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10 January 2008

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

Attn: Supervision of Markets Division

**Re: Comments on the Consultation Paper on the Proposal to Mandate Electronic Submission of Disclosure of Interests Notices**

Dear Sirs:

T. Rowe Price International, Inc. ("TRPI") is an investment manager licensed by the Securities and Futures Commission (Central Entity No: ABY663), for the regulated activities of Advising on Securities and Asset Management. As at 30 September 2007, TRPI, together with its registered investment adviser affiliates, (collectively "T. Rowe Price") had over \$396 billion of assets under management. T. Rowe Price has a global client base, and serves as investment manager for institutional clients as well as a number of proprietary and sub-advised collective investment schemes. T. Rowe Price Group, Inc., the parent company of TRPI, is a financial services holding company listed on the Nasdaq Stock Market and included in the S&P 500.

TRPI welcomes the opportunity to comment on the Consultation Paper on the Proposal to Mandate Electronic Submission of Disclosure of Interests Notices.

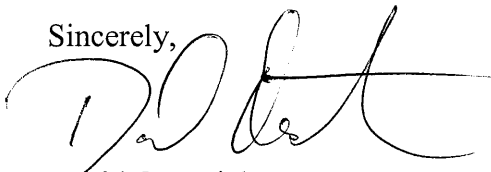
We support the SFC's plan to make electronic submission of disclosure of interest notices mandatory. We currently use the electronic submission method and find it a straightforward and user-friendly mechanism. We agree that electronic submissions promote environmental friendliness, efficiency, and security of the market as a whole. In particular, we agree that Option B (2) is the most appropriate of the five proposed models. Option B (2) simplifies the filing procedure by not requiring the filer to make two separate submissions while still providing notice to the listed corporation by the SEHK.

Furthermore, we support the decision to retain the current disclosure of interest form and electronic submission system. The proposal implies that the HKEx will develop a web-based system and web-based form that will eventually replace the current method. In developing this new procedure it would be helpful if the HKEx could maintain the user-friendly aspects of the current system. Filers need to be able to save partially completed forms, email forms during the preparation process and save completed forms to their in-house electronic repository storage systems. The current form and system allow for these actions, while a web-based system might pose certain limitations.

We would also like to suggest that a “Comments” box be added to the form to allow filers to include explanatory notes. This allows filers to provide adequate information when the circumstances of the disclosure do not exactly match one of the provided categories.

Once again, we thank you for the opportunity to comment on the proposals. Please do not hesitate to contact us if you have any questions regarding our comments, or need any additional information or assistance from us.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Oestreicher', with a long horizontal flourish extending to the right.

David Oestreicher  
Vice President and Associate Legal Counsel