

**C L I F F O R D  
C H A N C E**

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IN REPLY PLEASE QUOTE

DATE

8 January 2008

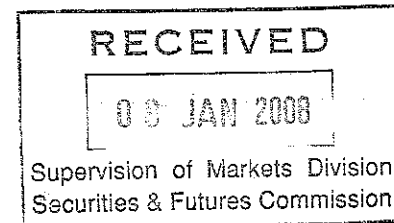
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**BY HAND**

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

Attention: Supervision of Markets Division



Dear Sirs,

**Re: Electronic Submission of Disclosure of Interests Notices**

We are writing in response to the consultation paper proposing changes to the current filing system mandating the electronic filings of Disclosure of Interests Notices.

We agree that of the possible models for mandating electronic filing Option B(2) is the more appropriate, and we would support its adoption.

We support retaining the existing approach in relation to publication of DI Notices on HKEX's website until such time as HKEX changes its practice on publication of price sensitive information during market trading hours.

As regards the relaxation of the prescriptive requirements on registers of interests and short positions kept by listed companies we believe that whether or not the requirement is statutory listed companies have a duty to ensure that their records are properly maintained, accurate and up to date, and any change which would in any way compromise this cornerstone of good corporate governance would send the wrong signal to the market.

Yours faithfully,

*Clifford Chance*

**CLIFFORD CHANCE**

HKEX 16509/01

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