

CABLE OPERATORS SANGRAM ASSOCIATION

(REGISTERED UNDER THE WEST BENGAL SOCIETIES ACT. 1961)

13/1, LAKE GARDENS KOLKATA 700 045

E-mail:sangramcommittee1@gmail.com

Date 24/10/2016

To,

The Chairman

TELECOM REGULATORY AUTHORITY OF INDIA

Government of India

Mahanagar Doorsanchar Bhawan, Jawahar Lal Nehru Marg.

New Delhi – 110 011

Respected Sir,

Sub: - Comments on Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016.

At very inception, we the Association of Cable TV Operators of West Bengal take this opportunity to congratulate you to allow us with the chances to place observation from the end of LCOs on the various issues of draft Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016.

Before register our comments on the draft Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016, there is a feeling that the architecture of today's Cable TV Industry Local Cable Operators (LCO) will soon witness sufficiently with the episode of losing their income and business built up by them over a period of 27 years. The reasons behind our apprehensions are the huge reduce of percentage of present revenue as well as

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the current Indian inflation rate. Moreover, although the streaming is the future of television as and when the smart television experience slowly introducing in India including a booming shifts toward cord cutting, smart TVs and streaming services.

During the last three years after inception of Digitization in the Phase I & II ,when it was require to allow preparatory period to the Local Cable Operators to take initiatives to upgrade technically, their network based on IP to take advantage on high bandwidth and the incoming advancement of OTT then they were busy to struggle against the unlawful activities, highhanded attitude and arm-twisting of MSOs. Most of the time the Local Cable Operators were busy to hunt needs of consideration of the appropriate authorities to survive.

We believe that the implementation of this draft regulation will bring in path-breaking changes to the industry structure with a lot of transparency and non-discrimination. The Telecom Regulatory Authority of India's (TRAI) present proposal for the broadcasting and cable services tariff is a step in the right direction, but we feel some issues still need to be clarified.

However, the TRAI has introduced the new category called a premium channel. Broadcasters are free to notify any channel as premium channel in their reference interconnect order (RIO). , as the premium channel will not form a part of any bouquet in the entire value chain and can only be subscribed by paying separately, according to the order There is no price cap on maximum retail price on the premium channel for customers. A premium channel will allow the broadcasters to offer specialized channels at higher MRPs as broadcaster desires.

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On the other hand, the decision of geographically rate fixing of Channels will lead the Industry in the label of discrimination specifically when the Authority is trying to minimize the uncertainty following the transparency of pricing in the Cable TV Industry.

More so ever the issue of pricing of High Definition (HD) Channels i.e. thrice of Standard Definition (SD) Channels also has no justification even when the content of the HD Channels will be as same as SD Channels along with the commercial break.

No endeavor of TRAI has been reflected to the present draft Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016 regarding the Never-ending commercial breaks on television channels, even after issued regulation of TRAI on March 22, 2013, notified a revised regulation called Standards of Quality of Service (Duration of Advertisements in Television Channels) (Amendment) Regulations, 2013. We hope this issue will be highlighted in the next time not only to minimize the irritation of the Consumers to enjoy the content of TV Channels but also to save the hard earn money of Consumers specially when he is subscribing for the content of the Pay Channels not for the Advertisement.

Furthermore, India is the second largest market of smart phone and the growing number of smart TV evidently elucidate the trends of consumer today wants complete control over their entertainment and content consumption. In view of the above contention, the present Tariff recommendation of TRAI will help the consumers to accommodate with the Digitization.

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Then again, the scopes of revenue of LCOs neither had been settled since Digitization nor been declared in the present Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016. Along with the proposed freedom of choice of Consumers, we request the authority as well as seeking to protect the livelihood of thousands of Local Cable TV Operators since 1990 and responsible for creating this million dollars industry in country.

Sir we hope LCOs will get act of kindness with the kind conclusion on the Issues on proper revenue considering the current Indian inflation rate especially where the question of bread and butter related. Otherwise, thousands of Local Cable TV Operators along with their member of staff would lead to unemployment.

Without prejudice to our rights and contentions to the Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016 of TRAI, we are going to raise the issues need consideration of the appropriate authorities.

Thanking You

Yours faithfully

Mrs. Ajanta Bhattacharyya

Secretary

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