

CHAPTER 4

**THE GOVERNMENT OF THE
HONG KONG SPECIAL ADMINISTRATIVE REGION**

GENERAL REVENUE ACCOUNT

GOVERNMENT DEPARTMENTS

Information Services Department

Television and Entertainment Licensing Authority

Radio Television Hong Kong

**Management of
government publicity programmes**

MANAGEMENT OF GOVERNMENT PUBLICITY PROGRAMMES

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MANAGEMENT OF GOVERNMENT PUBLICITY PROGRAMMES

Summary and key findings

A. **Introduction.** Publicity is an important feature of modern government. The Information Services Department (ISD) serves as the Government's advertising and news agency, publicity campaign adviser, public relations consultant, and publisher. The Government mounts a number of major publicity campaigns each year, employing a wide range of publicity measures and advertising means. The messages of many publicity campaigns are disseminated through the broadcasting of Announcements in the Public Interest (APIs) on television and radio. The notional cost of airtime to the Government for broadcasting APIs on television and radio is estimated at \$418 million for 1999-2000 (paras. 1.1 to 1.4).

B. In 1999-2000, the funds allocated for major promotion efforts across the Government were about \$340 million. Starting from 2000-01, funds for undertaking publicity activities are provided under the departmental vote (paras. 1.5 to 1.8). Audit has recently conducted a review on the management of government publicity programmes. The audit findings are summarised in paragraphs C to J below.

C. **Deficiencies in the system for monitoring the use of free airtime for broadcasting APIs.** Under the conditions of the relevant broadcasting licenses, three local commercial television broadcasting licensees and two local commercial radio broadcasting licensees are required to broadcast on each of their channels such APIs as specified by the Broadcasting Authority (BA). The ISD is responsible for the placement of all APIs to these television and radio stations for broadcasting during the allocated airtime (paras. 2.2 to 2.7).

D. The results of an audit examination conducted in April 2000 showed that the Chinese channel of a television licensee had omitted to broadcast 20% of the scheduled TV APIs during the prime time programming hours (daily from 6 p.m. to 10:59 p.m.). Furthermore, on checking whether two television licensees had broadcast the particular APIs at the specified time in accordance with the ISD schedules, the examination found that for about 10% of the APIs aired, these two licensees had broadcast a wrong API. Following the audit findings, the ISD had implemented a sample checking system since May 2000 (paras. 2.8 to 2.15). However, Audit noted that there were still deficiencies in the monitoring system, as follows:

- the sample size for checking the television/radio channels of three licensees was too small (paras. 2.19 and 2.20); and

- the sample checks did not cover six (out of seventeen) channels of these three licensees (paras. 2.21 and 2.22).

E. Audit noted that the Radio Television Hong Kong (RTHK) broadcast the APIs scheduled by the ISD on any one of its three Cantonese channels, instead of broadcasting them on all three channels. Audit also noted that the ISD schedules of APIs sent to the RTHK did not cover the Putonghua channel, the bilingual channel and the channel relaying the BBC World Services. Audit's enquiries indicated that there was no written agreement between the ISD and the RTHK about the use of RTHK's airtime for broadcasting APIs for the Government (paras. 2.27 to 2.30).

F. **Potential savings in placing newspaper advertisements.** The ISD is the agent for the Government for the placement of newspaper advertisements. Audit notes that an annual saving of about \$2.9 million on advertising in newspapers can be achieved if there is no duplication of part of the contents of various government notices (paras. 3.2 to 3.8). Audit also notes that, in July 1999, the ISD had the support of the Civil Service Bureau on a proposal of reducing the size of recruitment advertisement to be placed in an English newspaper, which could bring a saving of about \$2.5 million a year. However, the ISD has not yet implemented this cost-saving measure. Audit further notes that there is considerable duplication of part of the contents of recruitment advertisements (paras. 3.12 to 3.19).

G. **Improvements needed in the planning and evaluation of publicity campaigns.** The results of a publicity campaign are commonly measured by the level of awareness, and changes in public perception/behaviour. However, these two generally accepted quantitative performance indicators had not been used and targets for these indicators had not been set at the planning stage for nine of the ten major publicity campaigns mounted by the ISD in 1999-2000, and for a large number of publicity campaigns conducted by various bureaux and departments (paras. 4.2 to 4.11). Furthermore, Audit notes that a pre-testing procedure (a procedure which checks the likely reactions of target audience to the ideas and designs before producing the final version of the API) is not normally used by the ISD in designing and producing short films of APIs (paras. 4.15 to 4.20).

H. In June 1998, the ISD appointed a consultant to conduct surveys to assess the effectiveness of eight government publicity campaigns and to identify areas for improvement. However, Audit noted that the scope of the evaluation exercise was significantly reduced. Hence, the original objectives of providing the funds for the evaluation were not met (paras. 4.24 to 4.28). According to the consultant's proposal, there would be three rounds of survey to give "pre", "during" and "post" campaign measurements of changes in level of awareness and perception of the target audience. Audit noted that nine APIs (38%) of the 24 APIs involved had already been launched before the first round of the survey. Therefore, no pre-campaign measurement could be made of these APIs. This defeated the purpose of establishing a baseline measurement for comparison with the "during" and "post" campaign measurements (paras. 4.29 and 4.30).

I. The accountability for the publicity expenditure currently rests with the Controlling Officers concerned. The ISD, as the Government's publicity adviser, can render more help to departments, particularly small departments, to prepare detailed campaign strategies to enable them to discharge their duties effectively (paras. 4.33 and 4.34).

J. **Selling of government publications.** The use of electronic services has the benefits of improving efficiency and widening the reach of public services, and reducing the cost of the publications in the longer term. An Electronic Service Delivery (ESD) Scheme is available from the latter half of 2000 for delivery of a number of public services. There is a need for the ISD to use the ESD Scheme for sale of government publications as early as possible. As an alternative to selling hardcopies, the ISD should explore the viability of selling government publications in softcopy via the Internet at an early date (paras. 5.2 to 5.8).

K. **Audit recommendations.** Audit has made the following main recommendations.

— the Director of Information Services should:

- (i) put in place an effective mechanism for monitoring television and radio channels to ensure that APIs are broadcast in accordance with the ISD schedules (first inset of para. 2.23);
- (ii) coordinate with all user departments to enable them to redesign the form and contents of their advertisements with a view to reducing the size of printed advertisements by eliminating contents that have identical wording (para. 3.9);
- (iii) implement immediately the cost-saving measures already agreed with the Civil Service Bureau to reduce the size of recruitment advertisement in English newspapers (first inset of para. 3.20);
- (iv) provide adequate guidelines to bureaux and departments to enable them to set measurable targets for the commonly used performance indicators at the planning stage of a publicity campaign (para. 4.12);
- (v) urge government bureaux and departments to adopt pre-testing to test the likely reactions of the target audience of APIs (first inset of para. 4.21);
- (vi) ensure that the objectives of the evaluation survey of publicity campaigns are achieved, and that there is proper planning of the timing of conducting evaluation surveys (first and third insets of para. 4.31);

- (vii) provide adequate guidelines to departments to assist them in managing publicity programmes, and provide appropriate training for departments on the planning, organising and conducting of publicity campaigns (first and second insets of para. 4.35); and
 - (viii) use the ESD Scheme as soon as possible for selling government publications, and explore the feasibility of selling government publications in softcopy form via the Internet (para. 5.9);
- the Commissioner for Television and Entertainment Licensing should:
- (i) take action to ensure that television and radio stations will make up for any APIs they have omitted to broadcast or wrongly broadcast, and where it is established that a licensee has omitted to broadcast or wrongly broadcast APIs scheduled by the ISD, consider recommending to the BA to issue advisory or warning letters to the licensee (first and second insets of para. 2.24); and
 - (ii) take more stringent action against licensees who repeatedly fail to broadcast APIs in accordance with the ISD schedules (third inset of para. 2.24); and
- the Director of Broadcasting should:
- (i) in conjunction with the Director of Information Services, work out a formal arrangement for using the RTHK's airtime to broadcast APIs (para. 2.32); and
 - (ii) broadcast APIs in accordance with the requirements of the agreed arrangement reached with the ISD (first inset of para. 2.33).

L. **Response from the Administration.** The Director of Information Services welcomes the audit recommendations. The Commissioner for Television and Entertainment Licensing and the Director of Broadcasting agree with the audit recommendations.

PART 1: INTRODUCTION

1.1 Publicity is an important feature of modern government. Like other governments in the world, the Government uses publicity to clarify and explain the impact of government policies and legislation to the public, inform them the various services government departments and non-governmental organisations provide, and educate the public about their civic rights and responsibilities. Whether the message achieves the intended results depends on a number of factors, including the target audience reached and the acceptance of the contents by the target audience.

Role of Information Services Department

1.2 The Director of Information Services advises on and formulates the Government's overall public relations strategy, locally and overseas. The Information Services Department (ISD) serves as the Government's advertising and news agency, public relations consultant, publicity campaign adviser, and publisher.

1.3 The Publicity Division of the ISD is responsible for government publications, promotional campaigns, advertisements, creative and design work and government photography. The Division provides support for the ISD and other government departments and acts as an executive arm for public service advertising.

Government publicity

1.4 The Government mounts a number of major publicity campaigns each year to promote public awareness of important issues. A major publicity campaign is normally a continuous process throughout the year, employing a wide range of publicity measures and advertising means. They include broadcasting Announcements in the Public Interest (APIs) on television and radio, roving exhibitions, large-scale community involvement activities and advertising on newspapers and the Internet. The notional airtime cost to the Government for broadcasting APIs on television and radio is estimated at \$418 million for 1999-2000 (see Table 1 in paragraph 2.7 below).

1.5 In 1999-2000, the funds allocated for major promotion efforts across the Government were about \$340 million. However, it is difficult to ascertain the exact total amount of expenditure on government publicity because it includes various departmental publicity activities. It is also difficult to ascertain the total indirect costs (such as staff cost) which are not separately accounted for in these activities.

Funding system

1.6 Prior to the 2000-01 Resource Allocation Exercise, resources for publicity campaigns were sought under a dual system, as follows:

- **ISD publicity vote.** Bureaux and departments submitted proposals to the ISD. If selected by the Information and Public Relations Policy Group (IPRPG) of the Chief Secretary for Administration's Committee, these activities would be funded under the ISD vote and carried out with full ISD support; and
- **Departmental vote.** Bureaux and departments secured from the Finance Bureau project-based resources in their votes (capital account or general departmental expenses) for undertaking publicity activities. Bureaux and departments could also approach the ISD for professional support.

Starting from the 2000-01 Resource Allocation Exercise, the arrangements for the ISD to provide funds under the ISD publicity vote have ceased. A new funding system has been introduced whereby all funding for undertaking publicity and community education activities is provided under the departmental vote. The Finance Bureau and the ISD jointly examine the bids for funding and make recommendations to the IPRPG. Subject to the IPRPG's direction, the recommended bids are supported for funding allocation.

1.7 Under the new funding system, the ISD provides technical support for publicity campaigns in a similar way as before. The new system aims at ensuring that all publicity/community education activities of the Government are fully coordinated and timed to achieve the desired impact.

1.8 There are a few departments with ongoing publicity needs, e.g. the Independent Commission Against Corruption (ICAC) and the Hong Kong Police Force (Police). They already have recurrent expenditure under a departmental publicity vote. The revised funding system does not affect the recurrent financial provision for these departments.

Audit review

1.9 Audit has recently conducted a review on the management of government publicity programmes, which involves the planning, organising and monitoring of these programmes. Audit has observed that there is room for improvement in the following areas:

- the use of free airtime provided by television and radio stations for broadcasting APIs (Part 2);
- the placement of newspaper advertisements (Part 3);
- the planning and evaluation of publicity campaigns (Part 4); and
- the selling of government publications (Part 5).

PART 2: USE OF FREE AIRTIME PROVIDED BY TELEVISION AND RADIO STATIONS FOR BROADCASTING APIs

2.1 This PART examines whether the Government is making good use of the free airtime provided by broadcasting licensees (i.e. the local commercial television and radio stations) and by the Radio Television Hong Kong (RTHK).

2.2 Broadcasting of APIs on television and radio is an important means of disseminating messages for government publicity campaigns. APIs, as defined by the Broadcasting Authority (BA — Note 1), should include messages that:

- inform the public of important health and safety measures, or legislative changes affecting their interests;
- educate the public as to their rights and responsibilities as citizens; and
- enlist public cooperation in tackling important social and environmental problems.

Licence requirements to broadcast APIs

2.3 Under the conditions of the relevant licences to broadcast, two commercial television broadcasting licensees (hereinafter referred to as Licensees A and B) and two commercial radio broadcasting licensees (hereinafter referred to as Licensees C and D) are required to broadcast on each of their channels such APIs as the BA requires them to broadcast, provided that such APIs do not exceed one minute in total in any clock hour (i.e. the period of time counting from the first to the last second of an hour, and hereinafter referred to as an hour). As for another commercial television broadcasting licensee (hereinafter referred to as Licensee E), under the licence, the BA has directed Licensee E to broadcast a maximum of one minute of APIs, including weather-related messages provided by the Hong Kong Observatory, per every two hours per channel (Note 2).

Note 1: *The BA is a statutory body comprising nine non-official members and three government officers. It is responsible for the control and regulation of the commercial television and sound broadcasting industry.*

Note 2: *The requirement to broadcast APIs does not apply to the pay-per-view channels and the acquired channels (e.g. BBC World).*

2.4 Under the Broadcasting Authority Ordinance (Cap. 391), as the executive arm of the BA, the Television and Entertainment Licensing Authority (TELA) is vested with the authority to investigate and to examine whether there are any possible breaches of the licence conditions. If there appears to be prima facie evidence of a possible breach of the licence conditions, the TELA would refer the case to the BA. The BA, after careful examination, may issue advice or warning letters to the licensees concerned. The BA is empowered under section 28 of the Broadcasting Ordinance (Cap. 562) and section 24 of the Broadcasting Authority Ordinance to impose financial penalties upon a licensee who has failed to comply with the Ordinances or any licence conditions. A licensee who is aggrieved by any decision of the BA may appeal by way of petition to the Chief Executive in Council.

2.5 The ISD is responsible for coordinating the placement of all government and non-government APIs for broadcasting during the allocated airtime. Short APIs, mostly lasting for 30 seconds or less, covering various government publicity campaigns are produced by the ISD or non-government organisations. The ISD prepares and sends a monthly schedule to the television licensees and a weekly schedule to the radio licensees on API broadcasting, listing the codes and timing of the APIs to be broadcast. The schedule is priority-based for synchronising the timing and launching of specific government publicity campaigns.

2.6 The TELA has been delegated the authority to direct the licensees to broadcast the API schedules prepared by the ISD. The TELA regularly sends letters to the licensees requiring them to broadcast the APIs on each channel in accordance with the ISD schedule.

2.7 According to the ISD monthly/weekly schedules, the estimated notional cost of the total airtime for broadcasting APIs in 1999-2000 (Note 3) is at Table 1 below.

Note 3: *In calculating the notional costs of airtime, Audit adopts the lowest advertising rates quoted by the respective broadcasting licensees for a particular time zone. Advance commitment discounts and volume rebates are also applied, where appropriate, to arrive at a prudent estimate of the notional cost of airtime.*

Table 1

**Estimated notional cost of airtime
for broadcasting APIs in 1999-2000**

Broadcasting licensee	Airtime in minutes	Notional cost (\$ million)
A (TV station)	12,100	156
B (TV station)	11,900	108
C (Radio station)	24,800	46
D (Radio station)	26,300	47
E (TV station)	35,000	61
Total	<u>110,100</u>	<u>418</u>

Source: Audit's computation based on ISD's records

Note: This notional cost is calculated on the basis that, if the condition of the television or radio station licences had not included a requirement to broadcast APIs, the Government, like other advertisers in the private sector, would have had to purchase the airtime from these broadcasting stations.

TV API schedules not followed

2.8 As shown in Table 1 above, the airtimes of Licensees A and B have the highest notional cost for broadcasting APIs. In April 2000, Audit conducted an examination to ascertain whether Licensees A and B had broadcast the TV APIs in accordance with the ISD schedules. Audit selected the TV API schedules prepared by the ISD for these two licensees for the first week of May, August and November 1999, and February 2000, and checked the schedules against the broadcasting records.

2.9 The results of the audit examination showed that the two licensees had not followed the TV APIs schedules provided by the ISD as directed by the TELA under the broadcast licences. Details are given in paragraphs 2.10 and 2.11 below.

2.10 *Omissions to broadcast scheduled APIs.* Under the licence conditions, the two television licensees are directed to broadcast one minute of APIs in any one hour. Since most of the TV APIs have a programming time of 30 seconds, the ISD schedules require the licensees to broadcast two TV APIs in any one hour of television programming. Audit checked whether there

were any omissions in the number of TV APIs during the four weeks mentioned in paragraph 2.8 above. Audit noted that the Chinese TV Channel of Licensee B (hereinafter referred to as B1 Channel) had omitted to broadcast 148 scheduled APIs (i.e. 13% of the total 1,176 scheduled APIs). In a further analysis of the 148 omitted APIs, Audit noted that 56 were scheduled for broadcasting during the prime time programming hours (i.e. from 6 p.m. to 10:59 p.m. daily). As the ISD had scheduled a total of 280 APIs for prime time broadcasting by the B1 Channel, the omitted APIs accounted for 20% (i.e. 56 of 280) of the prime time APIs. The rate of omission by the B1 Channel during prime time was significant.

2.11 *Broadcasting wrong TV APIs.* Audit also checked whether the television stations had broadcast the particular APIs at the specified times in accordance with the schedules prepared by the ISD. Audit found that, on many occasions Licensees A and B had broadcast a wrong API within the scheduled hour. For about 10% of the APIs aired, these two licensees had broadcast a wrong API. A summary of such cases is shown in Table 2 below.

Table 2

Summary of broadcasting wrong APIs

TV-Channel	Number of APIs scheduled by ISD for broadcasting	Number of APIs wrongly broadcast	Percentage of wrong APIs broadcast
	(a)	(b)	(c) = $\frac{(b)}{(a)} \times 100\%$
Licensee A			
A1 Channel	1,176	132	11%
A2 Channel	<u>704</u>	<u>85</u>	<u>12%</u>
	<u>1,880</u>	<u>217</u>	12%
Licensee B			
B1 Channel	1,176	103	9%
B2 Channel	<u>672</u>	<u>64</u>	<u>10%</u>
	<u>1,848</u>	<u>167</u>	9%
Total	<u><u>3,728</u></u>	<u><u>384</u></u>	10%

Source: ISD's records

Note: The period covered is the first week of May, August and November 1999, and February 2000.

Audit observations on broadcasting TV APIs

2.12 Television is a very effective means of reaching the mass audience for government publicity. The results of the audit examination indicated that the B1 Channel had omitted to broadcast 20% of the scheduled APIs during the prime time programming hours. **Based on the rates for television advertisements prevailing in 2000, Audit estimates that the notional cost of the airtime for the omitted TV APIs by the B1 Channel was about \$15 million a year (see Appendix A).**

2.13 Furthermore, Licensees A and B had wrongly broadcast about 10% TV APIs. Since the APIs schedules were prepared by the ISD on a priority basis for dovetailing with the timing of launching specific government publicity campaigns, non-compliance with the schedules could adversely affect the effectiveness of the government publicity campaigns. The audit examination indicated that a proper monitoring system was lacking for ensuring that the TV APIs for various government publicity campaigns had been broadcast strictly in accordance with the ISD schedules.

2.14 Audit considered that there was an urgent need for the TELA and the ISD to take prompt action to rectify the unsatisfactory situation. In May 2000, Audit informed the TELA and the ISD of the audit findings, particularly the lack of a proper monitoring system to ensure that the TV APIs for various government publicity campaigns were broadcast according to the ISD schedules.

Remedial measures taken

2.15 In response, both the TELA and the ISD agreed to the need for monitoring the broadcasting of APIs by commercial television and radio licensees. In May 2000, the ISD implemented a sample checking system. The TELA has reminded broadcasting licensees that they are required to broadcast the APIs in accordance with the ISD schedules, as directed by the BA. When non-compliance or discrepancies are detected, the ISD will refer them to the TELA for investigation and consideration of referral to the BA for necessary action. The monitoring system covers the APIs to be broadcast by the licensees of all the local commercial television and radio stations.

Further audit observations

2.16 Audit welcomes the implementation of a monitoring mechanism by the ISD to check the broadcasting of APIs. However, Audit noted that:

- there were deficiencies in the mechanism for monitoring API broadcasting (paragraphs 2.17 to 2.22 below); and
- the ISD did not have any written agreement with the RTHK for API broadcasting on the RTHK's radio channels (paragraphs 2.27 to 2.31 below).

Deficiencies in the monitoring mechanism

2.17 There are 21 commercial television and radio channels which are required to broadcast APIs under the conditions of the relevant licences. They broadcast a total of 14,576 hours of programmes every month. They are required to broadcast APIs during these broadcasting hours in accordance with the ISD monthly/weekly schedule. The system adopted by the ISD for monitoring API broadcasting since May 2000 works as follows:

- *Licensees A and B.* The ISD uses the API Daily Reports (Note 4) for carrying out sample checks; and
- *Licensees C, D and E.* The ISD uses the recording tapes of the television and radio programmes which have been aired for carrying out sample checks.

2.18 A summary of the average sample checks of APIs broadcast, carried out in a month by the ISD for the six-month period from May to October 2000, is set out at Table 3 below.

Note 4: *The TELA employs an independent agent to prepare daily records of television programmes aired on the channels of Licensees A and B at a cost of about \$336,000 a year. These records contain, among other things, API Daily Reports. This agent also prepares daily records of broadcast of commercial advertisements for the private sector. However, at present, the service of logging the television broadcast is limited to the channels of Licensees A and B.*

Table 3

ISD's sample checks on APIs broadcast from May to October 2000

Sample checks based on	Channel of	Average total number of broadcasting hours each month	Average number of hours checked each month	Percentage of hours checked each month
		(a)	(b)	(c) = $\frac{(b)}{(a)} \cdot 100\%$
API Daily Reports	Licensee A	1,234	163	13%
	Licensee B	1,222	166	14%
	Total	<u>2,456</u>	<u>329</u>	13%
Recording tapes	Licensee C	2,040	1.0	0.05%
	Licensee D	2,160	0.8	0.04%
	Licensee E	7,920	5.3	0.07%
	Total	<u>12,120</u>	<u>7.1</u>	0.06%

Source: Audit's analysis based on ISD's records

2.19 It can be seen from Table 3 above that the ISD checked on average 7.1 hours a month of the programmes aired through the channels of Licensees C, D and E. This represented only 0.06% of the 12,120 hours of programmes. The sample size was too small for the effective monitoring of Licensees C, D and E to ensure that they had broadcast the APIs according to the schedules provided by the ISD.

2.20 The small sample size was mainly due to the time-consuming nature of checking the recording tapes. In contrast, on average the ISD managed to sample check 329 hours (13%) a month of the programmes aired through the channels of Licensees A and B. The much larger sample size was achieved with the help of the API Daily Reports. In this connection, Audit notes that under section 39(4) of the Broadcasting Ordinance and section 22(1)(a) of the Broadcasting Authority Ordinance, the BA may require the licensees to supply relevant information and to produce for examination any relevant records.

2.21 Audit also noted that the following television/radio channels were not covered by the sample checks carried out during the six-month period from May to October 2000:

- one (out of three) channel of Licensee C, namely the English channel;
- one (out of three) channel of Licensee D, namely the English channel; and
- four (out of eleven) channels of Licensee E. These included two movie channels, a horse racing channel and a composite channel.

Audit considers that all the licensed television and radio channels which are required to broadcast APIs should be covered by the ISD's system of sample checks in any given period (say three months). If any non-compliance or discrepancies are detected, such cases should be referred immediately to the TELA for investigation and action. In this connection, the TELA has directed Licensees A, B, C and D to retain recorded tapes of programmes for 90 days and Licensee E for 60 days.

2.22 The monitoring system by sample checks has been in place since May 2000. The checking procedures issued by the ISD do not provide sufficient guidelines on the particular channels to be covered and the extent of sample checks. Audit considers it important that the ISD should issue clear departmental guidelines to its staff for the effective implementation of the monitoring system.

Audit recommendations on deficiencies in the monitoring system

2.23 **Audit has *recommended* that the Director of Information Services should:**

- **put in place an effective mechanism for monitoring television and radio channels to ensure that APIs are broadcast in accordance with the ISD schedules;**
- **explore and adopt viable and efficient means of monitoring the APIs broadcast on the channels of Licensees C, D and E (e.g. this can be done by requiring the licensees to provide records of APIs broadcast);**

- increase the size of samples for sample checking to monitor the APIs broadcast on the channels of Licensees C, D and E, having regard to the cost-effectiveness of such checks. In this connection, all relevant television and radio channels should be covered during the period (say three months) selected for the sample checks; and
- incorporate specific checking requirements (including the extent of sample checks) into the guidelines on the particular channels to be covered, so as to effectively monitor all APIs broadcast by local television and radio stations.

2.24 Audit has also *recommended* that the Commissioner for Television and Entertainment Licensing should:

- take action to ensure that television and radio stations will make up for any APIs they have omitted to broadcast or wrongly broadcast;
- where it is established that a licensee has omitted to broadcast or wrongly broadcast APIs scheduled by the ISD, consider recommending to the BA to issue advisory or warning letters to the licensee; and
- as a deterrent, take more stringent action (e.g. consider recommending the imposition of financial penalty by the BA) against licensees who repeatedly fail to broadcast APIs in accordance with the ISD schedules.

Response from the Administration

2.25 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendations;
- (b) the ISD, in consultation with the TELA, is working on improvements to the system of sample checking the broadcast of APIs on television and radio to ensure adherence to the ISD schedules. Steps are being taken to finetune the existing mechanism including requesting, through the TELA, the commercial television and radio stations to supply broadcasting logs to facilitate checking. Advice from relevant departments is being sought on the appropriate sample size for checking having regard to cost-effectiveness;

- (c) as a further step to explore more efficient mechanisms, the feasibility of checking TV APIs broadcast by using computerised systems is a topic being studied under the ISD's Information Systems Strategy Review; and
- (d) in the meantime, the sample checking system will continue. Guidelines have been issued to the ISD staff to monitor all relevant channels.

2.26 The **Commissioner for Television and Entertainment Licensing** has said that:

- (a) the TELA will continue to work with the ISD to refine and improve the sample checking system. In response to the TELA's request, all licensees have agreed to provide broadcasting records of APIs on their services which will greatly facilitate sample checking; and
- (b) where the ISD notes any discrepancy between the actual broadcast and the schedule of APIs, it will refer the case to the TELA for investigation. The TELA will deal with such complaints in accordance with its established complaint handling procedures. The TELA will give licensees a reasonable opportunity to make oral and/or written representations. All materials related to the complaint cases would be referred to the Broadcasting Authority Complaints Committee which will then make recommendations on the complaints to the BA. Taking into consideration the nature, seriousness and circumstances of the contravention, the BA may impose a range of sanctions, including advisory letters, warnings and financial penalties.

API broadcasting on RTHK

2.27 The RTHK operates seven radio channels (Note 5). The ISD sends weekly schedules of APIs (to be broadcast in Cantonese and English) to the RTHK for broadcasting one minute of APIs in each hour on the Cantonese (i.e. RTHK Radio 1, 2 and 5) and English (i.e. RTHK Radio 3) channels.

Note 5: *The seven channels are:*

- *for broadcasting in Cantonese, RTHK Radio 1, 2 and 5;*
- *for broadcasting in Putonghua, RTHK Radio 7;*
- *for broadcasting in English, RTHK Radio 3;*
- *for broadcasting in both Cantonese and English, RTHK Radio 4; and*
- *for relaying the BBC World Service, RTHK Radio 6.*

Audit observations on broadcasting APIs by RTHK

2.28 In the instructions issued to commercial radio stations for broadcasting APIs, the TELA specifies the requirements of broadcasting the ISD scheduled APIs for each channel of radio service (see paragraph 2.5 and 2.6 above). However, as a government department, the RTHK does not require a licence from the TELA. Therefore, the ISD forwards API broadcasting schedules direct to the RTHK. **There were no clear requirements issued by the ISD for the RTHK to broadcast the scheduled APIs in Cantonese on all of its three Cantonese channels. Audit noted that the RTHK broadcast the ISD scheduled APIs in Cantonese on any one of its three Cantonese channels (i.e. RTHK Radio 1, 2 or 5), instead of broadcasting them on all three channels. The RTHK considered that the ISD requirement was fulfilled if, in one hour, any one of the three Cantonese channels broadcast one minute of APIs.**

2.29 Audit also noted that the weekly schedule of APIs sent to the RTHK by the ISD did not cover the Putonghua channel (RTHK Radio 7), the bilingual channel (RTHK Radio 4) and the channel relaying the BBC World Services (RTHK Radio 6). The ISD informed Audit that it would provide a weekly schedule of APIs for the Putonghua channel starting from February 2001 and the RTHK would broadcast the APIs accordingly.

2.30 Audit's enquiries indicated that there was no written agreement between the ISD and the RTHK about the use of airtime for broadcasting APIs. The RTHK was not obliged (e.g. in the form of a licence) to broadcast APIs. It was only a matter of practice that the ISD sent to the RTHK weekly schedules of APIs in Cantonese and English for broadcasting. However, Audit expressed the view that the RTHK, as a government department, had an important role to play in broadcasting APIs for government publicity campaigns.

2.31 The RTHK keeps internal records on the broadcasting of APIs for the three Cantonese channels. However, these records are not available to the ISD for it to monitor whether the scheduled APIs have been broadcast. Furthermore, as the RTHK does not keep records of APIs broadcast on its English channel, Audit cannot ascertain whether the APIs in English have been broadcast according to the time schedules prepared by the ISD. In response to Audit's enquiries, the RTHK has confirmed that English APIs are regularly broadcast on its English channel.

Audit recommendations on broadcasting APIs by RTHK

2.32 **Audit has *recommended* that the Director of Information Services and the Director of Broadcasting should work out a formal arrangement for using the RTHK's airtime to broadcast APIs as frequently as required of commercial radio stations. The arrangement should:**

- **contain provisions setting out clearly the airtime to be allocated to broadcasting APIs on each RTHK radio channel and the broadcasting requirements; and**
- **stipulate the frequency of broadcasting of APIs on each RTHK channel.**

2.33 **Audit has also *recommended* that the Director of Broadcasting should:**

- **broadcast APIs in accordance with the requirements of the agreed arrangement between the RTHK and the ISD; and**
- **keep adequate records to facilitate monitoring whether the API broadcasting requirements have been complied with.**

Response from the Administration

2.34 The **Director of Information Services** has said that the ISD has reached an agreement with the RTHK, in the form of a memorandum, that the RTHK will follow the same requirement for broadcasting the ISD scheduled APIs as required of the other two commercial radio stations.

2.35 The **Director of Broadcasting** has said that he wholly agrees with the recommendations. The RTHK has reached an agreement with the ISD to broadcast one minute of APIs for each hour on each channel, with the exceptions of Radio 4 (which often relays classical music concerts) and Radio 6 (which relays the BBC World Service 24-hour live).

PART 3: PLACEMENT OF NEWSPAPER ADVERTISEMENTS

3.1 This PART examines whether there is scope for economy in the placement of newspaper advertisements.

Background

3.2 The ISD acts as the executive arm of the Government with regard to public service advertising (see paragraph 1.2 above). In accordance with General Regulation 575 on advertising and press notifications, no advertising matter or press notice may be sent to any newspaper except by the Director of Information Services. This is a specific requirement, despite the fact that many bureaux and departments have their own advertising or publicity vote.

3.3 In 1999-2000, the Government spent about \$83 million on newspaper advertisements, which may be grouped into the following two main categories:

- statutory notices and other government notices; and
- recruitment advertisements.

Duplication of contents in government notices

3.4 The cost of placing a newspaper advertisement is directly proportional to the size of the printed advertisement. Audit conducted an examination of government advertisements placed on newspapers. Audit noted that in similar government notices published in the same newspaper on the same day, there was considerable duplication of the contents. The same wording appeared in separate notices of the same nature. Examples are in paragraphs 3.5 to 3.7 below.

Notices under the Crimes Ordinance

3.5 As an example, a notice is required to be published under section 153A(1)(b)(ii)(B) of the Crimes Ordinance (Cap. 200) relating to “closure of premises” when a person has been convicted by a court of an offence under sections 139, 143, 144 or 145 of the Crimes Ordinance. The notice has to be published in one newspaper in Chinese and one in English. Publication of these notices costs between \$3 million to \$4 million a year. Each published notice contains the following two main pieces of information:

- the details of the premises concerned; and
- the full text of sections 139, 143, 144 or 145 of the Crimes Ordinance.

3.6 Audit has noted that when a number of notices for the closure of a number of premises appeared in the same newspaper on the same day, which was usually the case, the identical text of the above sections of the Crimes Ordinance was published in each notice. The text of the Crimes

Ordinance typically occupied about 80% of the area of the notice. If the text of the Crimes Ordinance had only been printed once, but with reference to the premises concerned and separately itemised in the advertisement, duplication would have been avoided and the total size of the advertisements would have been reduced significantly. This would also have reduced the advertising costs considerably. Upon Audit's enquiries in October 2000, the Police stated that the Crimes Ordinance provided that each published notice should set out the details of the premises concerned and the particular sections of the Ordinance. In view of this, the Police and the Department of Justice proposed to amend the relevant section of the Crimes Ordinance to enable the publishing of a single text of these sections together with multiple notices. Amendment to the Crimes Ordinance was enacted in June 2000. Audit notes that, as from January 2001, the Police has revised the notices published in newspapers under the Crimes Ordinance. Because of the reduction in the size of the advertisements, the potential cost saving as estimated by the Police would be about \$2 million a year.

Other government notices

3.7 Audit notes that for newspaper advertisement of government notices of other government departments, if common details appear only once in a newspaper on the same day, similar potential savings can also be achieved. Examples of such government notices are listed in Table 4 below. (The Crimes Ordinance case is also included in Table 4 to show the extent of possible size reduction.)

Table 4

Possible size reduction in government notices

Department	Type of notice	Possible size reduction (Note)
Immigration Department	Notice of seizure of ships, Immigration Ordinance (Cap. 115)	60%
Hong Kong Police Force	Warning notice of closure of premises, Crimes Ordinance (Cap. 200)	50%
Official Receiver's Office	Notice regarding bankruptcy and companies winding-up proceedings	37%
Government Property Agency	Tender notice for advertising licences of government multi-storey carpark buildings	32%
Lands Department	Tender notice of letting of government land	29%

Source: Audit's calculation based on ISD's records

Note: In assessing the extent of possible size reduction, Audit has used the layout, font sizes, and line spacings of the original notices. No key information has been deleted.

Audit observations and recommendations on government notices in newspapers

3.8 General Regulation 575 provides that no advertisement may be sent to any newspaper except by the Director of Information Services. Audit notes that considerable savings on advertising in newspapers can be achieved if there is no duplication of the identical contents of various government notices. If the extent of size reduction as suggested in Table 4 in paragraph 3.7 above is adopted, Audit estimates that there will be a saving of about \$2.9 million a year in newspaper advertising (see computation at Appendix B).

3.9 To achieve economy in placing advertisements and government notices in newspapers, Audit has recommended that the Director of Information Services should coordinate with all user departments to enable them to redesign the form and contents of their advertisements with a view to reducing the size of the printed advertisements by eliminating contents that have identical wording.

Response from the Administration

3.10 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendations. The ISD is in consultation with the departments concerned to explore the feasibility of reducing the size of printed advertisements of their notices; and
- (b) the ISD has requested all bureaux and departments to critically examine the feasibility of displaying same details once and centrally in all newspaper advertisements taking into account the cost and effectiveness of the advertising exercise. The ISD will advise on the design and assist in the placement of the advertisements whenever necessary.

3.11 The responses from the four user departments involved in Table 4 in paragraph 3.7 above are summarised in Table 5 below.

Table 5

Responses from user departments

Department (Note)	Response
Immigration Department	Audit's recommendation is supported. The Department of Justice has confirmed there is no legal objection to the proposal.
Official Receiver's Office	The combined notice method has already been adopted where appropriate.
Government Property Agency	The Agency agreed with Audit's recommendation. It has been the practice to group tender notices together in the press to achieve economy of scale. The tender notices referred to in the audit report were due to an oversight, and part of their contents should have been combined.
Lands Department	Audit's recommendation is acceptable in principle. The Department will reduce the size of its notices whenever possible. However, the disposal of land should be in a timely, fair and remunerative manner. The sum of money involved in these tenders is potentially large. The process of the tender should not be delayed merely for the purpose of placing a composite advertisement. On this basis, it will follow up Audit's recommendation.

Note: The Police has reduced the size of the notices published in newspapers under the Crimes Ordinance since January 2001 (see paragraph 3.6 above).

Recruitment advertisements

3.12 Under General Regulation 575, all advertisements inviting applications for appointment to the public service should be published in accordance with the format and procedures as may be promulgated by the Secretary for the Civil Service. According to the Civil Service Bureau (CSB), the objective of recruitment advertising is publicising widely information on job vacancies to reach out to target candidates and to ensure openness of recruitment to government jobs.

3.13 It has been a long-standing practice of the Government to place recruitment advertisements in both English and Chinese newspapers. The ISD used to enter into bulk contracts separately with two newspapers, one in Chinese and one in English (hereinafter referred to as Newspaper A for Chinese and Newspaper B for English) for the placement of centrally-coordinated recruitment advertisements for vacancies on Saturdays. The purpose of entering into bulk contracts with local newspapers is to obtain favourable advertising rates for government bureaux and departments. They can place recruitment advertisements by means which they consider appropriate and effective, including through the ISD's bulk contracts. Where justified, recruitment advertisements may be placed in other newspapers, magazines or through other means.

3.14 In March 1999, in assessing the cost-effectiveness of the advertising services provided by the two newspapers, the ISD found that the advertising rate offered by Newspaper B was "a bit high", and that the usual placement of a full-page advertisement was too expensive. The ISD estimated that, if the size of recruitment advertisements in English was reduced from a full-page to a quarter-page, there should be a possible saving of about \$2.5 million a year.

3.15 In June 1999, the ISD proposed to the CSB a simplified layout for recruitment advertisements in English. The simplified layout contained only key information and follow-up details (e.g. telephone numbers, fax numbers, e-mail addresses and the recruiting department's Internet home page). In July 1999 (i.e. seven months before the expiry of the prevailing bulk contract with Newspaper B in February 2000), the CSB informed the ISD that it supported the ISD's proposal, so long as the key information and follow-up details were provided. The CSB considered that it would be reasonable for job seekers to seek additional information from the follow-up details shown in the advertisements. Despite the fact that approval was obtained in July 1999, the ISD did not implement the cost-saving proposal.

3.16 In February 2000, following a tendering exercise, the ISD entered into a bulk contract with Newspaper A for 25 months from 1 March 2000 to 31 March 2002 for the placement of centrally-coordinated recruitment advertisements in Chinese on Saturdays. The estimated cost of the contract was a special price of \$130,000. The ISD did not enter into a bulk contract for the placement of recruitment advertisements in English because it was found that the advertising rate under a bulk contract with Newspaper B was similar to that of placing advertisements on an ad hoc basis (i.e. without a bulk contract). The ISD estimated that the cost of placing ad hoc recruitment advertisements on Saturdays with Newspaper B for 25 months (from March 2000 to March 2002) was \$6 million. The actual cost of placing ad hoc recruitment advertisement in Newspaper B was \$4.6 million for the ten months from March to December 2000.

3.17 In March 2000, after deciding not to enter into a bulk contract for placing recruitment advertisements in English upon the expiry of the previous contract with Newspaper B, the ISD agreed with the CSB that:

- there would be no centrally-coordinated government recruitment advertisements in an English newspaper. Departments which wished to place recruitment advertisements in English should make separate arrangements through the ISD with the newspapers concerned;
- an advertisement would be placed in a “notice” form in the classified section of an English newspaper on Saturdays. This advertisement would provide a comprehensive list of job vacancies, and publicise the Government website through which readers could access details of these vacancies; and
- commencing from 1 March 2000, the Government Information Centre Internet Homepage Index would have a special icon featuring “Government Vacancies”. Job seekers can access the full details of government vacancies by viewing the Homepage.

3.18 In April 2000, the CSB informed all other bureaux and departments of the above arrangements. However, the cost-saving proposal for a simplified layout for recruitment advertisements in English has still not been implemented.

Audit observations and recommendations on recruitment advertisements

3.19 The cost of advertising in newspapers is high, and there is an increasingly and more common use by the general public of the Internet for obtaining information (including job vacancies information) from the government website. Audit notes that there is considerable duplication of some parts of the contents in the newspaper recruitment advertisements, such as information relating to “how to apply” and “general notes”. These common details should appear only once in the newspaper advertisements of that day in order to save advertising space and cost. Furthermore, nowadays newspaper readers are usually asked to refer to the Government’s website for details of recruitment procedures.

3.20 **Audit has *recommended* that the Director of Information Services should:**

- **implement immediately the cost-saving measures already agreed with the CSB in order to reduce the size of recruitment advertisement in English newspapers; and**
- **discuss with the CSB to ascertain whether the cost-saving measures for reducing the size of advertisement can be applied to recruitment advertisements in Chinese newspapers.**

Response from the Administration

3.21 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendations;
- (b) since the expiry of the previous bulk contract with Newspaper B on 29 February 2000, a centrally-coordinated notice was placed in another English newspaper to notify members of the public of the job vacancies available and invite them to check the Government's website where details can be obtained. The net result of the reduced size of the advertisement in this English newspaper is similar to the cost-saving measures previously agreed. Furthermore, these notices are paid for by rebates from this newspaper and are effectively free to the Government; and
- (c) the ISD will discuss with the CSB to explore the feasibility of introducing other cost-saving measures.

3.22 The **Secretary for the Civil Service** has said that the CSB has noted the audit observations and recommendations. The CSB would be happy to discuss with the ISD proposals to improve and streamline the current arrangements, having regard to the objective of recruitment advertisements to reach out to target candidates. The CSB will also continue to provide departments with the flexibility to decide the appropriate and effective means to publicise their vacancies for recruitment.

PART 4: PLANNING AND EVALUATION OF PUBLICITY CAMPAIGNS

4.1 This PART examines whether there is room for improvement in planning and evaluating government publicity campaigns.

4.2 Media planning is the process of determining how a publicity campaign can be most effectively implemented to communicate the required message to the target audience. Proper planning includes setting of clear objectives and performance targets to evaluate and measure the results. Setting of measurable performance targets is a key element in the whole management process, which enables the evaluation of a project and improves public accountability. Where publicity campaigns involve substantial government resources, both the Government and the public are entitled to know whether the money is well spent, and whether the objectives of the expenditure have been achieved.

4.3 It is generally accepted that the results of a publicity campaign are commonly measured using the following two indicators:

- ***Imparting information:*** the level of awareness of the campaign; and
- ***Influencing behaviour:*** changes in public perception/behaviour as intended by the campaign.

These two quantitative performance measurements were also used by the ISD consultant in 1998-99 to evaluate the effectiveness of government publicity campaigns (see paragraph 4.27 below).

4.4 In 1999-2000, the ISD mounted a total of ten major publicity campaigns with a total provision of \$16.5 million under the ISD recurrent publicity vote (the expenditure did not include the notional cost of airtime for APIs and the departmental staff cost involved for mounting these campaigns). These major publicity campaigns, as shown in Table 6 below, were considered to be of significant importance to the public.

Table 6

**Major publicity campaigns conducted
under the ISD recurrent publicity vote in 1999-2000**

Publicity campaign	Funding (\$ million)
Healthy Living	3.0
Fire Safety	3.0
Promotion of Services	2.0
Fight Crime	1.5
Road Safety	1.5
Anti-drug	1.5
Protection of Intellectual Property	1.0
Waste Reduction	1.0
Rehabilitation	1.0
Care for the Elderly	1.0
Total	<u>16.5</u>

Source: ISD's records

Although the total provision of these publicity campaigns was \$16.5 million, the estimated notional cost of airtime used for broadcasting the APIs of these campaigns was about ten times as much, i.e. about \$164 million (see Appendix C).

Setting of performance targets

4.5 For the publicity campaigns in Table 6 above, Audit noted that performance targets were set only for the "Healthy Living" campaign, which aimed at raising public awareness of the importance of personal and environmental hygiene by at least ten percentage points. However, no performance targets were set for the other nine major publicity campaigns to measure the level of awareness of the campaigns by the public and the changes in public perception/behaviour, as

intended by the campaigns. Thus, the ISD did not have yardsticks to measure the actual level of awareness and any changes in public perception/behaviour achieved immediately after the publicity campaigns. It was therefore not known how effective these programmes had been.

Case study — Road safety campaign

4.6 Audit selected the publicity campaigns on “Road Safety” as case study. The ISD launched a number of “Road Safety” campaigns for several years but without evaluating their effectiveness. Following an audit recommendation made in 1998 (Note 6), the ISD appointed a consultant to conduct evaluation surveys to measure the effectiveness of publicity campaigns, including the “Road Safety” campaign which was launched between August 1998 and July 1999. The main theme of the “Road Safety” campaign was on driving attitude. The campaign had four major TV APIs aimed at arousing public awareness of the undesirable outcome of:

- speeding;
- driving too close to vehicles in front;
- careless lane changing; and
- drink driving.

4.7 In August 1999, the ISD consultant reported the results of his two surveys of respondents on the level of awareness of the campaign and the changes in their social perception. The level of awareness of the campaign from the respondents (who were regular drivers) is reproduced in Table 7 below.

Note 6: *In Chapter 10 of the Director of Audit’s Report No. 30 of June 1998 on Road Safety, Audit reported that there was no formal evaluation on the effectiveness of publicity efforts on road safety. The Administration agreed to conduct formal evaluations to assess the extent to which the publicity efforts had achieved their objectives.*

Table 7

**Level of awareness of the TV APIs of regular drivers
of the Road Safety Campaign launched between August 1998 and July 1999**

API theme	Survey conducted in January 1999	Survey conducted in April 1999
	(a)	(b)
1. Speeding	71%	89%
2. Driving too close to vehicles in front	69%	91%
3. Careless lane changing	58%	69%
4. Drink driving	89%	89%
5. Any one of the above four APIs	99%	99%

Source: ISD's records

4.8 The results of the two surveys in Table 7, conducted during the campaign period, indicated that the level of awareness of the publicity campaign on road safety was increasing while the campaign was on-going. However, as there were no performance targets set at the planning stage in terms of the Government's expected level of awareness of the publicity campaign to be achieved, it is difficult to ascertain whether the campaign achieved its intended objectives, having regard to the expenditure incurred and the airtime allocated to it.

4.9 To ascertain whether the road safety campaign launched between August 1998 and July 1999 would cause any change in the attitude of regular drivers, the ISD's consultant also surveyed their opinion on careful driving in July 1998, January 1999 and April 1999. The ISD consultant asked the respondents whether speeding, driving too close to vehicles in front, careless lane changing and drink driving caused danger. A summary of the changes in perception by the respondents, as reported by the consultant's survey results, is reproduced in Table 8 below.

Table 8

**Changes in perception of regular drivers
of the causal factors of danger when driving
(for the Road Safety Campaign launched between August 1998 and July 1999)**

Question: Does the following driving behaviour cause danger	Percentage of respondents who agreed the driving behaviour caused danger		
	Survey conducted in July 1998 (a)	Survey conducted in January 1999 (b)	Survey conducted in April 1999 (c)
1. Speeding	80%	66%	73%
2. Driving too close to vehicles in front	98%	96%	95%
3. Careless lane changing	100%	99%	97%
4. Drink driving	86%	73%	79%

Source: ISD's records

It can be seen that the first survey of July 1998 (conducted one month before the launching of campaign in August 1998) found that most respondents agreed that the four bad driving behaviours would cause danger. However, the subsequent two surveys of January and April 1999 indicated that the publicity campaign did not significantly change the perception of the regular drivers as intended. In fact, the level of perception during the campaign, particularly with regard to speeding and drink driving, was lower than that prior to the campaign. **As targets had not been set before the launching of the campaign on what the Government wanted to achieve towards changing the perception or behaviour of regular drivers, it is difficult to ascertain whether the intended objectives of the campaign had been achieved.**

Other publicity campaigns

4.10 Audit found that, for some major publicity campaigns conducted in 1999-2000, the bureaux and departments concerned used a number of input indicators (e.g. number of sponsors/partners, and level of sponsored funds raised), and output indicators (e.g. number of talks

or lunches held, participants attended, visits/contacts made, and visitors to the website) to measure the performance of the campaigns. However, the two generally accepted quantitative performance indicators that are commonly used to gauge the results of a publicity campaign (i.e. the level of awareness of the campaign, and changes in public perception/behaviour as intended by the campaign — see paragraph 4.3 above) had not been used and targets had not been set for these two indicators. Examples of these publicity campaigns are listed in Table 9 below.

Table 9

**Examples of publicity campaigns conducted in 1999-2000
for which targets had not been set to gauge the level of
awareness and changes in public perception/behaviour**

Campaign	Bureau/Department	Funding provided (\$ million)	Remarks
LegCo Election 2000	Registration and Electoral Office	76.5	
District Councils Election 1999	Registration and Electoral Office	48.2	
Hong Kong Promotion in various countries	ISD	29.5	
Promotion of Information Technology	Information Technology Services Department	10.0	
Promotion of Civic Education	Home Affairs Bureau	9.8	Targets had only been set for the Community Participation Scheme
	Total	174.0	

Source: Bureaux/Departments' records

Note: These campaigns were funded under the non-recurrent publicity votes of the Bureaux/Departments concerned. The campaigns listed in Table 6 in paragraph 4.4 were funded under the recurrent publicity vote of the ISD.

Audit observations and recommendations on setting performance targets

4.11 At the planning stage of many publicity campaigns, government bureaux and departments did not use the generally accepted and commonly used performance indicators to measure the results of publicity campaigns. It is therefore difficult for the Government to monitor the level of achievement when the publicity campaigns are on-going, and to assess their effectiveness upon the completion of the campaigns. In view of the very significant financial implications (including the notional cost of airtime involved), Audit considers that it is important, at the planning stage, to set targets of publicity campaigns and to use generally accepted and commonly used performance indicators to measure the outcome.

4.12 Audit notes that the Director of Information Services acts as the adviser to the Government for public relations, including publicity campaigns (see paragraph 1.2 above). **Audit has recommended that the Director of Information Services should provide adequate guidelines to bureaux and departments. Such guidelines should enable them:**

- **to set measurable targets for the commonly used performance indicators (e.g. the level of awareness of the campaign, and changing public perception/behaviours as intended by the campaign) at the planning stage of a publicity campaign, so as to gauge the results of the campaign;**
- **to ensure that the targets are aligned with the objectives of the publicity campaign, and that the targets make a clear and positive contribution towards achieving the objectives; and**
- **to monitor the progress of the publicity campaign to assess whether its objectives have been achieved.**

Response from the Administration

4.13 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendations;
- (b) the ISD agrees that it is useful to have performance indicators such as awareness level and changes of public perception/behaviour for the purpose of evaluating the effectiveness of publicity campaigns. To achieve this, the awareness levels of the target groups of the campaign messages and public perception/behaviour with regard to campaign themes are measured by surveys before and after the campaign so that a

comparison can be made. Survey findings are also objectively interpreted and assessed to provide a basis for evaluating the effectiveness of the campaign and for planning and devising the strategies for similar publicity programmes in future. The ISD and some bureaux/departments have conducted such surveys in the past;

- (c) however, the scope for setting measurable targets for performance indicators at the planning stage of a campaign will be rather limited. Care must be taken to ensure that such benchmarks, if set, are meaningful;
- (d) the ISD will advise bureaux and departments to set performance indicators for their campaigns where appropriate and to use such indicators as the basis for evaluating the effectiveness of their publicity efforts by means of surveys. The cost implications of conducting surveys will have to be taken into account at the planning stage; and
- (e) the monitoring of progress of publicity campaigns is a subject to which the ISD attaches great importance. The ISD will continue to work closely with bureaux/departments and through steering/advisory committees, which are often widely represented, to gauge progress and ensure that the objectives of the campaigns are achieved as planned and implemented in a cost-effective manner.

4.14 The responses from the other three bureau/departments listed in Table 9 in paragraph 4.10 are set out below:

- (a) the **Chief Electoral Officer** has said that the audit recommendation on setting measurable targets for commonly used performance indicators for publicity campaigns is agreed in principle. He has also said that:
 - (i) on the level of awareness, although no assessment had been made before launching the publicity campaign, the Home Affairs Bureau did conduct a voter behaviour survey, after the conclusion of each election, to measure the level of public awareness of the election and identify the different publicity channels through which voters were made aware of the poll. The level of public awareness in the 1999 District Councils election could serve as reference for the 2000 Legislative Council election;
 - (ii) as regards the behaviour of the target group, he did have clear targets to be achieved. The number of electors expected to register was stated in the 2000-01 Estimates before the launch of publicity campaigns. The actual number of electors registered and the voter turnout rate were published immediately after the 2000 Legislative Council election and reported to the Chief Executive; and

- (iii) a number of measures had been put in place to ensure that the publicity programmes concerned were implemented as planned and in a cost-effective manner. An inter-departmental working group was set up to oversee the planning and progress of the publicity campaigns. After the conclusion of each election, the working group reviewed the effectiveness of the publicity programmes and recommended possible measures for improvement;
- (b) the **Director of Information Technology Services** has said that:
- (i) he agrees in principle with the audit observations and recommendations;
 - (ii) the general targets for promotion of information technology were increasing awareness and propensity of adoption as measured by usage behaviour and perception; and
 - (iii) in gauging the effectiveness of such promotional campaigns, the department has implemented information technology benchmarking surveys on an annual basis. These surveys provide relevant performance indicators such as personal computer and Internet penetration levels, electronic business receipts, public awareness of the Electronic Service Delivery Scheme and the use of technologies like Personal Digital Assistants, etc.; and
- (c) the **Secretary for Home Affairs** has said that he agrees with the views of the Director of Information Services expressed in paragraph 4.13 above. As regards the campaign on Promotion of Civic Education, he conducts biannual public opinion surveys, the results of which provide an objective basis to assess the changes to the public attitude towards civic responsibilities and community perception.

Pre-testing

4.15 Pre-testing of an API helps the designers check the likely reactions of the target audience to creative ideas, concepts and designs that the designers of the API propose to put into the final version of the API. In pre-testing an API, a prototype of the API is shown to a small sample of the target audience to see how they assess it, and what messages are conveyed to them. Without pre-testing, there is the risk that the API produced may not convey the appropriate messages to the target audience, and that the costs of producing it and the airtime involved in broadcasting it may be wasted.

4.16 It is desirable to pre-test the creative work at an early stage to ensure that work is proceeding along the intended lines. This is because creative staff for publicity campaigns have cultural and social background which may be different from that of the target audience.

4.17 The pre-testing procedure is not normally used by the ISD in designing and producing short films of APIs for government bureaux and departments. Audit notes that after launching the “Fight Youth Crime” TV API series launched in August 1998, the TELA recorded an exceptionally high level of complaints from the public. A total of 35 complaints were received in the following eight months about the contents of one of the TV APIs called “Mother and Daughter”. This API was intended to disseminate the message that misunderstanding between parents and children and lack of care was a crucial factor leading to youth crime. However, the complainants commented that the TV API:

- misled young people to thinking that their wrongdoings were right and their parents were wrong;
- caused discord among children and their parents;
- encouraged children to behave badly towards their parents;
- failed to tell parents how to improve communications with their children; and
- should have highlighted the importance of two-way communication between parents and children.

Some complainants reacted strongly and even asked the Government to shelve this TV API. With these adverse comments from the public, it is questionable whether the messages had been designed correctly and effectively.

4.18 Audit considers that if, for example, the storyboard and the script of the “Mother and Daughter” had been pre-tested by showing it to a small group of target audience (i.e. parents and young children) before the final production of the TV API, the producer could have made the necessary amendments at an early stage. The adverse comments from the public could have been avoided and the intended objectives of the TV API better achieved.

4.19 Audit notes that pre-testing in the form of “focus group survey” is adopted by the ICAC for the ICAC’s APIs. The survey is carried out in the form of focus group meetings. A small number of the target audience, after having seen the storyboard, are led to have a short discussion. They are invited to answer a simple questionnaire about their understanding of the story, their feelings of the message/slogan and whether they like the API. Based upon their response, the API being produced is revised taking into account the feedback of the target audience.

Audit observations and recommendations on pre-testing

4.20 Government publicity campaigns involve substantial amounts of public resources. The production of a short film of API costs about \$250,000. In addition, the broadcasting of the API on television and radio is costly in terms of the notional costs of the airtime used (see paragraph 2.7 above). Audit considers that, as a good practice, it is necessary to pre-test the production of APIs before broadcasting them on television or radio. Pre-testing helps ascertain whether the APIs will impart the intended messages to the target audience. Pre-testing also helps identify any potential serious mis-communication problems, before the bulk of the campaign expenditure is incurred. Pre-testing increases the effectiveness of a public campaign.

4.21 The Director of Information Services plays an advisory and supporting role to government bureaux and departments for publicity campaigns and production of APIs. **Audit has recommended that the Director of Information Services should:**

- **urge government bureaux and departments to adopt pre-testing procedures to test the likely reactions of the target audience of APIs before incurring significant expenditure in producing and broadcasting the APIs; and**
- **issue guidelines on how the pre-testing should be conducted, taking into account the objectives of the publicity campaigns and the measurable performance targets to assess the effectiveness of the campaign.**

Response from the Administration

4.22 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendation. Pre-testing of APIs is useful, particularly for approaches that may be controversial. However, the cost implications of conducting such surveys will need to be considered;
- (b) government APIs are usually vetted by widely represented steering/advisory committees; and
- (c) the ISD will encourage bureaux/departments to adopt pre-testing where appropriate and will advise on how such surveys should be conducted.

Evaluation of publicity campaigns

4.23 The Government conducts a number of publicity campaigns each year. Evaluation of the results, both during and after the end of a campaign, is important to assess the performance against the objectives, to improve campaign management, and to ensure value for money.

4.24 In 1988-1989, the ISD carried out an evaluation survey on the effectiveness of publicity campaigns. After a lapse of ten years, in June 1998, the ISD appointed a consultant to conduct surveys to assess the effectiveness of government publicity campaigns and to identify areas for improvement. The assessment fees for surveying the effectiveness of eight publicity campaigns (these campaigns were: Fire Safety; Anti-narcotics; Road Safety; Fight Crime; Healthy Living; Promotion of Services; Rehabilitation; and Civic Education) amounted to \$900,000.

Objectives of evaluation revised

4.25 The objectives of the evaluation exercise, according to the ISD's submission bidding for funds, were:

- (a) to give "pre", "during" and "post" campaign measurements of changes in the level of awareness, recall, perception and attitude among the target audience;
- (b) to identify other factors such as strategies contributing to the success or failure of the campaign under evaluation; and
- (c) to identify the strengths and weaknesses of government publicity efforts, to identify areas for improvement and to establish useful guidelines for future planning.

These objectives of the evaluation exercise were also stated in the consultant's tender proposal accepted by the ISD.

4.26 However, Audit noted that, in the final report submitted by the consultant, the objectives of the evaluation exercise had been changed. The revised objectives were confined to finding out:

- (a) the public awareness of these government campaigns; and
- (b) whether there were changes in public perception and behaviour as intended by the campaigns over time.

4.27 The scope of the evaluation exercise was significantly reduced. Despite this, the cost of the evaluation remained unchanged. Audit could not trace any documented agreement between the ISD and the consultant on the revision of the objectives of the evaluation.

Audit observations on evaluation of publicity campaigns

4.28 The consultant report did not identify or analyse the factors contributing to the success or failure of the campaigns, nor provided guidelines on designing effective publicity campaigns in future. It appears that the consultant did not provide all the services according to the original contract with the ISD. Hence, the original objectives of providing the funds for the evaluation were not fully met.

4.29 Audit also noted that one of the original objectives was to give “pre”, “during” and “post” campaign measurements of changes in the level of awareness, recall, perception and attitude among the target audience. According to the consultant’s proposal, to meet this objective, three rounds of survey of the selected respondents would have to be conducted. During the first round of survey, the target respondents were supposed to be interviewed before the commencement of the campaigns to provide a “pre-campaign measurement”.

4.30 The first round of the survey was conducted between 31 July 1998 and 13 August 1998 for the 24 APIs relating to the eight publicity campaigns. However, Audit noted that nine APIs (38%) had already been launched before 31 July 1998 (of which two APIs were even launched as early as 1997). Therefore, no pre-campaign measurement could be made for them. This defeated the purpose of establishing a baseline measurement for comparison with the subsequent “during campaign” and “post campaign” measurements. Without such a comparison, the effectiveness of the campaign could not be ascertained. This shows that there were deficiencies in the planning of the timing of the evaluation.

Audit recommendations on evaluation of publicity campaigns

4.31 **Audit has recommended that the Director of Information Services should:**

- **take measures to ensure that the objectives of the evaluation survey of publicity campaigns, as stated in the submission for funding, are achieved;**
- **for the evaluation survey for which a consultant was appointed in June 1998, conduct a review to ascertain why the scope of the survey had been significantly reduced; and**

- **ensure that there is proper planning for the timing of conducting evaluation surveys in future.**

Response from the Administration

4.32 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendations;
- (b) the ISD has ensured that the objectives of the evaluation survey in question were achieved. The consultants were required to evaluate and interpret the findings of the survey. Comments and observations were presented to the ISD and related to bureaux/departments in representation sessions and at subsequent meetings. The consultants were required to undertake additional work not stated in the original submission including conducting surveys and producing reports on the eight campaigns individually rather than collectively, and increasing the sample base of the survey. The scope of objectives of the survey in question has been reviewed. The ISD will step up efforts to ensure that the objectives of evaluation surveys for future publicity campaigns are achieved; and
- (c) the ISD agrees that the timing of conducting surveys is important. The experience gained from this exercise will serve as useful reference in the future.

Transfer of responsibilities

4.33 As mentioned in paragraphs 1.6 and 1.7 above, the funding arrangements for government publicity campaigns, the role and relationship between the ISD with other departments have changed. The ISD no longer takes on the responsibility of a Vote Controller for government publicity campaigns. Accountability for the expenditure now rests with the Controlling Officers concerned. The ISD plays an advisory and supporting role to the central government and departments on public relations, including publicity campaigns.

4.34 Audit considers that the ISD has an important role to play as an adviser. The ISD can render more help to departments, especially those small departments which do not have a public relations unit, in preparing the detailed campaign strategies to enable them to discharge effectively their duties of implementing the government publicity campaign.

Audit recommendations on transfer of responsibilities

4.35 **Audit has recommended that the Director of Information Services should:**

- **provide adequate guidelines (e.g. in the form of a good practice guide) to departments to assist them in managing publicity programmes. These guidelines should include:**
 - (i) **advice on the setting up of a system for managing publicity campaigns in order to achieve due economy, efficiency and effectiveness;**
 - (ii) **a requirement that, in conducting systematic reviews of campaigns during and after the campaigns to monitor progress, Controlling Officers should properly assess the results and ascertain if there is scope for improving future campaigns; and**
 - (iii) **a requirement that departments should evaluate the outcome of their publicity campaigns, and submit a post-implementation review report of publicity campaigns to the ISD and to their policy bureaux for an overall evaluation of such campaigns; and**
- **provide appropriate training to departments on the planning, organising and conducting of publicity campaigns.**

Response from the Administration

4.36 **The Director of Information Services has said that:**

- (a) **the audit recommendations are agreed. The ISD will consider developing advisory guidelines/checklist on managing and review of publicity campaigns; and**
- (b) **under the revised funding system, bureaux and departments can continue to seek assistance and advice from the ISD. To assist departments that may be organising and conducting publicity programmes on their own, useful information on campaign management will be made available to them for reference. Consideration will also be given to organising training courses on campaign management for staff of other bureaux/departments.**

PART 5: SELLING OF GOVERNMENT PUBLICATIONS

5.1 This PART examines whether there is room for improving the existing arrangements for selling government publications to the general public.

Background

5.2 As an integral part of the overall government publicity efforts, the Government produces books and pamphlets to arouse public interest in and educate the public on major issues of concern, and to create greater public awareness of civic responsibilities. Government publications are made also to help promote Hong Kong's overseas image.

5.3 The ISD is Hong Kong's biggest publisher in terms of the volume of publications it creates, edits, prints, sells and distributes on behalf of the Government. The ISD handles all saleable publications produced by the Government. In 1999, more than 6,400 titles were available for sale, and more than 1,366,800 copies were sold.

5.4 In 1999-2000, the sales of government publications amounted to \$35 million. The pricing policy of ISD publications is that the Government should recover the "full cost" of the publication. "Full cost" covers the printing and operating costs of sale and distribution (the author and design costs are excluded). If the ISD can reduce the operating costs of sale and distribution, the public can benefit from the reduced prices of the publications. Lower prices also help increase the circulation of saleable government publications.

Electronic delivery service

5.5 At present, the public can purchase government publications from the ISD's Sales Office at the Queensway Government Offices, or by post. A buyer can also download an order form from the Internet, which must be returned to the ISD by post or fax. Upon receipt of an order, the ISD calculates the cost and postage required, and sends an invoice to the buyer by post or fax.

Audit observations on electronic delivery service

5.6 Audit notes that in a number of countries, including Singapore, the purchaser can order government publications directly through an electronic service delivery system. The use of electronic services has the benefits of improving efficiency and widening the reach of public services, and reducing the cost of the publications in the longer term. As a strategy to promote Hong Kong's information structure and services so as to make Hong Kong a leading digital city in

the globally connected world of the 21st century, an Electronic Service Delivery (ESD) Scheme is available from the latter half of 2000 for the delivery of a number of public services. The first phase of the ESD Scheme services includes the payment of various types of government bills (e.g. rates and water charges), and renewal of driving and vehicle licences, etc. The ESD Scheme is available for use 24 hours a day throughout the year.

5.7 Audit notes that it is increasingly common to purchase books through the Internet. There is a need for the ISD to provide ESD Scheme for the sale of government publications as early as possible so as to take full advantage of the ESD Scheme for delivering a better service to the public.

5.8 At present, most of the government publications sold by the ISD are printed in hardcopy. Some publications are sold on compact disk form. Audit notes that, in some other countries, softcopies of government publications are also available for sale electronically. Selling publications (including government publications) in softcopy meets the aim of making the publications available to the public as widely as possible, through the much faster and usually more cost-effective medium of the Internet. Buyers and users of publications can download the softcopy at any time. Payments can be made by credit card. Audit considers that, as an alternative to selling hardcopies, the ISD should explore the feasibility of selling softcopies of government publications via the Internet at an early date.

Audit recommendations on electronic delivery service

5.9 **Audit has recommended that the Director of Information Services, in consultation with the Information Technology Services Department, should:**

- **use the ESD Scheme as soon as possible for selling government publications, as an additional service for improving the efficiency of delivery, so as to facilitate the public to access government publications; and**

- **explore the feasibility of selling government publications in softcopy form via the Internet, in addition to selling hardcopies, in order to provide a more efficient service and to achieve potential savings by way of reduction in storage space and delivery costs.**

Response from the Administration

5.10 The **Director of Information Services** has said that:

- (a) the ISD welcomes the audit recommendations. The online sale of government publications will be implemented under the ESD Scheme within 2001. The public can submit purchase orders for the government publications and settle the payment electronically via the Internet and the ESD Scheme's public information kiosks; and
- (b) the electronic sale of government publications is also covered in the ISD's Information Systems Strategic Review and the first phase of the project is scheduled to be implemented in 2001-02. The sale of softcopy of government publications via the Internet will be reviewed before commencing the second phase of the project.

5.11 The **Director of Information Technology Services** has said that electronic sale of government publications is already identified and endorsed as one of the information technology applications in the ISD's Information Systems Strategic Review which has just been completed. Online sale of government publications is one of the ESD Scheme applications to be implemented this year.

Appendix A
(paragraph 2.12 refers)

**Estimated notional cost of airtime
for TV APIs omitted by B1 Channel in a year**

Number of omitted APIs during the four weeks covered by the Audit examination	×	$\frac{52 \text{ weeks}}{4 \text{ weeks}}$	×	The weighed average rate of TV advertising airtime based on the lowest rate quoted by Licensee B for various time zones (Note)
148 APIs	×	$\frac{52 \text{ weeks}}{4 \text{ weeks}}$	×	\$8,029 for each API
			=	<u>\$15.4 million</u>
				(say \$15 million)

Source: Audit's calculation based on ISD's records

Note: Advance commitment discounts and volume rebates have been applied to arrive at a prudent estimate of the cost of airtime.

Appendix B
(paragraph 3.8 refers)

Estimated annual saving in newspaper advertising cost

Type of notice	Advertising cost during the sampling period (Note)	Possible size reduction	Estimated saving in advertising cost during the sampling period
	(a)	(b)	(c) = (a) × (b)
	(\$)	(Percentage)	(\$)
Notice of seizure of ships, Immigration Ordinance (Cap. 115)	19,200	60%	11,520
Various notice regarding bankruptcy and companies winding-up proceedings	44,200	37%	16,354
Tender notice for advertising areas of government multi-storey carpark buildings	240,800	32%	77,056
Tender notice of letting of government land	278,000	29%	80,620
			Total <u><u>185,550</u></u>
			(say \$0.19 million)

$$\begin{aligned}
 & \text{Estimated annual saving in newspaper advertising} = \text{Total newspaper advertising cost in 1999-2000} \times \frac{\text{Estimated saving in newspaper advertising cost during the sampling period}}{\text{Total newspaper advertising cost during the sampling period}} \\
 & = \$83 \text{ million} \times \frac{\$0.19 \text{ million}}{\$5.4 \text{ million}} \\
 & = \underline{\underline{\$2.9 \text{ million}}}
 \end{aligned}$$

Source: Estimated by Audit on the basis of ISD's records

Note: The sampling period refers to the one month period of April 2000 in which Audit identified possible size reduction in government advertisements published in local newspapers.

Appendix C
(paragraph 4.4 refers)

**Estimated notional cost of the airtime
devoted to the ten major publicity campaigns in 1999-2000**

Broadcasting licensee	Notional cost of the total airtime allocated for broadcasting APIs (see Table 1 in paragraph 2.7)	Proportion of the airtime of the APIs of the ten major publicity campaigns scheduled for broadcasting (Note)	Estimated notional cost of the airtime devoted to broadcasting APIs of the ten major publicity campaigns
	(a)	(b)	(c) = (a) × (b)
	(\$ million)	(Percentage)	(\$ million)
A	156	39 %	61
B	108	39 %	42
C	46	41 %	19
D	47	43 %	20
E	61	36 %	22
			Total
			<u>164</u>

Source: Audit's computation based on ISD's records

Note: The percentages were derived from the ISD's API schedules for November 1999.

Appendix D

Acronyms and abbreviations

APIs	Announcements in the Public Interest
BA	Broadcasting Authority
CSB	Civil Service Bureau
ESD Scheme	Electronic Service Delivery Scheme
ICAC	Independent Commission Against Corruption
IPRPG	Information and Public Relations Policy Group
ISD	Information Services Department
Police	Hong Kong Police Force
RTHK	Radio Television Hong Kong
TELA	Television and Entertainment Licensing Authority