

Dear Sir,

Please find the attached table for comments regarding Mandatory DAS Audit as per regulation 15(1).

S no	Page number of the existing Audit Manual	Clause number of the existing Audit Manual	Do you agree with the amendment proposed in this CP (Yes/No)	If you do not agree with the amendment proposed in this CP, then provide amended Clause proposed by you	Reasons with full justification of your response
1	Page No. 41	15(1)	Regulation Should Be Removed	Regulation Should Be Removed	Provision of regulation 15(1) should be removed as there should not be requirement of regulation as if both broadcaster and distributor both are satisfied with given report.
2	Page No. 41	15(1)	Yes		No, There should not be any requirement of audit for small DPO'S as less number of DPO'S are left in our country due to these regulations. A. A distributor whose subscriber base is less than 10,000 should not required to do audit. B. Last financial year as subscriber base is decreasing day by

					<p>day.</p> <p>C. No, we provide service only through MSO platform.</p> <p>But from our opinion combined subscriber base of such distributor should be taken into consideration.</p> <p>ii. DPO's working on district levels should be waived off from 15(1).</p> <p>2. NO, Broadcaster should not be permitted to cause audit of systems of such DPO'S . As if broadcaster donot accept the audit done by DPO's through TRAI Empanelled Auditor then how could DPO's will accept the audit cause by broadcaster , this will lead to legal conflicts between Broadcaster and DPO's.</p> <p>A. No, Small DPO's should be exempted from manadatory audit.</p>
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3	PageNo.43	15(1)	No	15(1) Should Be Removed	As from our opinion we are the DPO who have less Subscriber base and are working on district level, so we should waived off from causing audit under the regulation 15(1).
4	PageNo.43	15(1)	No	15(1) Should Be Removed	As per our view small DPO's should be exempted from 15(1). As

					per regulations of TRAI, DPO's Should cause audit by TRAI empanelled auditor, if broadcaster don't accept audit report caused by TRAI Empanelled auditor, then how will DPO's will accept audit report caused by broadcasters under 15(2). This will lead to legal conflicts and moreover less of Connectivity to DPO'S.
5	PageNo.43-44	15(1)	No	15(1) Should Be Removed	Small DPO's should be waived off from causing audit under regulation 15(1). No, Broadcaster should not permit to cause audit under (regulation 15(2)). As if broadcaster don't accept audit report caused by TRAI Empanelled auditor, then how will DPO's will accept audit report caused by broadcasters under 15(2). This will lead to legal conflicts.
6	PageNo.46	Clause D-14			Yes, I agree with the statement.
7	PageNo.46-47		No	Few Changes Need To made	No, the specification of the logos of both infrastructure provider and infrastructure seeker distributors need to be regulated. But to ensure quality of video Signal at the subscriber end and to stop piracy through watermarking logo few regulations should be made that: 1. Logo size should not be greater than 1080P. 2. Logo should be clearly

					visible. 3. More than one logo of DPO's and more than one logo of broadcaster should not be visible on TV Screen.
8	PageNo.47	Clause C-14	Yes	-	Yes, i agree with the statement.
9	PageNo.48	Clause C-14	No	-	No, a broadcaster should not be permitted to cause the complete technical audit of all DPO's as such this will leads to legal conflict between broadcaster and DPO's.
10	PageNo.49	Clause C-14	No	-	a broadcaster should not be allowed to cause audit of all the DPO's to ensure that monthly subscription reports are completely correct as Small DPO's should be waived off from causing audit under regulation 15(1).
11	PageNo.48	Clause C-14	No	-	a broadcaster should not be able to see data of another broadcaster as each broadcaster have different deals with DPO's.
12	PageNo.48	Clause 4.5	No	-	Small DPO's Should be waived off from all types of Audit.
13	PageNo.49	Clause C-5.3,5.4	No Change	-	Clause 5.3 and clause 5.4 not need to be regulated.

Please Note:

As through when these regulation were implemented for DPO'S a slow poison was given to all DPO's from regulatory body due to hold of JIO, as JIO is offering 2 TV Screen of pay Channels in single Broadband Plans Plus Live channel on another screen, no one asked JIO how that company provides multiple TV screen of pay channel in single plan, as everyone wants that JIO should Hold in whole country and especially small Independent MSO's business get rid off/DIE.

Thanks & Regards,
Rajkumar Agarwal,
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DAS license no- 9/307/2015-DAS

