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Dated: 1<sup>st</sup> July 2016

To,  
Advisor (B&CS) - III,  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg, Old Minto Road,  
New Delhi - 110002

Kind Attention: Shri (Prof.) M. Kasim

**Subject: Response to Consultation Paper on Issues related to Quality of Services in Digital Addressable Systems and Consumer Protection**

**Reference: TRAI Consultation paper no. 6/2016 dated 18<sup>th</sup> May 2016.**

Dear Sir

This is with reference to the above mentioned consultation paper. In this regard, please find enclosed our response for your kind consideration.

Thanking you  
Yours sincerely  
**For Bharti Telemedia Limited**

A handwritten signature in blue ink, appearing to read 'Ravi P. Gandhi', with a horizontal line underneath.

**Ravi P. Gandhi**  
**Chief Regulatory Officer**

Enclosed: As mentioned above

## **Bharti Telemedia Limited's (BTL) Response to TRAI Consultation Paper on "Issues related to Quality of Services in Digital Addressable Systems and Consumer Protection"**

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**Q 1. What should be broad contours for QoS Regulatory framework for digital addressable systems? Please furnish your comments with justification.**

**Q 2. Should there be a uniform regulatory framework for Quality of service and Consumer protection across all digital addressable Platforms? Please provide your comments with justification.**

### BTL's Response:

1. We recommend that TRAI should encourage a self-regulated QoS framework for all DTH operators under the QoS norms prescribed by TRAI. The industry has not witnessed any significant QoS related issues so far.
2. If TRAI finds that this framework is not working effectively; it can always intervene and enforce the QoS framework. However, it should be ensured that DTH operators transparently share their QoS norms on their website and compliance thereof so that the customers can take an informed decision about any DTH service.
3. TRAI has rightly acknowledged that a regulated QoS regime would require a higher degree of regulatory intervention and involvement in enforcement, auditing, etc. Thus, if TRAI decides to opt for a regulated QoS framework, then the same should be implemented for cable Industry. We believe that a regulated QoS is more critical for the cable Industry than the DTH Industry due to the large number of unorganized cable operators in the Country.
4. The DTH Industry is fully committed to follow the QoS norms of TRAI and therefore, every DTH operator is filing the compliance of these QoS norms on regular basis to TRAI. We believe that the current QoS norms are sufficient to protect the interests of the customers and we do not suggest any changes in the same. However, we welcome any initiative of a uniform QoS for all addressable systems.

**Q 3. Should timelines relating to various activities to get new connect be left to the DPOs to be transparently declared to the subscribers? If so, how the interest of the subscriber can be protected if the connection is not provided in given time frame?**

BTL's Response:

1. We recommend that the timelines related to provision of a new connection should be left to be decided by DTH operators. For obtaining a new connection, a customer can approach any DTH operator through a call centre, dealer, website, apps, etc. In a competitive market, it is always in the business interest of the DTH operators to provide any new connection in expeditious manner.
2. However, if TRAI still feels otherwise, then we believe that the current timelines as prescribed for DTH operators for a new connection is sufficient in present market scenario.

**Q 4. What should be the time limits for various activities, as mentioned below, to get new connection? Please provide your comments with justification.**

**(a) Response time for processing new service request and conveying feasibility of providing connection at the desired location**

**(b) Time line for completion of CAF, installation and activation of service**

BTL's Response:

1. We believe that 24 hours is sufficient for checking the feasibility of providing a new connection at the desired location and another 24 hours (total 48 hours) is adequate for installation and activation of a new connection.
2. However, this time period should exempt those scenarios when a customer requests the authorized representative of a DTH operator to come on a specific date and time as in such cases, the time limit can go beyond the 48-hour prescribed time limit.

**Q 5. Should minimum essential information to be included in the CAF be mandated through regulations to maintain basic uniformity? Give your suggestions with justification.**

**Q 6. Should minimum font size need to be specified for CAF? If not, how can it be ensured that important information provided in CAF is given in such a manner that consumer can read them easily?**

**Q 7. Should use of e-CAF be facilitated, encouraged or mandated? Please provide your comments with justification.**

BTL's Response:

1. We strongly recommend that the requirement of CAF should be re-examined. While the obligation of CAF is critical for telecom sector to meet the national security requirements, however, no such concern exists for customers using TV services. TV services are essentially needed to fulfill the entertainment and knowledge enhancing needs of the customer and can be clubbed in the same category as consumer durable products/services which are sold across the nation without any CAF requirement. There is no real concern on the misuse of TV services in any manner, as the communication via TV services is one way and not two way unlike in mobile services. Further, the content belongs to broadcasters and not a user specific content. This is also evident from the fact that millions of Indians still watch Doordarshan Digital Terrestrial Television with the help of rooftop antennas.
2. CAF has no relationship with payouts to broadcasters; as such the payouts are completely dependent on SMS and CAS of DPOs, which are also audited by broadcasters. CAF has no relationship or relevance with quality of service.
3. DTH is entirely a pre-paid platform and there is no risk of incurring bad debts. While cable operators do not work on pre-paid model, but they usually provide their services after taking the monthly usage charges in advance. Thus, there is no case of bad debts and even such a case exists, then such concerns are commercial rather than regulatory.
4. We recommend that the obligation of CAF should be taken away as it levies huge cost burden on all DTH operators without serving the required purpose. It should be left open for the DTH operators to decide how and what information they want to collect from and store for their customers (for example, the Aadhaar Card Number).

**Q 8. Should the minimum essential information to be included in the MoP be mandated through regulations to maintain basic uniformity and to ensure that consumers get all relevant information about the services being subscribed?**

**Q 9. What should be the minimum information to be included in MOP Give details with justification?**

**Q 10. Should it be necessary to provide printed copy of MOP to all the customers at the time of subscription to the service? If not, how it can be ensured that all required information is available to subscribers when required?**

BTL's Response:

1. We believe that the best medium for providing all essential information to customers is over the TV screen. For example, we provide a 'help button' on our remote, which guides all our customers on how they can access the information related to:
  - a. their packages and account balance;
  - b. other packs and Top Ups
  - c. recharge values
  - d. value added services
  - e. contact details of our 24x7 customer care centers across India,
  - f. e-mail ID,
  - g. information related to troubleshooting,
  - h. List of charges such as service visit charges, STB and VC replacement charges, other CPE parts, extra cable charges in new installation, relocation charges, etc.
2. It is more economical and effective to provide all essential information over the TV screen which is available 24x7 rather than providing a printed manual of practice (MoP), as majority of customers will never read or refer the same. Thus, we recommend that DTH operators should not be forced to provide a printed MoP and consumer charter as long as all essential information is given over the TV screen or customers are being informed how they can access such information.
3. We believe that the information as prescribed in existing MoP and consumer charter is sufficient for consumers. Thus, we do not suggest any changes in the same.

**Q 11. Should there be an initial subscription period while providing a new connection to protect the interest of both the subscriber as well as DPOs?**

**Q 12. If so, what should be the duration of such initial subscription period?**

**Q 13. What protections should be provided to subscribers and DPOs during initial subscription period? Give details with justification?**

BTL's Response:

1. To attract new customers, DTH operators offer affordable packages with low entry barriers. Such schemes are designed by DTH operators with an assumption that the subscriber will continue to subscribe to services for a certain minimum period. Thus, such initial packs are only viable as long as the customer uses the service for the entire initial subscription period.

2. However, many new customers do not recharge their packs during the interim period (say first month they will recharge and in the second month they do not recharge and third month they recharge again). Since, DTH operators incur costs towards laying down the necessary infrastructure for providing a new connection at consumer premise, this causes a huge revenue loss to DTH operators.
3. We believe that a period of 3 months should be considered as an 'initial subscription period' under which the customer gets the service with the same terms and conditions for which he has subscribed the services. However, it should also be mandated that the customer commits the minimum revenue for these 3 months continuously / upfront. In case, there is a dormant period of more than 7 days, then the DTH operator should be allowed to change the terms and conditions of initial subscription period. Such a regime will protect the interest of both the subscriber as well as DTH operators.

**Q 14. What should be the framework for compensation to the subscriber for dropping of a channel due to its non-availability on the DPOs' platform?**

**Q 15. How should the reduction in subscription charges be calculated in case of discontinuation of channel from DPOs platform? Please provide your comments along with justification.**

BTL's Response:

1. Broadcasting sector is a two way market where a DPO procures the TV channel from a broadcaster and offers the same to their customers. A DPO is totally dependent on the broadcaster for the continuity of its business. Hence, the non-availability of any channel on DTH platform could be due to various reasons and most of times, beyond their control.
2. To protect the consumer interests, DPO provides an alternate channel to its customers if any channel is dropped from its platform due to any reason. Presently, DPOs offer package to their customers containing hundreds of channels wherein the cost of each channel is not fixed.
3. It is difficult to determine the price of a dropped channel from a bouquet/ pack for the purpose of compensation. Furthermore, it would be an operational nightmare to meet the request of each customer as some customers would prefer alternate channel and some may prefer compensation. To do the same, the DTH operator would be forced to take the consent of each and every customer using the affected bouquet/ pack and

such individual requests would have to be configured in the system. This will not only increase the number of bouquets/packs significantly (with/without alternate channel) but will also put stress on existing IT systems.

4. Therefore, there should not be any obligation for compensation in the case of a dropped channel as long as an alternate channel is being provided by a DTH operator to its affected customers. The customer can be informed by way of a Broadcast mail, Scrolls, Home Channel etc. In fact, DTH operator should not be forced to replace the channel immediately if less than 1-2% of total channels are dropped. For example, if one channel is dropped out of a bouquet of 100 channels, then DTH operator should have adequate time to replace that channel instead on immediate basis.
5. Any compensation should only be considered, if more than 10% of the total channels are dropped.

**Q 16. What should the maximum permissible time of disruption beyond which subscriber must be compensated in following cases?**

- (a) Disruption due to technical fault on the DPO network or at the subscriber's end**
- (b) Disruption due to technical fault of CPE at the subscriber's end**

**Q 17. What should be the duration of disruption in service warranting compensation to the consumer and how the compensation should be calculated in following cases?**

- (a) Continued Disruption due to technical fault on the DPO network at the subscriber's end beyond the pre specified time.**
- (b) Continued Disruption due to technical fault of CPE at the subscriber's end beyond the pre specified time.**

BTL's Response:

1. As per the existing norms, we are addressing more than 90% of the complaints related to 'No Signal' within 24 hours from the receipt of a complaint.
2. For remaining percentage (10%), we believe that 5 working days should be the maximum permissible time for resolving the complaint of a customer. In case of non-redressal of complaints within the specified time period, pro-rata rebate can be given to customer for the period of non-redressal counted from the date of expiry of 5 working days. For example, if a DPO is unable to resolve the complaint of any

subscriber within 7 working days, then the customer should be compensated to an extent of 2 working days.

**Q 18. What should be the framework and terms and conditions for shifting of connection including timelines in respect of PAN India DPOs where provision of connection at new location is feasible?**

**Q 19. Is there a need to prescribe procedure for transfer of the TV connection? If so, what should the procedure, terms and conditions for transfer of services connection and timelines?**

BTL's Response:

1. As stated earlier, we do not recommend the collection of a CAF either for a new connection or for shifting of any existing connection. It should be left to the DPOs to decide on how and what information they want to collect and store about their customers.
2. All requests for relocation of DTH service should be met (subject to technical feasibility and customer availability), not exceeding five working days from the date of making such request.

**Q 20. What should be the framework to address the concerns of stakeholders (Subscribers and DPOs) relating to temporary suspension of service?**

BTL's Response:

1. In DTH Industry, the temporary suspension of service as well as inactive subscriber (to the extent of 34 per cent) is a significant issue. While these customers do not add any revenue to DTH operators; however, DTH operators incur a fixed cost for maintaining such customer base. Further, the deactivation and re-activation of service involves an effort as well as cost on the part of DTH operators.
2. Thus, we believe that DTH operators should be allowed to levy a minimum charge during the suspension of a TV services at customer end as any suspension for a longer period and at frequent intervals adversely affects the revenue estimation of DTH operators as well as their ability to continue with affordable tariffs. It cannot be a case that the DTH operators are made liable for any compensation to their customers and on the other hand, there is no obligation on customer's side not to pay a nominal fee



during the suspension period. It is to be noted that in telecom sector, TRAI has prescribed Rs.150 for three months for keeping a post-paid connection under 'safe custody'.

**Q 21. How issue of abrupt closure of service due to non-payment can be addressed while protecting the interest of subscribers and DPOs?**

**Q 22. Is gradual closure of service as discussed in para 8.23 is a feasible option? If so what should be procedure and the framework?**

BTL's Response:

1. As stated above, DTH is a pre-paid platform where the customer is required to put the money in a pre-paid wallet for uninterrupted service. The customer is reminded by way of SMS and pop-up message over TV screen for the recharge at least 3-4 days in advance on daily basis to ensure uninterrupted service. Further, any DTH customer can recharge their wallet through various means such as online, using other pre-paid wallets, apps, distributor and most of these services are available 24x7. So, if a customer still chooses to ignore the reminders to do recharge on time, then the DTH operator has no option but to stop the TV services. Thus, any stoppage of service by a DTH operator is not a sudden closure of services in any manner.
2. We strongly oppose the suggestion of gradual closure of service once the customer is given sufficient opportunities to recharge its wallet for uninterrupted services. During the suspension period, a DTH operator should not be forced to offer FTA channels as the operational cost for carrying any FTA or pay channel is the same. The DTH operators will have to incur a huge cost for carrying FTA channels without any assurance of payment, causing huge revenue loss to the operators.

**Q 23. What should the procedure and timeframe to inform the subscriber regarding closure of service due to closure of business?**

BTL's Response:

A notice period of 30 days to customers over TV screen and through other means is sufficient to inform the subscriber regarding the closure of service due to closure of business.

**Q 24. Why uptake of mandated schemes for set top box (Outright purchase, Hire purchase, and on rent) is so low at present? How consumer awareness on these issues can be increased?**

**Q 25. What should be the consumer friendly common framework of CPE Schemes for providing CPE to consumers in digital addressable system? Please provide your comments with justification?**

**Q 26. What should be minimum essential information related to a CPE scheme that must be made available to the consumers to safeguard their interests? Please provide your comments with justification.**

BTL's Response:

1. Currently, the customers can obtain CPE under hire-purchase, outright purchase and rental scheme. However, due to prevailing competitive forces, operators offer additional schemes, where they charge for the activation of services and bundled channels. The latter scheme has generally proven itself to be the most competitive and affordable for consumers, as indicated by the large number of subscribers who opted for such packages. Therefore, if the consumers have not chosen other schemes, then it is due to lack of interest at customer's end.
2. We believe that the current system is quite fair, transparent and competitive and the same does not require any regulatory intervention.

**Q 27. What measures may be adopted to ensure availability of good quality CPE to consumers?**

BTL's Response:

1. DTH operators' differentiated features and competitive edge lies in the features of the STB. Service delivery and product differentiation capability are inbuilt in the STB which drives value proposition for the end customer. The DTH operators offer exclusive contents/value added services like CLM & Red bug, EPG, Interactive applications, games, add insertion to their customers. Industry adapts fast moving changes in technology with respect to new chipset and compression standards like MPEG2, MPEG4, HEVC, 4K, etc. For example, the new compression standards of HEVC have been adopted by some operators to improve efficiencies.
2. Therefore, we believe that DTH operators are taking all efforts to provide a good quality set top box to ensure a seamless and quality service.

**Q 28. Should any charges such as visit charges, etc. be charged from the subscribers during guarantee-warranty period?**

**Q 29. What should be provisions for maintenance of CPE after the expiry of guarantee-warranty period?**

BTL's Response:

Our company provides a comprehensive maintenance cover of all the customer premise equipment (inclusive of visit charges) from the date of activation of new connection, initially free for one year and thereafter at nominal fee on annual basis, if the customer desires.

**Q 30. What should be the simplified provisions for surrender of CPE in case of closure of service by the subscribers in order to protect their interest?**

BTL's Response:

1. Presently, majority of customers of DTH operators have subscribed to those plans/packs wherein the DTH operator retains the ownership of CPE and merely charges for the activation of services and bundled channels.
2. Therefore, in such schemes, a DTH operator is not required to pay any money to the customer if it decides to surrender the CPE to the service provider.

**Q 31. Please suggest the standards and essential technical parameters for ensuring good quality of service for the following digital addressable platforms:**

- e). Digital Cable TV
- f). DTH
- g). HITS
- h). IPTV

**Q 32. What are the different methods to effectively increase consumer awareness?**

BTL's Response:

We believe that ICT can play a significant role in enhancing the consumer awareness about the consumer centric information. DTH operators are currently using various

platforms such as website, apps, information on TV screen, etc for this purpose. We are making all efforts to educate our customers and would be happy to receive any suggestion to improve our customer services.

**Q 33. How consumer related information can be effectively provided to Subscribers through DPO website. What minimum information should be provided through consumer corner?**

BTL's Response:

1. All DTH operators have invested significantly in designing their website so that the customer is able to obtain the requisite information in a user friendly manner. All information related to DTH services (both for existing and new customers) are given in a transparent and user friendly manner.
2. From time to time, DTH operators conduct the market survey about the effectiveness of their websites and other consumer centric platforms and improve their services based on customers' feedback and suggestions. Needless to say, we are happy to accept any suggestion to provide a better experience to our customers.

**Q 34. Can outsourcing to the third party for various web based operations be permitted especially for smaller DPOs? If yes, what precautions are taken to ensure that such provisions are not misused?**

BTL's Response:

We believe that the decision to manage the web based operations (in-house or outsource) should be left to DTH operators based on their business model and operational requirements.

**Q 35. In case of the use of "In Channel" communication means, what should the guidelines for running scrolls or other onscreen displays, so that it does not impact the viewing experience?**

BTL's Response:

1. Currently, all DTH operators are ensuring that they use this communication channel without adversely affecting the viewing experience of their customers. If they do so, then it will lead to customer dissatisfaction and then they would not like to do so.
2. Therefore, we do not recommend any particular guideline over this issue.

**Q 36. What options can be used for verifiability of subscriber communications for any change in service or provision of additional service?**

BTL's Response:

1. As per the current norms, any new service (such as add-on packs, any channel) is activated only after taking an explicit request and consent from the customers. The registered mobile number is used for obtaining such confirmation from a subscriber and the customer is asked to share the customer ID or its other details as recorded in the system.
2. Therefore, all DTH operators should ensure the verifiability of subscriber communications before any change in service or provision of additional service.

**Q 37. What should be the duration to preserve such verifiable subscriber communications requesting change in service or provision of additional services at DPO level?**

BTL's Response:

We believe that it should be left to the DTH operators to decide on the preservation of such records.

**Q 38. What should be optimal number of channel packages which meets the subscriber demand and are well understood by the subscribers?**

BTL's Response:

The DTH operator should be allowed to offer as many packages as possible to cater to the needs of different segments.

**Q 39. How the package offerings can be improved in case of cable TV services so that effective choice is made available to the consumers?**

BTL's Response:

No comments

**Q 40. Whether the choice of Pre or Post paid method should be mandatorily made available to the subscribers?**

**Q 41. What should be the essential information contained in the monthly Bill/ Usage details to be provided to subscribers in post paid or pre-paid system?**

**Q 42. Should pre-paid method is encouraged in case of cable TV services provided through LCOs? Support your comments with justification.**

**Q 43. What should be the billing cycle both for pre-paid and post paid? Please give your comments along with justification.**

BTL's Response:

1. The DTH platform is entirely a pre-paid platform and has been running successfully for the last 15 years. The customers have various ways and means to recharge their DTH wallet, through 24x7 customer care, website, apps, distributors/retailers, company premises, etc. While the cable operators do not work on pre-paid model, but they generally provide their services on advance basis wherein a monthly usage charge is taken from subscribers in advance rather than following a post-paid method wherein the usage first occurs and then the money is collected at a later stage. So, we believe that the entire distribution platform of TV series is essentially working on a pre-paid model rather than on post-paid.
2. Since, there is no threat of any bad debts in pre-paid model, we strongly recommend that it should be left to DPOs to decide their business models.

**Q 44. Should deduction of maintenance related charges for CPE from the pre paid subscription account be prohibited?**

BTL's Response:

No. We do not foresee any issue in the deduction, if the same is being done with the explicit consent of the consumer.

**Q 45. How Toll Free number and call centre details can be widely publicised among the subscriber?**

BTL's Response:

1. Currently, all DTH operators are widely publishing their toll free number and call centre details through various means such as CAF, website, b-mail, distributor/retail points, apps etc. They are using all means to maximize their reach for which the toll free number and call centre details play a critical role.
2. Therefore, we believe that the existing steps being taken by the DTH operators are adequate. However, we are happy to follow any other mechanism, which is user friendly and cost effective.

**Q 46. How response time and accessibility of call centre including that of the Call centre executive can be enhanced?**

BTL's Response:

1. At the outset, we would like to respectfully submit that the call-centre facility is an external activity with definite significant cost elements like facility set-up cost, agent cost and operations maintenance cost etc. We believe that it would be an unfair to mandate toll-free call-centre accessibility by DTH operators. The DTH operator pays call centre related cost including the cost of telecom resources involved in provisioning of services. In DTH industry, call-centre accessibility cost is higher vis-à-vis telecom industry, as cost of telecom resources are being absorbed by TSPs, whereas these would be chargeable cost heads in our case. In competitive industry like DTH, it would be best suited that charging or no-charging of call-centre accessibility decision is completely left to DTH operators. Therefore, we request you not to mandate toll-free charging of call-centre accessibility and leave this decision to DTH operators for serving their customers in the best possible manner.
2. In case, the Authority deems it necessary to mandate call-centre accessibility as toll-free, then it is suggested to follow the model adopted in Telecom industry wherein, complaint number is toll-free and general inquiry number is chargeable to the extent of recovery of cost elements involved in offering call-centre services.

3. As per the existing rules, DTH operators are required to ensure that the IVR response should be such that eighty percent of calls are answered within twenty seconds and ninety five percent of calls are to be answered within forty seconds. For voice-to-voice calls, eighty percent of calls shall be answered within sixty seconds and ninety five per cent of calls are to be answered within ninety seconds.
4. We believe that the existing rules are quite effective and strict. Any further stringent rule for response time will merely increase the cost of call centres without serving any meaningful purpose.

**Q 47. Please provide your comments on the following performance parameters discussed in preceding paras related to call centre?**

- a. Call centre availability hours**
- b. Multiple languages in IVR**
- c. Response time for answering IVR and voice to voice calls**
- d. Sub menu and accessibility of customer care executive**

**Q 48. What should be the timelines for complaint resolution for different type of complaints at call centre and Nodal officer level?**

BTL's Response:

1. Our call centre is operational 24x7 so the customers can approach us at any point of time.
2. We are already providing services in multiple languages (English, Hindi, Punjab, Gujarati, Marathi, Bengali, Assamese, Oriya, Tamil, Telugu, Kannada, Malayalam)
3. In our system, IVR Response are made for 80% calls within 20 seconds, 95% calls are answered within 40 seconds. For Voice to Voice, 80% calls to be answered in 60 seconds and 95% calls within 90 seconds.
4. Our accessibility to Customer care executive is at maximum 2<sup>nd</sup> Leg.

**Q 49. Can outsourcing of call centre and web based complaint monitoring functions to third party help in increasing efficiency and compliance levels?**



BTL's Response:

It should be left to DPOs whether they want to handle such activities in-house or outsource to any third party. Since this is an operational matter, any regulatory intervention is not required at such a micro level.

**Q 50. What should be the innovative ways to develop a speedy user friendly complaint registering and redressal framework using Mobile Apps, SMS, Online system etc.**

BTL's Response:

DTH operators are using all technologies and means for registering the complaints.

**Q 51. What should be framework for implementation of electronic PMR?**

BTL's Response:

We support any initiative of digitalization of PMR formats and online submission of various reports to TRAI. TRAI is already collecting various reports online for telecom sector which is quite user friendly and we request that the same may be extended to broadcasting sector as well.

**Q 52. What should be framework for auditing of the records for QoS regulatory compliance by DPOs? Please suggest appropriate measures along with justifications.**

BTL's Response:

1. As stated above, we support the self-regulation for QoS as the DTH Industry has not witnessed any significant QoS related complaint which necessitates the requirement of QoS audit.
2. Initially, we suggest that all DPOs should be required to publish their QoS standards and compliance thereof, duly audited by their Auditors. Alternatively, TRAI may suggest a panel of auditors for DPOs.

**Q 53. What should be framework for carrying out survey for QoS compliance and subscriber satisfaction?**

BTL's Response:

We support any initiative of periodic surveys for determining the subscriber satisfaction towards their DPOs. Such initiatives will certainly enable all stakeholders to provide best services to their customers.

**Q 54. What should be the framework and quantum for financial disincentives for non compliance to the prescribed QoS benchmarks? Please suggest appropriate measures along with justifications.**

BTL's Response:

1. We strongly feel that the DPOs should not be subjected to any financial disincentives for non-compliance to the prescribed QoS benchmarks. The DTH Industry is quite competitive and is offering innovative and affordable services to its customers.
2. Therefore, imposing any financial disincentives for non-compliance of any self-regulated QoS norms or any other QoS norms is unwarranted and should be avoided.

**Q 55. Should all channels carried on the platform of a DPO must be included and shown in the EPG? Justify your comments.**

BTL's Response:

We are already showing all channels being carried on our platform on EPG.

**Q 56. Stakeholders may also provide their comments on any other issue relevant to the present consultation.**

BTL's Response:

No comments