

**ETV NETWORK's views on  
RESTRUCTURING OF CABLE TV SERVICES**

*(ETV's Viewpoints are marked in RED)*

4.1 The technological advancements, convergence, and increasing popularity of value added services and applications require more vibrant and effective regulation for cable TV industry. Present eligibility criteria do not clearly define a person and also do not take into account financial strength, technical strength and experience of the applicant to provide cable TV services. Do you feel that present regulatory framework requires change? Please give suggestions with justifications.

**The present regulatory framework requires change. Currently, any personnel willing to provide cable TV services can simply apply and take a license. No background check is made on the personnel's infrastructural ability – which is a primary determinant for providing quality service to the subscribers of Cable TV service. The authority should appoint authorized officers to ensure only persons having enough financial, technical strength and experience can apply to run cable networks. Basis of the CS population of each city, town and village, even the number of applicants can be derived. There must be a clause of RENEWAL of License every year, where-in the authorities can grant and cancel the license basis of the Quality of Service audit, which the Authorities will be entailed to carry out for respective Cable Operators operating in respective city, towns and villages. Different parameters may be fixed for financial and technical , depending on the population of the city town or village.**

4.2 The registering authority may refuse the grant of registration in case of non submission of any document required by him as the application form does not clearly list out the documents to be submitted. In view of this should a comprehensive list of documents required to be submitted along-with the application of registration be mentioned in the application form itself? Similarly is there a need to make provisions for the appellate authority in case of refusal of registration by the registering authority?

**There must be a comprehensive list of documents required to submit along with the application. The list of documents, should highlight, infrastructural capability (no.of channels that he can carry), proposed area of operation, number of subscriber targeted, the intent and definition of the value-add services that he proposes t provide, financial capability and resources to establish a cable network etc.**

4.3 The present cable TV industry is subjected to minimum supervisory guidance and control. Do you feel that there is a need to streamline registration process, data collection and monitoring to ensure better cable TV services to customers? Is there a need to have a centralized/ decentralized authority where all the information relating to cable TV sector and also monitoring is managed? If yes, then what should be the structure and scope of work of such an agency? Please, give suggestions with justification.

**Yes. There should be a central authority having its authorized officers in every state to oversee the functioning of cable networks. The agency will be authorized to audit and carry out surprise checks of the cable operators, and**

**will also have the authority to cancel the license if any deviance is found from the set standards and regulations for providing quality cable services.**

4.4 Present cable TV registration, the Cable Act and the Cable Rules do not cast any specific responsibility for effective customer grievance redressal. What changes do you suggest to bring in effective consumer grievance redressal mechanism?

**Follow the approach adopted by USA**

4.5 At present by and large only one cable TV operator is providing service in a locality. Is there a need to introduce competition with more than one operator? Please give your suggestions with justifications.

**There is definitely a need to introduce competition. Depending on the size and population initially, three (3) operators may be given license and after three years it can be reviewed and more licenses can be issued if necessary.**

4.6 Any other regulatory reform.

**Monopolies of Cable Operators are to be curbed. There should be a single authority for registration, sales, and entertainment tax.**

4.7 In view of deliberation in para 3.2, is there a need to modify provisions of the Cable Act/ Cable Rules? Please give your suggestions with justifications.

**The criteria of Quality of Service must be incorporated. The QoS parameter will be entail the adherence to all other parameters and standards.**

4.8 In particular, suggestions may be given for a proper regulatory framework on the following issues, among others:

(iv) Correct determination of subscriber base

**CAS is to be implemented in a phased manner which will entail the correct determination of subscriber base.**

(v) Laying a good quality network

**BIS to be mandated and implemented.**

(vi) Permission and monitoring of ground-based channels offered by MSOs and LCOs.

**Content code is to be mandated and implemented. The authorities should check on its adherence by respective cable operators of a region.**

4.9 Presently MSOs are also registered as Cable TV operators. Do you feel the need for a different regulatory framework for MSOs in view of discussions in section 3.3? Give your

suggestions with justification. The suggestions may specifically cover, among others, the issues relating to registration of multi-city MSOs, monitoring mechanism, number of MSOs in a city/state etc.

**Separate Licenses are to be issued for MSO and LCO. Though MSO should own responsibility of LCO with regard to the quality of service, it should not be allowed to create new operators without the new local operator procuring license from the authorities. Basically, any new Local Operator has to procure license and then choose to join a MSO and not vice-a-versa. The existing cable home population for respective city or state can be considered to determine the permissible number of MSOs. For granting license the rider should again be the infrastructural and financial capability of the applicant MSO.**

4.10 What QoS parameters should be prescribed for non CAS areas to address concerns of the customers keeping in view the present status of networks? What should be the points in the network to define various signal parameters such signal strength, S/N ratio etc? What should be the monitoring mechanism to ensure effective implementation?

**Follow the Policy as is adopted in USA.**

4.11 In view of technological advancement, convergence, and increasing competition up-gradation of cable TV operators network will be desirable; however it may require significant investments. Please suggest how cable TV operators can be encouraged to upgrade their network both in their business interest and in interest of customer to provide better services?

**If Cable Distribution, as is the case with Broadcast, is recognized and declared as an industry, the banks and financial institutions approached for loans.**

4.12 Is standardization of encryption and subscriber management software feasible? Please, give comments with justification.

**The present encryption software as is used by major broadcasters can be standardized, as the nature of transmission is similar for all major broadcasters. Standardization of SMS may be left to the MSOs – as the subscriber base and locality/area of operation will be the basis of developing the SMS, which will vary between from MSOs to MSOs.**

4.13 What should be the consideration, important criteria and guiding factors for prescribing the transition path for the existing cable TV operators and MSOs to the revised regulatory regime? Please, give suggestions with justification.

**The population classifications of places can be used to prescribe the transition path. Starting with Metros, it can be followed in the order of 10 Lac + pop cities, then 5lac to 10lac pop towns, then 1lac to 5 lac pop towns. Then 20,000 to 1 lac and below 20,000 populated towns**

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