

**BY RPAD/EMAIL****To,**

Date- 30-05-2022

Mr. Anil Kumar Bhardwaj,

Advisor (B&CS),

Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhavan, Jawaharlal Nehru Marg,

Old Minto Road, New Delhi-110002

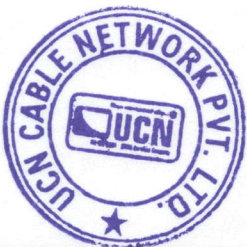
Reference- Consultation Paper on issues related to New Regulatory Framework for
Broadcasting and Cable services dated 07-05-2022

Subject- Written Comments on issues related to New Regulatory Framework for
Broadcasting and Cable services

Sir,

At the outset, being member of All India Digital Cable Federation (AIDCF), we have already filed our written comments through AIDCF on the draft consultation on tariff related issues and we are in line and in consonance with those comments. However, in addition to it we are submitting some more comments which are as follows:

1. As per twin condition (Average Test) contained in the proviso to clause (3)(b) of The Telecommunication (Broadcasting And Cable) Services (Eighth) (Addressable Systems) Tariff (Second Amendment) Order, 2020, "Provided further that maximum

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retail price per month of such bouquet and maximum retail price per month of a-la-carte pay channels forming part of that bouquet shall be subject to following conditions, namely: - (a) the sum of maximum retail prices per month of the a-la-carte pay channels forming part of a bouquet shall in no case exceed one and half times of the maximum retail price per month of such bouquet; and 3 (b) the maximum retail price per month of any a-la-carte pay channel, forming part of such a bouquet, shall in no case exceed three times the average maximum retail price per month of a pay channel of that bouquet". This proposed provision shall be consumer friendly it shall not be burdensome for the consumer to pay unnecessary extra fee and hence we are in support of this proposed amendment.

2. Apart from this, one more suggestion is to make model or uniform RIO Agreements for execution between broadcasters and DPO likewise the authority has already implemented Model Interconnection Agreement (MIA) between DPO and LCO as the broadcasters used to drafted more favourable clauses for them and usually reluctant to edit the same. Hence, to protect the interest of DPO, please provide the uniform RIO Interconnection Agreement between Broadcaster and DPO except the pricing clauses which will be variable as per their respective MRP.

Under the circumstances for ease of doing business and for effective implementation and orderly growth of the sector, we submit our aforesaid suggestions by way these written comments which should be seriously considered by the regulator.

Head Legal

(Adv Sandip Joshi)

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