

Comments on Draft regulation of TRAI on “STANDARDS OF QUALITY OF SERVICE (DIGITAL ADDRESSABLE CABLE TV SYSTEMS)(AMENDMENT) REGULATIONS, 2014”

- 1 Whether any Public awareness campaign had been organised on regular interval by MSO/LCO under the supervision of TRAI. Even before putting this draft regulation on TRAI website, it emerge that no meeting / workshop organised by TRAI with any consumer or consumer groups as done in case of service providers (MSO/LCO) as recorded in explanatory memorandum of this draft regulation. Further, the output of the meeting with MSO/LCO and other service providers from the industry as well as minutes of the meeting with agenda of meeting not attached as annexure with draft regulation for transparency purpose and to seek comments further at consumer ends.
- 2 In Principal regulation only in single sub-regulation provision have been substituted as under in draft regulation :
“(5) The multi-system operator, either directly or through its linked local cable operator, shall issue a proper receipt for every payment made by a subscriber and the details of the receipt such as date and serial number of the receipt; amount paid by the subscriber etc. shall be entered into the subscriber management system of the multi-system operator against the name of the subscriber, within three days of the payment made by a subscriber.”

However, principal regulations the Standards of Quality of Service (Digital Addressable Cable TV Systems) Regulations, 2012, laying down, amongst other quality of service (QoS) norms, the norms for billing of subscribers of Digital Addressable Cable TV Systems (DAS) and other various provisions such as connection, disconnection, reconnection, transfer and shifting of cable tv services, manual of practice, change in the composition of subscription package, a la carte rates of tv channels , QoS for Set Top Box and subscription management system issues, non functioning of website of MSOs, Non compliance of Tech. Standards, time limit for redressal of complaints, billing related complaints etc. have not been incorporated/added in the draft regulations for the purpose of imposing financial disincentives to improve the Quality of Services and for the purpose of redressal of consumer complaints.

- 3 In principal regulation explanatory memorandum, it is mentioned that on the issue of introduction of pre-paid billing model along with existing post-paid billing model in the Digital Addressable Cable TV Systems majority of stakeholders have suggested that pre-

paid billing should be introduced similar to that of the DTH as it has been quite successful billing model across many sectors and such an option should certainly be introduced.

However, in draft regulation instead of issuing / providing proper billing to the consumers in accordance with principal regulation provisions, it is mentioned that all the multi-system operator, either directly or through its linked local cable operator, shall issue a proper receipt for every payment made by a subscriber.

It is requested that TRAI should have to incorporate all the provisions of the QoS regulations for the purpose of imposing financial incentives in accordance with the provisions of the TRAI Act, 1997. Restricting the financial disincentive only on proper receipts (instead of proper billing) to consumers not fulfil the real purpose to improve the Quality of Service at MSO/LCO level in the interest of consumers.