

Subject:Comments on 8th Tariff Order, B&CS, Adressable systems
Date: Mon, 24 Oct 2016 05:51:10 +0000
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To
The Principal Advisor
B&CS, TRAI

Sub- Comments draft Telecommunication (Broadcasting and Cable Services) (Eighth)
(Addressable Systems) Tariff Order, 2016

Sir,

We the Cable Operators Forum of Assam (COFA), a registered Association of LCO from various parts of Assam would like to congratulate the TRAI for its sincere effort to streamline the Cable Tv industry through its latest 8th Tariff Order, 2016.

That TRAI has left no stone unturned in satisfying the various stake holders of the cable tv industry, attempted to polish the different activities from top to bottom in smooth operation of a cable network.

That some of the aspects in the Tariff Order still keeps us LCO unsatisfied , for which we from COFA would like to draw the attention of TRAI to the following parts of the Tariff Order, since it is detrimental to the interest of us LCO.

Firstly the revenue share between Broadcasters, MSO & LCO is totally unacceptable. Broadcaster's cost of production or content delivery has no relation with variation in consumer size.

Once signals uplinked by broadcasters, the responsibility for retransmission & downlink falls on the distributors. The more the number of consumers, the more the operational cost increases. The LCO serves the consumers through the network built by him at own expenses, installing all necessary equipments & machineries, taking care of un interrupted round the clock service to the consumer. Fiber optical cables with compatible equipments for enabling larger bandwidth, carrying digital signals, power units, batteries, inverters, generators for overcoming power cuts are the responsibility of LCO. Ultimately, with the variation in size of consumers, the operational cost varies directly.

The MSO are open to revenue from advertisement, channel placement, discount from broadcasters, whereas LCO has to be satisfied with subscription revenue from consumers only.

That Sir, in above context we request the revenue sharing between broadcasters, MSO & LCO per subscriber per month be, Broadcasters-25%, MSO-35% & LCO-40%.

Next, the Tariff Order mentions of same rate fixation by broadcasters for one geographical region. Sir please elaborate about the all India scenario. Does it imply that

same channel shall have different rate in various parts of India? What shall be the rate for a channel offered by a MSO situated in Kolkata? One MSO situated at Kolkata, one at Guwahati & both operating in Guwahati. So under this circumstance, how will rate be fixed?

Sir, our suggestion in such cases is the rate shall be fixed in the same line as done by Ministry of Information & Broadcasting, Government of India for DAS- Phase1, 2, 3 & 4. The rate be categorized on basis of areas falling under the 4 phases. Four different rates be fixed for four phases.

Last but not the least, the disconnection procedure of services be followed with 21 days notice in written/mail to service provider, issue of public notice in news papers which has to be mentioned in the inter connect agreements, underline scrolling of the channel to be disconnected, local channel of MSO. Otherwise the arm twisting through sudden disconnection continues. Broadcasters, MSO, LCO should publish the rates of Channels offered, Set Top Box price, warranty guarantee conditions in websites where applicable or in printed format available for consumer at demand.

That Sir, this industry has been recognized as Small Scale Industry way back in 1994 owing to the contribution & role of independent small entrepreneurs scattered all over India as Cable Operators. Hence it shall be highly appreciated, if above fact is brought into consideration while finalizing the 8th Tariff Order on Addressable Systems, Broadcasting & Cable Services.

Soliciting your kind cooperation

Thanking you
Yours truly
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