

Comments on Consultation Paper

A. Issues related to amendments to the Interconnection Regulations applicable for Digital Addressable Cable TV Systems.

Carriage fee

(1) Whether the following proviso should be introduced in the clause 3(2) of the interconnection regulations for DAS and the clause 3(5) of interconnection Regulation for DAS should be deleted.

“provided that the provisions of this sub-regulation shall not apply in the case of a multi-system operator, who seeks signals of a particular TV channel from a broadcaster, while at the same time demanding carriage fee for carrying that channel on its distribution platform.”.

(2) If no, the reasons thereof.

Reply: Yes, I agree with the proposed third proviso introduced in TRAI regulation on DAS clause 3 (2) by deleting the clause 3(5).

Minimum Channel Carrying Capacity of 500 Channels for MSOs

(3) Whether there is a need to specify certain minimum channel carrying capacity for the MSOs in the interconnection regulations for DAS.

(4) If yes, what should be the different categories (example cities/town/rural area) of areas for which minimum channel carrying capacity should be prescribed and what would the capacity for each category.

Placement Fee

(5) Whether there is a need for regulating the placement fee in all the Digital Addressable Systems. If so, how it should be regulated. The stakeholders are requested to submit their comments with justifications.

Reply: No comments.

B. Issues related to amendments to the Tariff Order applicable for Addressable Systems.

Twin conditions at retail level

Reply: Yes, I may be agreed with the prescribed twin conditions of TRAI with a request to clarify/ implement the following:-

- ❖ On what basis/calculation the ceiling of Rs.3/- factor is proposed by TRAI to calculate ascribed value of a pay channels in a bouquet.
- ❖ A-la-carte rate of channel (Pay or FTA) offered by the MSOs/ LCOs to consumers on addressable system need to approved by TRAI first before enforcing at consumer end. Because as a consumer, we are not able to justified a-la-carte rates at retail level.

Minimum Subscription Period

(7) The stakeholders are requested to offer the comments, if any, on the proposed deletion of the word „pay“ in clause 6 and 6(2) of the principal tariff order dated 21.07.2010.

Reply: No comments.

Freedom to choose the channel(s) on a-la-carte and/or bouquet(s)

(8) The stakeholders are requested to offer their comments, if any, on the proposed inclusion of the following provision after sub-clause 6(4) in the tariff order dated 21.07.2010, as amended.

“It shall be open to the subscriber of the addressable systems to subscribe to any bouquet(s) or any bouquet(s) and any channel(s)(pay or free to air) or only free to air channels or only pay channels or pay channels and free to air channels”

Offerings of Bouquet(s) of channels which require special Set Top Boxes (STBs) such as High Definition Television (HDTV) or Three Dimensional Television (3D TV) channels etc.

Reply: - Yes, I fully agree due to the following reasons: -

- ❖ At present, the service providers are binding the consumer to choose add-on packs with a –la-carte channels after availing the base pack bouquets offered by them. In other words the consumers are not free to choose add on pack/ a-la-carte channels without taking base pack of the service providers.

Therefore, I strongly believe that the word “available at the platform of service providers in any shape” needs to add in the proposed provision “It shall be open to the subscriber of the addressable systems to subscribe to any bouquet(s) or any bouquet(s) and any channel(s)(pay or free to air) or only free to air channels or only pay channels or pay channels and free to air channels”. **By inserting the proposed amendment your heading “Freedom to choose the channels(s) on a-la-carte and / or bouquet(s)” will fulfill otherwise the problem will remain same.**

Offerings of Bouquet(s) of channels which require special Set Top Boxes (STBs) such as High Definition Television (HDTV) or Three Dimensional Television (3D TV) channels etc.

(9) Whether the channels that require special type of STB be offered only on a-la-carte basis or as part of separate bouquets that consists of only those channels that require a particular type of specialized STB.

Reply : Yes, I agree that the channels that require special type of STBs be either offered on a-la-carte basis only or as separate bouquets that consist of only those channels that require a particular type of STBs for its reception.