

# **CABLE & BROADBAND OPERATORS WELFARE ASSOCIATION**

**Regd. Office: 2A, kartick Bose Lane, Kolkata-700 006**

**Registered under West Bengal Society Act**

**03 September, 2013**

**To:**

**Mr. Wasi Ahmad,  
Advisor (B&CS), Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg,  
New Delhi – 110002.**

Dear Sir,

**Sub: Consultation Paper on Distribution of TV Channels from Broadcasters to Platform Operators.**

We thankfully acknowledge your attempt to restrict the broadcasting sector which are the sources of market distortion now-a-days. The high handedness of broadcasting sector through their distribution platform have created absolute monopoly in the market resulting Panic and insecurity among the cable operators and the MSOs as well.

The broadcasters in the name of aggregators donot give any options to the cable operators and the MSOs for any negotiation but to accept their terms of business which are contrary to the interest of consumers, cable operators and the MSOs all together.

Hence, we would like put forward a few important issue which may be considered while formulating the final recommendation.

- Distribution platform/Aggregator should not be allowed to act as an agent of multiple broadcaster. Restrict the role of Aggregator/Distributor to single broadcaster and they shall not be allowed to deal with multiple broadcasters or represent the interest of multiple broadcasters.
- Broadcasters should not have any stake in any Distribution and/or aggregator platform in any form whatsoever in order to restrict the influence of the broadcasters in the RIO and their forceful act to accept packages.
- No broadcasters shall claim ownership of any other channel/Broadcasting platform having bare minimum stake, in other words, broadcasters having minimum stake of 74%-percent only of any channel shall be entitled to include the channel onto its own bouquet.

- Three months time, which is proposed for reworking Interconnect Offers (RIOs) , entering into interconnect agreements and filing the same with the Authority, is not become feasible for many reasons, majority of which pop up from broadcasters end. It is, therefore, requested to review the fact and allow/extend such date for a minimum period of 6-months. Usually, broadcasters intentionally delayed such agreement period with an intention to put pressure after the deadline according to their whims and fancy.
- Broadcasters use their channels as NOTICE BOARD for payment while in disputes with cable operators/ MSOs but donot use their platform as a tools for consumers awareness about the status of their channels whether PAY/FREE TO AIR channel or the cost of such channels. TRAI should mandate that all the broadcasters shall have to announce the status through their respective channel(s)
- An upper ceiling limit/ MRP for each channel and/or bouquet to be fixed by the Regulator (TRAI) as in the case of CAS-system, where the rate was affixed by the Regulator which has given the consumer a fair chance to choose/select than to depend on the whims and fancy of the broadcasters who bundle the channel on their own vested interest at a sky high cost.
- The MRP Price of the pay channels has to be published on the website of the broadcaster and on the print media as well for general information and public interest in periodical basis and during the revision of price. It is important for the public interest that the broadcasters, who actually sell the channel as product and do all the marketing activity without announcing the cost of the same.
- A '**fixed revenue sharing model**' is required to be prescribed for the cable Operator(s) to end the tussle among the stake holders. A fixed percentage of share of the a-la-carte price paid by the end-subscriber/consumer is also required to make the ship floating as the last mile cable operators is doing the important role of the system to generate the revenue for the whole chain system. If last mile operators donot able to play their role properly in executing the service to the consumers household, the system will not be able to work properly and on the contrary, the livelihood of million of people will become at stake.

We sincerely thank you for your endeavours in protecting the Consumers interest and to free them from this ongoing exploitation and unnecessary financial burdens and shall urge you to protect the employment and livelihood of millions of young

youth who are totally depended, along with their family, on the cable TV distribution system.

Thanking you.

Sincerely yours,

**For CABLE & BROADBAND OPERATORS WELFARE ASSOCIATION**

*s/d- Swapn Chowdhury.*

**SWAPAN CHOWDHURY**

General Secretary

9836080592