.

The Chamber supports initiatives that contribute to market fairness and efficiency.

Under this principle, we agree with the rationale of the Commission in shifting to mandatory electronic submission of DI notices as outlined in paragraph 15 of the consultation paper. We believe that electronic mode has become the mode of communication, therefore shifting to electronic submission should not limit the ability of any filers in fulfilling his/her filing obligations.

As for the proposed model, we support the adoption of Option B (2) based on the reasons outlined in paragraph 20 of your consultation paper. The additional email address set up required for listed companies is acceptable. The filing process based on a web-based system and web-based forms are user-friendly. The retention of the present electronic form also minimizes the effects to existing users of those forms.

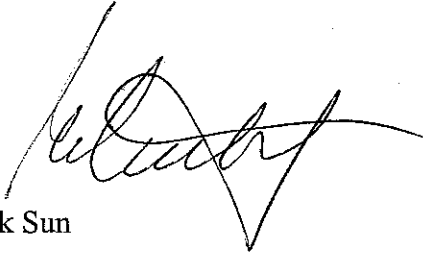
As regards the proposal to retain the existing approach of updating the DI pages on HKEx website once a day at around 5 pm on a business day, we feel this is acceptable as most listed companies are used to this time frame and there are no urgent needs to see the updates on a real time basis.

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With regard to the requirements relating to Registers of Interests and Short Positions kept by listed companies, we support the view as stated in paragraph 37 of the consultation paper that it is not necessary to impose straight requirements on the timing and how they are being kept nor to impose the right of inspection by the public based on reasoning in previous paragraphs.

Yours sincerely,
For and on behalf of
The Chamber of Listed Companies

A handwritten signature in black ink, appearing to read 'Patrick Sun', is written over a light blue horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick Sun
Chairman
Financial and Regulatory Affairs Committee