

DELHI DISTRIBUTION CO.

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COMMENTS / SUGGESTIONS AND RECOMMENDATIONS ON TRAI
CONSULTATION PAPER No. Part-III-SECTION-IV OF 2013 DATED 06th Aug,
2013

BY RAVI GUPTA – PROP.-DDC ON 21st Aug, 2013

(AN INDEPENDENT MSO IN DELHI)

21st Aug, 2013

The Chairman
Telecom Regulatory Authority of India
New Delhi – 110002

Sub: Consultation paper on distribution of TV channels from Broadcasters to Platform operators.

This is to congratulate you for creating an excellent consultation paper on the subject. We endorse the opinions expressed by TRAI and feel that it is the need of the day. It will go a long way in ending the consumer woes regarding forced subscription to bouquets.

However, we feel that if the following points are clearly brought out in your recommendations to the government on the subject:

1. No broadcaster shall act as an authorised distribution agent for another broadcaster.
2. No distribution platform operator (DTH, MSO, LCO and agent of distribution platform) shall act as an authorised distribution agent for any broadcaster.
3. There should be no stake of any broadcaster, distribution platform operator like DTH Operator, MSO, LCO and any of their investor in the authorized distribution agent appointed by broadcaster.
4. It may be ensured that point no. 15 of the explanatory memorandum of your consultation paper, is included in your recommendation to the government so that government enforces it on the industry in letter and spirit.
5. There should be a cap on maximum number of channels per broadcaster because there is a fear of consolidation / acquisition / taking Indian rights of

uplinking / downlinking of channel by large broadcasters over small broadcaster. Again a similar cartel situation can arise and this time by large broadcasters in place of aggregators.

Thanking you

RAVI GUPTA (PROP.)

Ph: 011-26535270 Mob: 9810499760

Email: ravigupta@inddc.in ravigupta001@gmail.com