

## FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

(Regd.)

Promoted exclusively to deal with pressing issues .....

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Tiruchirappalli – 620 010

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The Telecom Regulatory Authority of India,

1<sup>st</sup>, March, 2016

**New Delhi**

Sir,

Sub: forward our view on consultation paper in the issue of “Tariff Issues related to TV Services” dated: 29.01.2016 – reg:

At outset; we express our sincere thanks and appreciation for seeking opinion/view among the consumers in this issue. We submits the following as our view for your kind consideration in generally, the end users may not be exploiting by the service providers, so the control on the service providers will remain with TRAI for review then and there.

The end users may allow to select their pay channels instead of availing group of channels; most of them not require to them and are in position to pay. This may also will be taken for consideration.

We please forward our view on the above consultation paper for your kind consideration in item wise.:

### **Issues for consultation:**

**Q1. Which of the price models discussed in consultation paper would be suitable at wholesale level in broadcasting sector and why? You may also suggest a modified/ alternate model with detailed justifications.**

**Our view:** Exclusive a-la-carte model is preferable. The customer can choose the channels of his choice without unnecessarily shelling out money on unwanted channels. During cricket matches he can opt for sport channel. During children’s exam times they can omit cartoon channels and opt for educational channels.

**Q2. Which of the corresponding price models discussed in consultation paper would be suitable at retail level in broadcasting sector and why? You may also suggest a modified/ alternate model with detailed justifications.**

**Our view:** Regulator declares a Maximum Retail Price (MRP) for each channel for the consumer either on genre basis or for all channels, which is uniform across all platforms

**Q3. How will the transparency and non-discrimination requirements be fulfilled in the suggested pair of models? Explain the methodology of functioning with adequate justification.**

**Our view:** Because regulatory level is high. The broadcaster can't be lax. \Transparency has to be followed.

**Q4. How will the consumers interests like choice of channels and budgeting their expenses would be protected in the suggested pair of models? Give your comments with detailed justifications.**

**Our view :** Same as answer to Q.1.

**Q5. Which of the integrated distribution models discussed in consultation paper would be suitable and why? You may also suggest a modified/ alternate model with detailed justifications.**

**Our view:** IPTV and Cable networks are bidirectional capable. Due to bidirectional nature of these networks, these can be used to transmit other kinds of data also in either unicast, multicast or broadcast mode. Therefore for these networks, the network usage charges, depending upon the bandwidth used by the channels subscribed by the subscribers, could be independent of pay channel charges.

**Q6. How will the transparency and non-discrimination requirements be fulfilled in the suggested models? Explain the methodology of functioning with adequate justification.**

**Our view:**

a. This model may also be consumer friendly as competition at broadcast as well as distribution level will reduce the effective price to subscribers.

b. Interests of the broadcasters and DPOs are not in conflict resulting into reduced litigations.

c. It provides flexibility to broadcasters to price their channels within the prescribed regulatory framework.

d. It may also improve diversity and quality of content.

e. DPOs would be at liberty to market FTA channels and platform services.

f. Provides full freedom to customers to choose the channels and bouquets of the channels of its choice.

- g. Provides stand alone viable model for distribution platform operators and LCOs to improve its network infrastructure. This will further improve the quality of the services and capacity of network.
- h. It will ensure the reasonable rate of return to investors of broadcasters and distributors. In turn it may help in attracting investment in the sector.
- i. Ensures a level playing field amongst various stakeholders in the value chain.
- j. It protects the interests of consumers.
- k. Encourages the broadcasters to offer niche channels.
- l. Enables price discovery of a category of channels based on competitive market principles.
- m. Increase in investment may bring more direct/ indirect employment.

**Q7. How will the consumers interests like choice of channels and budgeting their expenses would be protected in the suggested integrated distribution models? Give your comments with detailed justifications.**

**Our view:**

- a. The Customer habit for the selection of channels is presently for choosing a large bouquet. However, in this model, emphasis has been given on smaller bouquets and a-la-carte channels. Therefore, awareness of customer becomes important for success of this model.
- b. Ensuring realistic network infrastructure cost for growth of DPOs while protecting the interest of the consumers.
- c. Ensuring reasonable content pricing at retail level by the broadcasters.
- d. Proper framework for selecting the channels of choice by consumers.

Thanks and regards.

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