

- . Q1. Which of the price models discussed in consultation paper would be suitable at wholesale level in broadcasting sector and why? You may also suggest a modified/ alternate model with detailed justifications.

Answer:

I have gone through the consultation paper carefully. I have spent 52 years in the Telecom & Broadcasting Industry and still practicing as a Consultant. The Issues have been formulated intelligently and complaints gathered of the stakeholders involved, also have been analyzed transparently in the consultation paper; deserve commendation. Congrats.

I am taking the liberty to suggest two options to resolve these complex issues.

1. Complete Forbearance both in wholesale and retail model for one year. Let the market forces decide the true prices. IPTV & OTT platforms must be encouraged and then let us see which Pay channels “remain Driver” channel and which goes into obsolescence. All stakeholders will learn their lessons including Subscribers, LCO’s, DPOs, Broadcasters and it would also give time to the Regulator to gather the factual market statistics. One shall think that it may prove a bit painful for the subscriber but fact is that an Indian Subscriber pays far less than what its counterpart pays in other countries for the same content. If it wants quality let him learn how much to pay for it. TRAI should regulate the BST and be happy with it. This will take care of the BPL and other low-income group populace. Public Broadcaster must be pressurized to provide quality entertainment by opening its doors, windows and ventilators to fresh Air and fragrances coming from all directions from all over the Globe. It may be reminded of Mahatma Gandhi’s Quote which adorns the studio entrance of Broadcasting House at Sansad Marg.
2. Regulated and/ or administered Price Regime can provide relief to subscriber and plug the unethical and profiteering greed of the producers of goods and also services to some extent, but it will then always give rise to the same complex issues as highlighted in the consultation paper. I suggest the following:
  - a. Every Two Years TRAI should hold an E- Auction for a La-Carte price of a Channel registered with it by a Broadcaster both for wholesale and retail.
    - i. MSOs will bid
    - ii. Subscribers will also be asked to bid thru SMS on their Mobile
  - b. TRAI will then form its view as to what should be the price of each channel
  - c. Bouquets can then be formed by the Broadcaster and reduce the total cost as much as he would desire. TRAI should then have no objection.
  - d. It is difficult to curb non-discriminatory behavior by the Broadcasters unless the cross holding by them in the distribution

channels is not only stopped but made a punishable crime.

- e. Broadcasters RIO must be published and all Agreements between Broadcasters and MSOs, as also between MSOs and LCO's must be registered with TRAI. The Templates for T&Cs of these Agreements that should include scope of Audit by the Broadcaster, SLAs etc should be prepared and given to the parties. There should be no other agreement valid outside this agreement as far as technical & commercial deals are concerned.
3. I have refrained from answering all the questions raised in the paper for the paucity of time. I hope stakeholders shall be able to give their perspectives but unfortunately these may be influenced due to their respective business interest whereas what is needed is the healthy growth of this industry, which directly and indirectly affects the Nation in many ways and is extremely important. I pin my hopes on TRAI and the collective wisdom of the people involved in the decision-making.
4. Will look forward for an open house discussion as and when it takes place