



Digital Cable & Broadband Operators Association

Dated: 09.10.2023

To:

**Sri Anil Kumar Bhardwaj, Advisor(B&CS)
The Telecom Regulatory Authority of India
Mahanagar Doordarshan Bhawan
Jawaharlal Nehru Marg
New Delhi-110 002**

Sir,

**Sub: Consultation Paper On Review Of Regulatory Framework For
Broadcasting and Cable Services (ConsultationPaperNo.13/2023)**

We, Digital Cable & Broadband Operators Association(**DCBOA**), on behalf of Cable Operators of West Bengal, express our sincere gratitude and appreciation to TRAI for taking cognizance of some of the Key Issues and challenges that we have been encountering in our business since the inception of DAS. We are grateful of TRAI's initiative in raising some key issues that cable operators were longed requesting for an appropriate revision and incorporation.

DCBOA on behalf of more than 50-thousand LCO/LMOs of West Bengal are seeking a level playing field and a fair and equitable revenue share from the different sources of revenue generated in this business. However, we state our views on the issues herein below.

At the same time we request TRAI to also consider and lend credence to the views of our members, who will also reply with their own set of comments, individually or as different smaller group of LCO/LMOs, some of which may be in variance with the views expressed here.

Q1. Should the present ceiling of Rs.130/- on NCF be reviewed and revised?

DCBOA RESPONSE:

Our view is that the current NCF of Rs. 130/- + GST should be retained and should not be revised, as this price was arrived after due deliberations and seems to be a fair rate.

NCF is an important component of subscription revenue that recognizes the cost of infrastructure and its maintenance and offers a fair compensation to the distribution entities (LCO/LMO and the DPOs). NCF, in different forms have been proposed in the previous avatar of Digitalization (CAS) as also in the previous regulations recommended under DAS. Just to place on record, in the Digitalized CAS regime and in the initial DAS regime, the NCF was entirely assigned to the LCO/LMO account.

However, our major concern regarding NCF is the non-conformance / non-compliance of Free Dish, which has been given an unfair free-run to telecast not just the free channels but also pay channels and ***not collect any revenues, including NCF and GST from customers***, giving it an unfair and disproportionate advantage. We have provided a more detailed note on our opinion on NCF later in this reply.

Q3. Whether DPOs should be allowed to have variable NCF for different bouquets/plans for and within a state/City/Town/Village? If yes, should there be some defined parameters for such variable NCF? Please provide detailed reasons/justifications. Will there be an NCF? Please provide detailed reasons/justification. Will there be any adverse impact on any stakeholder, if variable NCF is considered?

DCBOA RESPONSE

We, DCBOA, will urge of a set of standard NCF rates should be prescribed for different classification of locations such as Metro cities, Urban Cities, Towns and Villages or Rural areas.

Suggesting differential rates of NCF is very tricky as the cost of delivery of services is higher in villages and smaller cities and is relatively lower in the bigger cities and towns. NCF therefore ideally should be higher in villages and smaller towns but considering the lower paying capacities of consumers in the villages and smaller towns, we propose lower NCF for them, so that the burden on those consumers is less.

DCBOA advocates a significantly higher share of NCF (75%), to be assigned to the LCO/LMO as the quantum of outdoor infrastructure is significantly higher for the LCO/LMO compared to the MSOs.

However, our biggest concern, especially in the villages and smaller towns is Free Dish which is being allowed to offer FTA channels, services of Private Broadcasters and shockingly even Pay channels without collecting any NCF in blatant violation of DAS regulations, which we strongly recommend, should cease immediately.

To place on record, the truth is that the single biggest contributor to the erosion of Cable TV subscribers is because of Free Dish offering Pay and FTA channels of private broadcasters, without charging any subscription whatsoever (including non-collection of GST). Without doubt this illegal act by the broadcaster is the key reason for wiping out the business and livelihood of at least 20 to 25% LCO/LMOs and putting the business of another 50% LCO/LMOs into peril. Most of the LCO/LMOs, especially from Rural India and Mofussil towns who have been operating their business in extremely adverse conditions have lost their business and finances which they invested in creating the wired distribution infrastructure because of the wilful law breaker, Free Dish.

Q4. Should TRAI revise the current provision that NCF for 2nd TV connection and onwards in multi-TV homes should not be more than 40% of declared NCF per additional TV?

DCBOA RESPONSE

We are OK with the 40% discount on declared NCF for 2nd and more TV sets in a household.

Q5. In the case of multi-TV homes, should the pay television channels for each additional TV connection be also made available at a discounted price?

DCBOA RESPONSE

DCBOA is of the view that Pay channels should not be allowed to collect any subscription for additional TV – rationale for our view is enumerated below.

In the Linear distribution mode there is no return path nor the provision for seeking or providing channels on demand. Further the rate/price prescribed for Pay Channels are for a channel/bouquet of channels, per household, per month.

To be fair, we suggest that Pay Channels should be allowed to charge full Tariff /Rate if subscribers ask for different Pay channel/s (either ala-carte or bouquet) on the other TV sets/STBs within the same household.

No additional charge should be levied on Customers watching pay channels on multiple TV sets in a household.

TRAI should compare delivery of content on non-linear mode (OTT), wherein they allow consumers to watch the content on multiple devices at different places within the same subscription (be it the consumer's home, office or even at a third party locations).

Our view therefore is that in the linear distribution mode, there should ***not be any additional subscription*** whatsoever charged for multiple Television sets within a customer's house/home.

Q6. Is there a need to review the ceiling on discount on sum of MRP of a-la-carte channels in a bouquet (as prescribed through the second proviso to clause4(4) of the Tariff Order2017) while fixing the MRP of that bouquet by DPOs?

DCBOA RESPONSE

Our views is that the percentage of Discounts offered should not be used by the Broadcasters to push unwanted channels and confuse the Consumers and the other stakeholders like the LCOs and DPOs.

Whatever formula TRAI proposes, it should ensure that the customers, should be able to make informed choices in a very TRANSPARENT manner and not be coerced into subscribing unwanted channels.

Q8. Whether the extant prescribed HD/SD ratio which treats 1HD channel equivalent to 2SD channels for the purpose of counting number of channels in NCF should also be reviewed?

DCBOA RESPONSE

The same can continue

Q10. Should there be a provision to mandatorily provide the Free to Air News/Non-News/Newly Launched channels available on the platform of a DPO to all the subscribers?

DCBOA RESPONSE

Our view on this is a clear **NO. It is not required at all.**

We don't see any merit in all channels being offered to all the subscribers, as we do not wish to confuse them with a surfeit of channels, many of which have almost the same content as the other with no clear differentiation.

To be honest, we suspect this to be subtly pushed by Broadcasters with a vested interest to push small Broadcasters out of business.

The reason for our suspicion is being that the moment this rule will come into effect, we will suddenly witness a plethora of channels being launched by the Big Broadcasters using content from their old library as they will automatically get carried on network. This will further result in bandwidth choking (bandwidth means channel carrying frequencies) and channels of small and independent Broadcasters will either not get carried or get displaced in the channel line-up.

Q11. Should Tariff Order 2017, Interconnection Regulations 2017 and Quality of Service Regulations 2017 be made applicable to non-addressable distribution platforms such as DD Free Dish also?

DCBOA RESPONSE

DCBOA stand on this is very clear - No Platform/Entity, irrespective of Ownership, Intent, Market or Target Audience should be allowed to Offer Channels / Services in a non-addressable mode in India.

DAS was introduced as an Act by passing the bill in the august house of the Parliament after detailed deliberations and the underlying principle was that all the channels/services necessarily need to be Digital and Encrypted and all the Distribution platforms should strictly comply with all the Rules & Regulations and

QoS prescribed under DAS. ***The reason /argument put forth in the discussions for migrating to a fully Encrypted, Digital service was to bring in Transparency for all stakeholders and to get to know the Actual Subscriber numbers subscribing to the services. However, Free Dish, a wilful violator, has been illegally offering un-encrypted Service by violating this basic fundamental purpose.***

Our suggestion for **Free Dish** are that they should:

- a. operate only as a fully Addressable System
- b. All services/channels on Free Dish should be offered as an encrypted service.
- c. Free Dish should charge the NCF from the subscribers, as prescribed under the regulations
- d. Comply with all the prescribed QoS norms in DAS

If the time to migrate to a fully addressable system complying to all QoS parameters prescribed under DAS is time consuming, Free Dish should immediately offer only DD Channels in their service offering.

Free Dish, for too long, has been violating the provisions of DAS regulations by:

- i. Non Collection of NCF
- ii. Non collection of GST (Serious non-compliance issue). TRAI should also keep in mind the Revenue loss to both central and state government exchequer on account of Free Dish not collecting GST.
- iii. Unencrypted Telecast of FTA and Pay channels of Private Broadcasters in DAS
- iv. Non collection of pay channel subscription
- v. Violation of DAS rules by not declaring subscriber number to Pay Broadcasters

While on this, we urge TRAI to also find out how come Broadcasters who conduct multiple audits and undertakes microscopic examinations of all system and processes in DAS and denies content at the slightest slip in processes including for small independent MSOs operating in small towns, has willingly provided their IRDs for receiving and transmitting their channels to Free Dish, which is offering services without any Encryption or Audit, in blatant violation of the provisions of DAS.

Rules and regulations have to be common for all business entities operating in the same business ecosystem. If we look at PSUs operating in other domains, we find all of them are competing with Private sector business on similar terms. We don't see any reason why Free Dish should "Not Comply" with all the provision of the DAS regulations.

Q12. Should the channels available on DD Free Dish platform be mandatorily made available as Free to Air Channels for all the platforms including all the DPOs?

DCBOA RESPONSE

In our opinion this is a fallacious and flawed question to be discussed and it will be inappropriate to offer a direct answer to this question.

We don't mind DD Channels being transmitted on Free Dish without Encryption to enable it to reach audiences that the other platforms such as Cable and DTH are unable to reach or service.

All the channels from Private Broadcasters which are available on Free Dish should be immediately stopped and pulled out of Free Dish, as these channels are being telecast in Violation and disregard to DAS Regulations. Free Dish should have offered their services only to those consumers / households, which fall under the BPL Category, as it is a Free Service and that too only DD Channels.

Today, in India, we have in place one of the world's best mechanism which has identified households falling under the category of BPL (Below Poverty Line) and

they have been provided the “Saffron Ration Card”. Free Dish should be offered only to those households. ***Instead today we have a scenario where many families residing in the upscale and rich neighbourhoods of the top cities have Free Dish for the 2nd @ 3^d TV sets.***

We also would like to state that the content being offered on Doordarshan is compelling, engaging and of very good quality, both in substance and content quality. We are of the opinion that the Public Broadcaster should feel happy to offer such content and not dilute its worth by offering channels of Private Broadcasters alongside DD Channels on Free Dish and by doing so they are actually forcing consumers to watch such channels instead of DD Channels

Another point which we want TRAI to intervene is to Stop the advertisement of Free Dish on DD Channels and Channels of Private Broadcasters, since these channels are marketing Free Dish services to customers of Cable TV & DTH, which is basically resorting to unfair trade practices.

Free Dish is free to use any other Media to market their services, except media which is carried by their competition such as Cable TV and DTH.

Q13. Whether there is a need to consider upgradation of DD Free Dish as an addressable platform? If yes, what technology/mechanism is suggested for making all the STBs addressable? What would be the cost implications for existing and new consumers? Elaborate the suggested migration methodology with suggested time-period for proposed plan. Please provide your response, with justification.

DCBOA RESPONSE

Absolutely Yes. We cannot have any platform operating in Gross Violation of DAS Rules.

DD Free Dish should be an Addressable Platform. (Our view is that TRAI should ensure Non-discrimination and the level playing field amongst all service providers and further the interest of consumers should be of paramount importance while framing rules and regulations).

If the migration from a Non addressable to an Addressable Platform is going to be complex, costly and time consuming exercise, we suggest the following steps listed below to be implemented immediately, as Free Dish has been functioning in Gross Violation of DAS Regulations and is also against the rights of Equality and Right to do business, as enshrined in the Constitution of Bharat.

Our Suggestions therefore are:

- i.* Pay Broadcasters should forthwith discontinue their signals to Free Dish and seek return of their IRDs from Prasar Bharti
- ii.* Free Dish should stop telecasting all the FTA channels of Private Broadcasters.
- iii.* Only DD Channels should be made available on Free Dish

Q19. Should the revenue share between an MSO(including HITS Operator) and LCO as prescribed in Standard Interconnect Agreement be considered for a review?

DCBOA RESPONSE

YES. On behalf of the LCO, we would like to state that the revenue share accorded to the LCO/LMO in DAS, till date, has been grossly unfair. At the same time, we

thank and appreciate TRAI for raising this point of sharing all revenue with the LCOs, for discussion.

The MSO's own less than 5% of the consumers (direct points) and most cable TV subscribers are owned by the LCOs/LMOs. More than 90 to 95% of all outdoor infrastructure laid to deliver the services to consumers can be ascribed to the LCOs/LMOs. Yet, till date, only the subscription revenue (and that too a minority share) was sought to be shared with the LCO/LMO.

Another factor that needs to be considered is that the ground infrastructure required to deliver the channels / services of Broadcasters and received from the MSO to the consumer, is almost entirely overhead and therefore open to vandalism and exposed to the vagaries of nature. To ensure uninterrupted delivery of services, there is a constant need to keep replacing the infrastructure and being overhead, Insurance is not available on these investments.

Despite these challenges and pitfalls, the LCO/LMO as true entrepreneurs, without considering the ramifications or profitability of their business have always replaced the infrastructure to ensure continuous supply of service to the customers.

Considering all the above, we suggest that the LCO/LMO deserves to be ascribed a significantly higher share of NCF revenue and for revenue generated from supplementary /additional sources accruing from the entire business, an equal, if not higher share of revenue, compared to the MSOs.

19(i) Should the current revenue share on NCF be considered for a revision?

DCBOA RESPONSE

YES. Considering the infrastructure laid to deliver services to consumer, it is fair to seek a 75% share of NCF to the LCO/LMO. Just wanted to share that in the previous CAS regime and even in the initial DAS regulations, the LCO was given a much higher share of NCF, which for no explicable reason was suddenly reduced to a minority.

19(ii) Should the regulations prescribe revenue share on other revenue components like Distribution Fee for Pay Channels, Discount on pay channels etc.? Please list all the revenue components along-with the suggested revenue share that should accrue to LCO.

Please provide quantitative calculations made for arriving at suggested revenue share along-with detailed comments/justification.

DSPF RESPONSE

Absolutely Yes.

For the past 10 years since the inception of DAS, the LCO/LMO has been completely side lined and our legitimate demands and pleas have been thrust aside and only a token share has been given from only Subscription revenue

If one tries to discern the revenue sources accruing in the distribution business in a fair and dispassionate manner, it is clearly evident that all the supplementary revenue sources (Other than pure subscription) including Carriage, Placements, LCN, Bundling, Advertising on PS etcis dependent on the weightage of **People Meters** placed in households belonging to the LCOs customer and is also dependent on the subscriber base. Just to reiterate once again that subscribers are owned by the LCO/LMO and just 3 to 5% subscribers are owned by the MSO.

Again, the delivery of services including content is predominantly through the LCO infrastructure in the Cable TV business and the customers belong to the LCOs/LMOs.

Therefore, all the revenues earned by the DPOs, some of which is mentioned below, should be shared with the LCO/LMO:

- i. Carriage Revenue and or business development Revenue.
- ii. Revenues earned from Placements of channels and LCNs
- iii. Selling commercial time on Platform Services as well as Barker Channel aired by MSO

iv. Discounts given by Broadcasters for bundling their channels

v. Marketing Fees offered by Broadcasters to MSO

We urge TRAI to propose and recommend regulations such that the MSOs share all the revenues earned by the MSO with a majority if not equal revenue share to be accorded to the LCO/LMO.

While recommending revenues from sources other than Subscription to be shared with the LCO/LMOs, TRAI should ensure that all inter-stakeholder commercial deals and Agreements detailing the terms of such transactions/deals between the Broadcasters and DPOs should be “Tripartite Agreements” between Broadcasters, DPOs and LCOs, so that there is transparency in all commercial deals and the LCO is also fully informed and be made aware of all contents of such agreements.

By leaving the LCO out of the negotiations and agreements, TRAI, till date was violating the 3 fundamental rights of the LCO/LMO:

1. Right to Equality
2. Right to Livelihood
3. Right to Information, as enshrined in our Constitution.

We therefore suggest and recommend that all sources of revenue such as Carriage, LCN Placement, Advertisement revenue, Marketing fees and Discounts offered by Broadcasters and any other revenue that accrues to the MSO, be shared with the LCO, in an equal manner, if not a higher share.

DAS was introduced to usher in transparency in the business, but almost all regulations recommended by TRAI till date seems to be focussed at controlling only the subscription revenue earned from consumers and completely ignores advertisement revenues earned by the Broadcasters, which again is dependent on the subscriber / consumer that the last mile player connects using their infrastructure and investments (LCO, MSO and DTH players).

We request TRAI to reconsider the **revenue shared on Pay Channel Subscription** and re-work the revenue share to 50% Broadcaster: 50 % DPO (in case of Cable TV business 25% each to LCO/LMO and MSO or for DTH it should be 50%, each for the Broadcasters and DTH Player).

The rationale for our view posted above on sharing of Subscription of Pay Channel is that Broadcaster's gets to retain all the revenues earned by them on advertisements and by selling commercial time on their channels, so their share on subscription should not be more than 50%.

TRAI has allowed Broadcasters complete freedom to price their pay channels – there is Forbearance. This allows the Broadcasters to generate as much revenue as they are worth from the consumers willing to pay them. What it also implies is that all Pay channels should therefore be **Advertisement-free**. Forget being advertisement-free, Broadcaster's in complete disregard to rules and regulations runs commercials/advertisements much more than the rules prescribed under QoS.

Q20. Should there be review of capping on carriage fee?

DCBOA RESPONSE

DCBOA recommends Forbearance and no capping on Carriage fees.

TRAI has recommended forbearance on Prices /Rates of Pay channels to the Consumer despite the fact that Prices / Rates of Pay channels **DIRECTLY** affects close to 800 million consumers.

At the same time TRAI has been recommending capping on carriage fee, which is clearly a business to business transaction and this is something which the Consumer is not affected or inconvenienced in any manner- -so why try and regulate or propose capping.

The irony, is that as far as Broadcasters and revenues earned by them are concerned, there is either no regulation or disclosure sought or there are light-touch regulations, but when it comes to revenues earned by the Distribution partners, there are tough and water-tight regulations.

As far as the smaller Broadcasters are concerned, in a purely Digital ecosystem, there is enough bandwidth to accommodate a good number of channels (although not unlimited) and we anyways support the recommendation to place all channels of similar genre within a certain LCN bracket, so the broadcasters fears are addressed and they are not unduly harassed.

At the same time one needs to appreciate that we are migrating to the non-linear delivery mode and all prospective channel/content owner has the option of launch OTT platforms at much lower cost to reach out to their target audience.

Q21. To increase penetration of HD channels, should the rate of carriage fee on HD channels and the cap on carriage fee on HD channels may be reduced. If yes, please specify the modified rate of carriage fee and the cap on carriage fee on HD channels. Please support your response with proper justification.

DCBOA RESPONSE

We see no justification in increasing penetration of HD channels or reducing the Carriage fees for such channels. The Broadcasters initially asked for higher subscription for HD channels and now we are surprised to see this request.

Today, most boxes offered to customers are HD and if there is customer demand, the service providers will offer more HD channels. At the same time one has to keep in mind that 5G, 6G and the next generation of Telco spectrums will keep growing away into the spectrum in which Cable TV is operating (within a wired infrastructure) and adding more HD channels will clearly impinge on adding new channels or it would mean removing some channels of smaller Broadcasters.

It, therefore, means that it makes little sense to keep offering more HD channels.

Q22. Should TRAI consider removing capping on carriage fee for introducing forbearance? Please justify your response.

DCBOA RESPONSE

Yes. Forbearance has been prescribed on Pay channel subscription rates and we have always supported this view. Similarly there is absolutely no constraint on the rates for the commercial time offered to advertisers and sponsors of programs. Pray why is TRAI seeking to cap carriage fee rates. The Cable networks needs massive amounts of investments to upgrade the network to make it a full two-way delivery network and it is fair to expect a part of this investment come from Carriage revenue.

Q24. Whether the extant charges prescribed under the ‘QoS Regulations’ need any modification required for the same? If yes, justify with detailed explanation for the review of:

a. Installation and Activation Charges for a new connection.

DCBOA RESPONSE

Inflation, cost of distribution hardware, salaries and other expenses are increasing by the day. Besides, there has been no upward revision in the activation charges over the last 2 to 3 years.

We suggest forbearance, as the cost for connecting a new customer differs from customer to customer even with the same locality. Our view is charging of Activation fees should be left to the LCOs/LMOs, who understands their customers and are capable of working out the rates accordingly.

Other factor to be kept in mind is that Cable TV subscriber numbers are on the decline but the fixed cost and Opex is increasing due to the reasons mentioned above.

Any other matter related to the issues raised in Present consultation

DCBOA RESPONSE

We have tried to offer our views and comments to as many points as possible and would also like to highlight a few other key concerns without wanting to denounce any stakeholder or entity, but only to protect our interest so that we get our legitimate recognition and dues.

The reason why we have raised these points are to highlight the plight of the LCO/LMO, who have been the founding members of this Billion Dollar+ industry,

having put their blood, sweat and investments to create this ubiquitous distribution edifice on which the entire Broadcasting, Cable and even the wired broadband industry is standing. What we are seeking is a level playing field and an equitable revenue share from various sources of revenue.

DCBOA would like to use this consultation to highlight one of our biggest grievance, which is the number of cases filed against our members in TDSAT and other courts, most of it on false grounds and motivated with ulterior objective of pressurizing and harassing the small and vulnerable LCO/LMO.

As stated earlier, our members can be categorized as micro to at best small enterprises and it almost impossible for our members to hire lawyers or even attend court hearings for multiple cases that are filed against them. Today, we have a scenario where there are very limited number of MSOs and many of them claim direct or indirect ownership to just a couple of companies. Most of the big corporate MSOs are working like cartels and the LCO/LMO is always under constant pressure. It is clearly evident that these are pressure tactics being filed just to harass the LCO/LMO and this is happening because of the opaque inter connect stakeholder agreements.

To ensure Transparency, we humbly solicit a just and fair regulatory regime that recognizes the challenges and problems faced by the 1 million+ weak stakeholder and recommends rules and regulations that is fair to them and comforts the LCO/LMO.

We would like TRAI to make a few fundamental corrections in the interconnect agreements, which we believe should be without any open clauses, which are open to interpretation or having words referring/ implying phrases such as “Open to negotiation between stakeholders”. The reality is that MSOs are big and powerful Media entities with a lot of resources of all kinds available at their disposal and the LCO/LMO are fragmented and very small entities, easily open to manipulations. Negotiations can happen between two or more entities of equal or almost equal stature but not between stakeholders of disproportionate strength and resources. That is where a compassionate and an understanding regulatory regime is required.

DCBOA seeks the indulgence of the Regulator to consider the following points mentioned below and propose changes to the regulations:

1. *We have been demanding both Monthly or Term Invoice and subscription receipts to be issued by the MSOs to the LCOs for every transaction made or to provide a line-wise, itemised billing for Top-ups made by the LCO on the Portal, with a copy submitted to TRAI with details of outstanding, is any.*

This is to ensure that the MSOs don't keep filing false or inflated outstanding on any LCO who looks to migrate to a competing MSO or create their own independent MSO business. Slavery and Bonded labour, we thought, was supposed to be a relic of the past, but looking at the number of false and motivated cases filed against the LCO/LMO, one is compelled to think that we are going back to the dark ages. We sincerely hope TRAI takes cognizance of the problem and helps our members get free from such stifling practice.

2. *MSOs to be told to issue Invoices and Receipts to the Subscribers and LCOs clearly mentioning the status of the STB (The Invoice should clearly mention whether the STB issued by the MSO has been offered on Outright Sale or Lease or Rental basis). If Sold to customer, MSOs to issue GST receipts, if provided on Lease then details of monthly EMI and the remaining term for transfer of asset to customer or if given on Rent, the Security Deposit and the monthly rent to be detailed clearly. We suppose, tThis was always*

The LCO/LMO has to be completely freed from the onus of handling the issues of the STB, as the STB is the property of the MSO who have decided the terms of purchase as well as sale /offer of the STB to the customers and they cannot put any responsibility of the STB on the LCO/LMO in any manner whatsoever. We also call for regulations to ensure that a copy of all of these bills to be sent to TRAI (or Designated Nodal Officers) for records.

3. ***STB Interoperability and portability*** ,like in the Telecom industry we urge TRAI to free customers from the pain of sticking with a poorly performing Service provider/MSO.

We would also like to draw your attention to the fact that we feel aggrieved due to the exclusion of the LCO/LMO in some of the key stakeholder discussions called by TRAI, which excluded the LCO/LMO.

In Annexure I of the Consultation and Notes titled “Salient features of the Regulatory Framework 2017” it details the features listed out -- For

Consumers, For Broadcasters, For Framework 2020” there is detailed description on Benefits for Consumers, Benefits for Broadcasters and Benefits for DPO. However, there is no mention of any features nor any benefits for the LCOs.

While our members may not be very eloquent and articulate in our demeanour, but we understand the most vulnerable stakeholder - the CONSUMER, better than any other stakeholder or entity. We request TRAI to consider inviting our members to such discussions as we may be able to better convey the challenges of implementation of many of the key aspects of this business.

We humbly request TRAI to appreciate our problems and help us become a deserving stakeholder who can also contribute to our great country, India in its quest for achieving glory in the Digital world.

With warm regards,

For Digital Cable & Broadband Operators’ Association

s/d-- Jayashree Mukherjee

Smt. Jayashree Mukherjee

Convenor

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