



**Response to Consultation Paper on Draft  
The Standards of Quality of Service and  
Consumer Protection (Digital Addressable  
Systems) Regulations, 2016**

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## Introduction:

At the outset we would like to thank the Authority for publishing the **Consultation Paper on Draft Standards of Quality of Service and Consumer Protection (Digital Addressable Systems) Regulations, 2016** and giving us an opportunity to furnish our comments on the draft interconnect regulations.

We are of the opinion that the “Regulated QoS Framework” and the proposed regulations would go a long way in ensuring a level playing field for all types of Digital addressable systems. The proposed uniform QoS regulatory framework would help in increasing the trust and ease in doing business by the various service providers/Distribution Platform Operators and increase in consistent consumer awareness.

## Regulations from draft QoS Regulation that needs to be relooked into by the Authority

We feel that the clauses mentioned in the table given below need to be looked into by the authority to ensure a level playing field to all the stakeholders in the new DAS regime.

<u>Clause No.</u>	<u>Comments</u>
<u>Clause 4 (6)</u>	<p>Factors that have been considered for prescribing the installation charges @ Rs. 350/- to be explained.</p> <p>There is a cost involved with regard to laying of Cables, manpower, infrastructure used for communicating with DPO for activation, transportation of CPE for activation and etc. Hence the charges may be increased.</p>
<u>Clause 4 (7)</u>	<p>Factors that have been considered for prescribing the activation charges @ Rs. 100/- to be explained.</p> <p>There is license fee involved in SMS and CAS for any such activation and hence the charges may be increased.</p>
<u>Clause 9</u>	<p>Factors that have been considered for prescribing the restoration charges @ Rs. 25/- to be explained.</p> <p>The process involved for verification of request and restoration and hence request for the charges to be increased.</p>
<u>Clause 9 (3)</u>	<p>Factors that have been considered for prescribing the reactivation charges @ Rs. 100/- to be explained.</p> <p>The process involved for verification of request and reactivation and hence request for the charges to be increased.</p>

<b>Clause 11</b>	Factors that have been considered for prescribing the installation charges @ Rs. 700/- and activation charges at Rs. 200/- in case of shifting to be explained.		
<b>Clause 14 (4) (i)</b>	The response time period provided for the calls made on consumer care number to be made at par with the Broadband service provider.		
	<b>Response time period</b>	<b>QoS for Broadband service provider</b>	<b>QoS for Cable TV distributor</b>
	% of calls answered by the Operators (voice to voice) within 60 sec	>60%	=80%
% of calls answered by the Operators (voice to voice) within 90 sec	>80%	=90%	
<b>Clause 26 (6)</b>	The maintenance period under rental scheme and other scheme/bundled scheme of CPE for a minimum period of 5 years. The said period is too long for an electronic equipment and we request the Authority to reduce the same to 2 from 3 years.		

## Conclusion

### Our suggestions are:

1. We request the Authority to consider and increase the installation, activation, restoration and reactivation charges.
2. The response time with regard to call centre performance to be at par with the broadband service providers.
3. The maintenance period of STB/CPE under rental scheme and other scheme/bundled scheme to be reduced to 2 from 3 years.
4. The Authority may consider extending the Visiting charges of 250 to all DPOs (not only DTH operators) as this involves manpower cost for all the DPOs.

We would like to request the Authority that it should ensure that it effectively enforces the regulations on the various stakeholders including the LCOs to meet the objectives of the regulations.