



18th September 2017

Prof. M. Kasim,

Advisor (B & CS-III)

Telecom Regulatory Authority of India Mahanagar
Doorsanchar Bhawan,

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Ref: Consultation Paper on 'Ease of Doing Business in Broadcasting Sector' issued on
31.07.2017.

Sub: Counter Comments of the above referred Consultation Paper

Dear Sir,

Thumbs up for entire TRAI team to provide a chance to consult all issues on "Ease Of Doing Business" Consultation Paper. After reading all consultation papers , we are providing counter comments on some issues *like*

7. Service being run by around 60000 cable operators, who are not service management literate, need spoon feeding.

16. Today, people have capacity to pay but they want to value the service. Unfortunately, the chain ends at Subscriber interfacing with Cable TV technician (popularly called CABLE WALA) who is deemed to be a CABLE TV SERVICES AMBASSADOR. It is this entity which is expected to impress the subscriber and highlight the QoE(Quality of Experience).

By Lt Col VC Khare (Veteran) Cable TV Industry Observer



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A reading of consultation papers shows that issues framed are best for cable TV industry our counter comments are attached with Annexure 1

With Regards

For VYOM DIGITAL SERVICES PVT. LTD.

Kapil Kumar Parashar
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Director

Director

Vyom Digital Services Private Limited

Annexure 1

- Learning programmes for JV's, LCO's , and MSO's are available with different levels.
- Government had taken various QoS audits but main issue is to monitoring on regular bases.
- Now in Metro cities good JV' s and Distributors has applied billing process via card swapping machines and bills are also provided to the customers in some areas.
- Ala Carte facility is used by the customers in cable TV and all LCO's are trained to adopt this technology with mobile app.
- Now LCO is not illiterate in metro's and other remote areas as I have monitored in my last 11 year LCO learning programs in INDIA.
- The real fact of today is not to provide basics of cable TV to LCO's but different levels of training programs will be provided according to their knowledge check.
- Sir we have left an important issue of life cycle management of set top boxes and waste management.
- We have left our B2B customers who is the pivot role in the Cable TV Industry. An MSO have two type of customers first Primary(His Own) and Secondary(B2B) like Joint Ventures and Distributors.



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- The Cable TV is mainly depend upon distributors ,JV's than LCO's.
- A LCO is mostly depends upon JV's and Distributors.
- A good JV and Distributers approach reflects upon LCO network.
- Learning and training programs should be different for Distributers and LCO's.
- Now mostly LCO's are using latest CRM technology for fund transfer, billing and inventory management.
- Now in METRO cities cable operator is not as illiterate as described now he is providing multi services Cable & Broadband.

Do let us know if there is any further clarification needed, we shall be pleased to provide the same

