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Hutchison Whampoa Limited

- 2 DEC 2005



BY FACSIMILE (FAX NO.: 2179 5982) AND BY POST

29 November 2005

Ms. Anne Chapman
Listing Division
Hong Kong Exchanges and Clearing Limited
11th Floor, One International Finance Centre
1 Harbour View Street
Central, Hong Kong

Dear Ms Chapman

Re: Exposure Paper on the Abolition of Requirement for Main Board Issuers to Publish Paid Announcements in Newspapers and Related Matters

We have the pleasure in submitting our views on the Exposure Paper concerning the captioned matter.

Q.1 Do you consider that the envisaged Listing Rule amendments clearly reflect the operational model described in this paper? If not, how could these ambiguities be clarified?

As we believe that the short-form announcement should be in the form of a notification rather than a summary announcement, we do not propose to deal with the Amendments to the Main Board Listing Rules to Implement Summary Announcements as contained in the Exposure Paper. With regards to the Amendments to Main Board Listing Rules to Implement Notifications, rather than forcing investors to review a multitude of notifications containing similar provisions as set out in the proposed Listing Rule 2.17A(4), we would recommend a format where all such notifications are grouped under one banner in the relevant English or Chinese newspaper. In particular, information to be disclosed as contained in subsections (b) to (e) of the proposed Listing Rule 2.17A(4) are of a general nature and can be set out at the beginning or the end of the notifications section of the newspaper.

The alternative approach suggested would allow investors to review all notifications issued in that particular newspaper at one glance and determine what, if any, they wish to read. In addition, this format would be more cost efficient for listed issuers, by allowing them to supply the newspaper with the name of the listed issuer, the website address and one or two sentences covering the nature of the transaction or subject matter.

Q.2 Do you consider that the short-form announcement which, as an interim measure, Main Board issuers will be required to publish in the newspapers, should be a summary announcement or a notification?

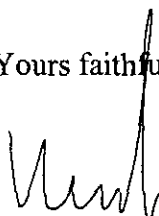
We consider that the short-form announcement should be a notification.

Q.3 Do you support the proposed implementation timetable? If not, please specify your points of disagreement and recommend an alternative implementation timetable.

We consider that a period of six months to be sufficient to prepare the market for the transition to the total abolition of paid announcements in the newspapers for the purpose of the Main Board Listing Rules.

We trust that the above is helpful.

Yours faithfully,



Edith Shih
Company Secretary
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