

To,  
Mr. Wasi Ahmad,, Advisor (B&CS),  
Telecom Regulatory Authority of India,  
[traicable@yahoo.co.in](mailto:traicable@yahoo.co.in), [advbcs@traai.gov.in](mailto:advbcs@traai.gov.in)

**Subject: TRAI Consultation on Draft Tariff Order prescribing framework for commercial interoperability of Customer Premises Equipment (CPE) in DTH services dated 27th February, 2015**

We at VOICE as part of our advocacy initiative in Telecommunications & Broadcasting continuously raise different issues with Policy makers impacting consumers based on the knowledge through Consumer feedbacks.

As registered CAG with TRAI we are in forefront of providing inputs to TRAI related to consumer concerns and interests.

In continuation of this effort on behalf of Broadcasting consumers we at VOICE have following response to the questions posed in the consultation paper:

**VOICE comments are as under:-**

**Issues for Consultation:**

**Framework for commercial interoperability of Customer Premises Equipment (CPE) in DTH services**

At the outset we foresee following un-addressed consumer issues in the options proposed-

1. DAS is not a option for the consumer
2. Consumer is buying a service i.e. broadcasted signal on his viewing equipment either TC/Computer or any other similar device.
3. Hence all the equipment including CPE are incidental to the service being contracted.
4. So CPE if at all required has to be provider's
5. At the most there can be a minimum contract period to defray initial installation costs incurred by the DTH operator.
6. This automatically will put a cost on interoperability to the consumer except in the case of bad service for which QOS rules need to be framed.
7. TRAI will observe that in this model suddenly all DTH operators will declare the life of CPE to be 10 years.
8. What happens if technology changes/upgraded requiring the CPE/STB to be changed before 5 years?
9. If a service provider closes shop, what happens to the deposits?

10. Why a return of 15% should be provided for CPE/STB- it should be at cost as it is an essential requirement and the cost+margins should be built into the monthly subscription or is it that TRAI wants to provide them with a cost+ revenue structure leaving no incentive for efficiencies.
11. Is the cost of CPE/STB considered for this consultation retail market price or bulk purchase cost of the service providers?
12. So even if a consumer wants to change the service provider for bad-service he still has to compensate for this bad service by paying penalties for leaving before 5 years.
- 13.

## **VOICE SUGGESTIONS:**

1. ALL CPE/STB should be part of the set up to be provided without any set-up fee/ activation fee etc. There can be a deposit of say Rs.500 for DAS / Rs.1500 for DTH which should be adjusted (defrayed) in consolidated monthly charges over a period of say 3 years.
2. Any disconnection request from the consumer before 3 years will entail proportionate deduction from the security deposit.
3. No other rental/installation/activation charge should be allowed.
4. All maintenance/replacement/upgradation will be done by the service provider without any charge to the consumer.
5. This will take care of the portability issue as well, as consumer will know the cost of changing service provider.

**Hemant Upadhyay**  
**Advisor- IT & Telecom**

**19/03/2015**

Consumer VOICE  
O-45, Basement, Lajpat Nagar II, Ring Road  
New Delhi-110024  
Ph. 011-24370455 / 47331025 Fax 011 24379081  
[www.consumer-voice.org](http://www.consumer-voice.org)  
<http://www.consumer-voice.org>