

To,
Mr. Sanjeet Singh
Advisor (B & CS),
Telecom Regulatory Authority of India,
New Delhi.

14th October, 2015.

Subj: Comments on the draft Telecommunication (Broadcasting and Cable) Services (Fourth) (Addressable Systems) Tariff (Amendment) Order 2015, issued on 30th September 2015

Dear Sir,

This has reference to the above captioned draft Tariff Order released by the Hon. Authority on 30th September, 2015.

That the Tariff (Amendment) Order dated 20th September 2013, was impugned by one of the DTH operator before TDSAT and this Authority has rightly upon consideration of the contentions, problems and objections to previous twin conditions laid under the previous Tariff Order/s and accordingly the Authority on its own acquiesced to keep the said Tariff Order in abeyance.

Though it is stated the intention of the Authority is to ensure availability of an effective choice to the consumers allowing them to subscribe to their desired channels on an a-la-carte basis at reasonable price, without taking away any flexibility on the part of the platform operators, to price the channels individually and as a bouquet in a manner to suit their business plans, yet we are at pain to again point out and bring in notice of Hon'ble Authority that even in proposed draft Tariff Order the earlier concerns raised by us remain unaddressed as explained hereinafter:

Snapshot of the Concerns:

1. Need to first Regulate Wholesale Tariff (RIO Rates of both SD & HD Channels):

Before regulating the a-la-carte price offered to customer, which are derived from the RIO rate of the SD Channels and HD Channels offered by the Broadcaster, the Authority should first regulate the RIO rates for both format of Channels. It should be appreciated that to offer a channel

a-la-carte to subscriber by DTH operator, if DTH operator gets the channel at reasonable RIO rate from the broadcaster then there is no need to introduce the twin conditions. In any case, the customer would get channel, a-la-carte at very reasonable price. The Authority is aware that the broadcasters now a days almost stopped offering channels in bouquet at wholesale level and on other hand the RIO price of a channel is exponentially high. It is therefore the need of the hour to first regulate the RIO rates of both SD and HD Channels and arrive at correct wholesale pricing before regulating the a-la-carte pricing of the platform operators through twin conditions.

Additionally, we would like to present the fact that the actual deals between broadcasters and distribution platforms take place at about 10-20% of the published RIO rates. The published RIO rates are often used as means to arm-twist the distribution platforms from going RIO and to dissuade the end consumer from being able to make a-la-carte choices as per his/her preferences.

Thus, it is necessary that the RIO rates of the broadcasters for both SD and HD Channels should be first streamlined and then turn to regulating the rates offered by platform operators. Unless such exercise is first carried out and TRAI comes up with fresh tariff order on fixation of wholesale rates of broadcaster, it would be a prejudicial exercise to regulate and fix the retail tariff of the platform operators. That the offering of channels and bouquets by distribution platforms to their subscribers is highly subsidized and in the interests of the subscribers, implementing the proposed twin condition under the captioned Tariff Order would compel the distribution platforms to increase the existing a-la-carte and bouquet prices which would then be unaffordable to consumers at large. As such we request to the Authority that, the retail tariff rates should be left to market forces and should continue to be under forbearance as before.

2. Need to first regulate HD Wholesale Pricing to achieve object of the proposed Tariff Order

Presently the rates of HD Channels offered by Broadcaster to distribution platform are unregulated, the HD Channel RIO price ranges from Rs. 16/- to Rs. 141/-. If any bouquet comprising HD channels and / or SD channel is offered to the subscriber, then due to non-regulation of HD wholesale

tariff, the implementation of twin condition in such bouquet will invariably lead to huge loss to the operator. It would be unjust to force DTH operator to price HD channel at disproportionately lesser price than the wholesale price.

Thus, in the present scenario, HD channel pricing is entirely unregulated. Broadcasters are free to ascribe any RIO rate to HD channels and change the same at any time as per their whims and fancies. The HD RIO rates of the channels are specified in **Annexure A**.

It is important to note that the Authority though has preferred to forbear from regulating wholesale tariff of HD channels, yet it has not differentiated between HD pay channel and SD pay channels in the proposed Tariff Order, which is unjust, more so because the content on both the channels are same. The comparison between SD Channel RIO rates and HD Channels RIO rates is specified in **Annexure B**.

Beside this, the chart enclosed as **Annexure C** and explained hereinafter would show that the operator ends up pricing the a-la-carte rate of HD channels lesser than RIO rate offered by the broadcaster for the same HD channel. The implementation of the formula is yet complicated and is difficult to implement at the ground level. It will force the operators to offer channels below the RIO rates. A-la-carte is stipulated by the DTH operator and it cannot be below its cost.

3. Twin Conditions force platform operators to price SD Channels below RIO rates:

The formula for deriving ala-carte value is based on wrong assumptions. The assumed maximum discount of 66.66% is without any basis/ analysis, particularly it is known fact that at the wholesale level the discount passed in fixed fee deals with package compulsion is around 85% to 95% to the RIO rates which are nothing but wholesale a-la-carte offering. The formula for deriving ala-carte value is based on wrong assumptions.

4. Flaw in twin condition: Condition (a):

As per condition (a) of the proposed Twin Condition, offering of Channels at retail level at twice the RIO rate would not be of any help in absence of true and correct fixation of RIO price published by broadcasters for

both SD and HD Channels. If RIO rate is correctly priced by broadcaster, then there would be no necessity for such tariff order as retail a-la-carte rate would become affordable to the consumer vi-a-vis the bouquet rate.

Condition (b):

Similarly, as per condition (b) of the Twin Conditions, offering of bouquet of Channels three times the total a-la-carte price of the channels offer in such bouquet, would have the following impact:

- (i) The Bouquet price would increase substantially, since it is linked to the sum of a-la-carte price of all the channels in that bouquet.

As illustrated in annexed **Annexure D**

- (ii) Platform Operators would be forced to reduce the number of channels in the bouquet, in order to align the bouquet price with the proposed twin conditions.

As illustrated in annexed **Annexure E**

Twin Conditions makes offering of HD channels as part of bouquet, infeasible and impractical.

This is illustrated in the attached **Annexure F**

Additionally, if any channel is added to the platform, then the platform operator is forced to re-caliber the bouquet rates.

This is illustrated in the attached **Annexure G**

5. Loss of Flexibility to change the composition of packs:

The tariff order will take away all the flexibility of DTH operator with respect to the packaging of the channels. The addressable platforms would be forced to package the channels in such a manner where the package has less number of pay channels, less number of FTA channels with increase in the price of the package. The channels are added in particular existing bouquet as per genre of the channel. As such if DTH operator wants to add any new launched channel in particular existing bouquet then same will force it to re-shuffle the a-la-carte price of all

channels comprising in bouquet and may lead in depriving its flexibility as per business need, thus defeating the very intention of the Authority.

Thus, the Authority's objective to provide DTH operators flexibility with regard to pricing and packaging their offerings at the retail level, will not be achieved if the proposed twin condition is implemented

6. Possible breach of existing / future agreements with Broadcasters:

DTH operators get the channels from the broadcasters on 3 different terms – (i) RIO basis (ii)CPS basis and (iii)Fixed fee basis. If DTH operators offer the channels on a-la-carte basis, the DTH operators would not get the channels on Fixed fee/CPS basis from the broadcaster. If some of the DTH operators have fixed fees agreements then it has mandate to offer maximum numbers of channels in entry package, which packages cannot be altered under the agreement. In case of implementation of proposed Twin Condition, the DTH operator necessarily will have to make small bouquets with less channels and cannot be in compliance of promised packaging obligation to the broadcasters. As such a DTH operator may come in breach of the existing/future agreements.

7. Non-viable business proposition:

The Authority is aware that despite implementation of DAS in some part of the country, the competitors such as LCOs in most of the cities do not offer any package, bouquets but offer all the channels on the platform in bulk bouquet to the subscribers without any choice. If due to implementation of twin conditions, DTH operator forced to create bouquet with lesser number of channels then it would cause to great prejudice to DTH operators.

Authority's presumption that the price of bouquet should be derived from a-la-carte price of channels is grossly misconceived, illogical and irrational in nature.

The Authority needs to appreciate the fact that there exist a vast difference of Broadcaster offering their channels in bouquet to platform operators vis-à-vis platform operator offering channels to its subscribers. A platform operator while deciding composition of retail packages need

to consider various consideration in mind which is not only limited to a-la-carte price of a particular nature.

Also, if the proposed twin condition is being brought in vogue then the platform operator would be forced to create the packaging keeping in mind the price of a channel and not the genre of the channel. Thus, the platform operators would be forced to move out the high value of channels which are presently made available to many customers as part of their existing bouquet.

Also it is pertinent to mention at this juncture the rate of pay channels are fixed by the Broadcasters and any change in price of a channel by broadcaster or due to change in regulatory regime for wholesale tariff would force DTH operators to recalibrate all its subscription packs and bouquet

8. Conflicting Regulatory Mandates:

Proposed Twin condition forces to recalibrate both in prices and composition of bouquet. However, Quality of Service Regulation prohibits the operators to make the changes in the price or composition of subscribed channels during first six months of the date of enrolment. Resultantly, there would be a scenario where one regulation would be complied at the cost of non-compliance of another regulation. From this view point also the proposed tariff regulation is unsustainable and impractical.

In the backdrop of the above, we suggest:

- 1. Wholesale RIO rate should be regulated and correctly priced.**
- 2. SD channel RIO rate and HD channel RIO rates be linked together.**
- 3. The twin conditions be dispensed with.**
- 4. We may be given an opportunity of hearing to further elaborate our aforesaid facts/views.**
- 5. Regulation on Retail Tariff should be continued to be forborne.**

Thanking you
for Videocon d2h Limited,


Shivendra Krishna Singh
Head-Regulatory & Compliance

Annexure A
The HD RIO rates of the channels

| Channels | HD RIO (Net of all applicable taxes) |
|-----------------------------|---|
| Star Plus | 30.00 |
| Zee TV | 30.00 |
| Colors | 50.00 |
| Life Ok | 30.00 |
| Sony Entertainment TV | 40.00 |
| AXN | 30.00 |
| Star World | 20.00 |
| Colors Infinity | 40.00 |
| Zee Cinema | 30.00 |
| Star Gold | 30.00 |
| &pictures | 30.00 |
| Star Movies | 30.00 |
| PIX | 30.00 |
| Zee Studio | 30.00 |
| Movies Now | 30.00 |
| CNBC TV18 | 40.00 |
| Star Sports 1 | 119.90 |
| Star Sports 2 | 141.80 |
| Star Sports 3 | 50.00 |
| Star Sports 4 | 50.00 |
| Ten Sports | 125.00 |
| Sony Six | 100.00 |
| Discovery | 24.15 |
| History | 35.00 |
| National Geographic Channel | 16.00 |
| National Geographic Wild | 30.00 |
| Fox Life | 30.00 |
| TLC | 24.15 |
| MTV Indies | 50.00 |
| M Tunes | 0.00 |
| Sun TV | 40.00 |
| KTV | 40.00 |
| Sun Music | 25.00 |
| Gemini TV | 40.00 |
| Travel XP HD | 31.00 |
| Star Movies Select HD | 30.00 |
| Total | 1522.00 |

Annexure B
Chart Showing Comparison of SD and HD rate Comparison

| Sr. No. | Channels | SD RIO Rate per subscriber per month (In Rs.) | HD RIO Rate per subscriber per month (In Rs.) | Difference (In Rs.) | Ratio/ Times |
|---------|-----------------------|---|---|---------------------|--------------|
| 1 | Star Plus | 7.87 | 30.00 | 22.13 | 3.81 |
| 2 | Zee TV | 5.83 | 30.00 | 24.17 | 5.15 |
| 3 | Colors | 8.99 | 50.00 | 41.01 | 5.56 |
| 4 | Life Ok | 9.21 | 30.00 | 20.79 | 3.26 |
| 5 | Sony Entertainment TV | 8.99 | 40.00 | 31.01 | 4.45 |
| 6 | AXN | 6.52 | 30.00 | 23.48 | 4.60 |
| 7 | Star World | 2.05 | 20.00 | 17.95 | 9.78 |
| 8 | Colors Infinity | 8.32 | 40.00 | 31.68 | 4.81 |
| 9 | Zee Cinema | 5.83 | 30.00 | 24.17 | 5.15 |
| 10 | Star Gold | 7.42 | 30.00 | 22.58 | 4.04 |
| 11 | &pictures | 7.56 | 30.00 | 22.44 | 3.97 |
| 12 | Star Movies | 7.42 | 30.00 | 22.58 | 4.04 |
| 13 | PIX | 5.39 | 30.00 | 24.61 | 5.56 |
| 14 | Zee Studio | 3.15 | 30.00 | 26.85 | 9.54 |
| 15 | Movies Now | 7.41 | 30.00 | 22.59 | 4.05 |
| 16 | CNBC TV18 | 3.82 | 40.00 | 36.18 | 10.47 |
| 17 | Star Sports 1 | 14.89 | 119.90 | 105.01 | 8.05 |
| 18 | Star Sports 2 | 15.12 | 141.80 | 126.68 | 9.38 |
| 19 | Star Sports 3 | 12.58 | 50.00 | 37.42 | 3.97 |
| 20 | Star Sports 4 | 14.89 | 50.00 | 35.11 | 3.36 |

| | | | | | |
|----|-----------------------------|-------|--------|--------|-------|
| 21 | Ten Sports | 6.74 | 125.00 | 118.26 | 18.54 |
| 22 | Sony Six | 14.70 | 100.00 | 85.30 | 6.80 |
| 23 | Discovery | 7.75 | 24.15 | 16.40 | 3.12 |
| 24 | History | 6.72 | 35.00 | 28.28 | 5.21 |
| 25 | National Geographic Channel | 2.58 | 16.00 | 13.42 | 6.19 |
| 26 | National Geographic Wild | 6.72 | 30.00 | 23.28 | 4.46 |
| 27 | Fox Life | 1.98 | 30.00 | 28.02 | 15.15 |
| 28 | TLC | 4.65 | 24.15 | 19.50 | 5.19 |
| 29 | MTV Indies | 4.02 | 50.00 | 45.98 | 12.44 |
| 30 | M Tunes | 0.00 | 0.00 | 0.00 | - |
| 31 | Sun TV | 7.11 | 40.00 | 32.89 | 5.63 |
| 32 | KTV | 8.61 | 40.00 | 31.39 | 4.65 |
| 33 | Sun Music | 4.02 | 25.00 | 20.98 | 6.22 |
| 34 | Gemini TV | 5.91 | 40.00 | 34.09 | 6.77 |

* Above mentioned rates are net of all applicable taxes.

Annexure C

Working to show effect on Retail Rates of HD channels vis-vis RIO Rates of HD Channels

The below-working is arrived at basis the total number of HD channels in Platinum HD pack

| Channel Name | RIO Rate* | Reduced A-la-Carte due to Twin Condition* |
|-----------------------|-----------|---|
| &Pictures HD | 30.00 | 6.93 |
| AXN HD | 30.00 | 6.93 |
| CNBC TV18 Prime HD | 40.00 | 9.25 |
| Colors HD | 50.00 | 11.56 |
| Colors Infinity HD | 40.00 | 9.25 |
| Discovery HD | 24.15 | 5.58 |
| Fox Life HD | 30.00 | 6.93 |
| History HD | 35.00 | 8.09 |
| Life Ok HD | 30.00 | 6.93 |
| M Tunes HD | 0.00 | 0.00 |
| MN+ HD | 30.00 | 6.93 |
| MTV Indies HD | 50.00 | 11.56 |
| NGC HD | 16.00 | 3.70 |
| NGC WILD HD | 30.00 | 6.93 |
| PIX HD | 30.00 | 6.93 |
| Six HD | 100.00 | 23.12 |
| Sony HD | 40.00 | 9.25 |
| Star Gold HD | 30.00 | 6.93 |
| Star Movies HD | 30.00 | 6.93 |
| Star Movies Select HD | 30.00 | 6.93 |
| Star Plus HD | 30.00 | 6.93 |
| Star Sports HD1 | 119.90 | 27.72 |
| Star Sports HD2 | 141.80 | 32.78 |
| Star Sports HD3 | 50.00 | 11.56 |
| Star Sports HD4 | 50.00 | 11.56 |
| Star World HD | 20.00 | 4.62 |
| Ten HD | 125.00 | 28.89 |
| TLC HD | 24.15 | 5.58 |
| Travel XP HD | 31.00 | 7.17 |
| Zee Cinema HD | 30.00 | 6.93 |
| Zee Studio HD | 30.00 | 6.93 |
| Zee TV HD | 30.00 | 6.93 |

*Above mentioned rates are net of all applicable taxes.

Annexure D
Increase in Bouquet prices due to the proposed twin condition

| Pack | Pack Price | No. of Pay Channels | No. of FTA Channels | Sum of RIO Rates (input cost) of PAY Channels | Sum of A-la-carte Rates of FTA Channels | Total A-la-Carte = 2 x RIO Rate + FTA A-la-carte Rate | Revised Pack Price to meet twin Cond. |
|---------------------|------------|---------------------|---------------------|---|---|---|---------------------------------------|
| ROI Gold | 222 | 102 | 157 | 553 | 357 | 1,463 | 488 |
| ROI Gold Maxi | 247 | 105 | 157 | 586 | 357 | 1,528 | 509 |
| ROI Gold Sports | 298 | 115 | 157 | 722 | 357 | 1,801 | 600 |
| ROI Diamond | 351 | 148 | 163 | 874 | 372 | 2,119 | 706 |
| ROI Platinum | 404 | 153 | 163 | 903 | 372 | 2,178 | 726 |
| ROI Platinum HD | 531 | 184 | 164 | 2,280 | 374 | 4,934 | 1,645 |
| Flexi Pack Tamil | 126 | 18 | 142 | 86 | 319 | 492 | 164 |
| South Silver | 177 | 91 | 138 | 485 | 309 | 1,280 | 427 |
| South Silver Maxi | 204 | 93 | 138 | 513 | 309 | 1,335 | 445 |
| South Silver Sports | 230 | 99 | 138 | 594 | 309 | 1,498 | 499 |
| South Gold | 222 | 145 | 165 | 777 | 377 | 1,931 | 644 |
| South Gold Maxi | 256 | 147 | 165 | 805 | 377 | 1,987 | 662 |
| South Gold Sports | 298 | 157 | 165 | 945 | 377 | 2,266 | 755 |
| South Diamond | 351 | 178 | 166 | 1,060 | 379 | 2,500 | 833 |
| South Platinum | 404 | 183 | 166 | 1,090 | 379 | 2,559 | 853 |
| South Platinum HD | 531 | 218 | 167 | 2,612 | 382 | 5,605 | 1,868 |

* Above mentioned rates are net of all applicable taxes.

Annexure E

Reduction in number of channel to meet the twin condition, by taking an example of d2h super Gold Pack

Total Channels in Super Gold Pack: 259

To comply with the twin condition, 147 channels need to be dropped from the Super Gold Pack. A revised package after dropping 147 channels, is captured below:

| Package Name | Pay/FTA | D2H Super GOLD | RIO | Proposed A-la-Carte |
|-----------------------|---------|----------------|--------|---------------------|
| Price | | 222 | 267.81 | 664.63 |
| Count of Channels | | 112 | | |
| | | | | |
| Star Plus | Pay | ✓ | 7.87 | 15.73 |
| Zee TV | Pay | ✓ | 5.83 | 11.66 |
| Star Utsav | FTA | ✓ | 0.00 | 2.50 |
| Zee Anmol | FTA | ✓ | 0.00 | 2.50 |
| Sony Entertainment TV | Pay | ✓ | 8.99 | 17.98 |
| SAB | Pay | ✓ | 6.17 | 12.35 |
| Colors | Pay | ✓ | 8.99 | 17.98 |
| Rishtey | FTA | ✓ | 0.00 | 2.50 |
| Sahara One | Pay | ✓ | 10.25 | 20.50 |
| Dangal | FTA | ✓ | 0.00 | 2.50 |
| DD1 | FTA | ✓ | 0.00 | 1.00 |
| Bindass | Pay | ✓ | 4.83 | 9.66 |
| Channel V | Pay | ✓ | 0.45 | 0.90 |
| DD India | FTA | ✓ | 0.00 | 1.00 |
| | | 14 | | |
| | | | | |
| Zee Cinema | Pay | ✓ | 5.83 | 11.66 |
| Star Gold | Pay | ✓ | 7.42 | 14.84 |
| MAX | Pay | ✓ | 7.64 | 15.28 |
| UTV Movies | Pay | ✓ | 7.25 | 14.50 |
| Maha Movies | FTA | ✓ | 0.00 | 2.50 |
| Cinema TV | FTA | ✓ | 0.00 | 2.50 |
| Enterr10 Movies | FTA | ✓ | 0.00 | 2.50 |

| | | | | |
|-----------------------------|-----|-----------|-------|-------|
| | | 7 | | |
| | | | | |
| ABP News | FTA | ✓ | 0.00 | 2.50 |
| Zee business | Pay | ✓ | 2.16 | 4.32 |
| Zee News | Pay | ✓ | 3.37 | 6.74 |
| Aaj Tak | Pay | ✓ | 3.15 | 6.29 |
| CNBC AWAAZ | Pay | ✓ | 2.02 | 4.05 |
| IBN 7 | Pay | ✓ | 3.15 | 6.29 |
| NDTV India | Pay | ✓ | 3.37 | 6.74 |
| DD Loksabha | FTA | ✓ | 0.00 | 1.00 |
| DD News | FTA | ✓ | 0.00 | 1.00 |
| DD Rajyasabha | FTA | ✓ | 0.00 | 1.00 |
| India .TV | FTA | ✓ | 0.00 | 2.50 |
| | | 11 | | |
| | | | | |
| Sony Mix | Pay | ✓ | 3.15 | 6.30 |
| MTV | Pay | ✓ | 3.15 | 6.29 |
| UTV Stars/ Bindaas Play | Pay | ✓ | 8.57 | 17.14 |
| M Tunes | FTA | ✓ | 0.00 | 2.50 |
| Mastiii | FTA | ✓ | 0.00 | 2.50 |
| Music India | FTA | ✓ | 0.00 | 2.50 |
| 9X M | Pay | ✓ | 2.94 | 5.88 |
| 9x Jalwa | Pay | ✓ | 2.10 | 4.20 |
| B4U Music | FTA | ✓ | 0.00 | 2.50 |
| | | 9 | | |
| | | | | |
| Russia Today | FTA | ✓ | 0.00 | 2.50 |
| | | 1 | | |
| | | | | |
| DD Sports | FTA | ✓ | 0.00 | 1.00 |
| | | 1 | | |
| | | | | |
| Cartoon Network | Pay | ✓ | 5.62 | 11.23 |
| Zee Q | Pay | ✓ | 42.00 | 84.00 |
| Nickelodeon | Pay | ✓ | 2.70 | 5.39 |
| Sonic | Pay | ✓ | 5.46 | 10.92 |
| Nick Jr. - Teen Nick | Pay | ✓ | 5.62 | 11.23 |
| | | 5 | | |
| | | | | |
| National Geographic Channel | Pay | ✓ | 2.58 | 5.17 |
| National Geographic Wild | Pay | ✓ | 6.72 | 13.44 |

| | | | | |
|------------------------------|-----|----|-------|-------|
| Fox Life | Pay | ✓ | 1.98 | 3.96 |
| Discovery | Pay | ✓ | 7.75 | 15.50 |
| Animal Planet | Pay | ✓ | 2.59 | 5.18 |
| History | Pay | ✓ | 6.72 | 13.44 |
| Care World | FTA | ✓ | 0.00 | 2.50 |
| DD Bharati | FTA | ✓ | 0.00 | 1.00 |
| DD Kisan | FTA | ✓ | 0.00 | 1.00 |
| | | 9 | | |
| | | | | |
| Living Foodz | Pay | ✓ | 12.60 | 25.20 |
| Home Shop 18 | FTA | ✓ | 0.00 | 2.50 |
| Food Food | Pay | ✓ | 8.39 | 16.78 |
| NDTV Good Times | Pay | ✓ | 4.04 | 8.08 |
| Fashion Tv | Pay | ✓ | 0.00 | 0.00 |
| Shop CJ | FTA | ✓ | 0.00 | 2.50 |
| Gemporia | FTA | ✓ | 0.00 | 2.50 |
| Blue Naaptol | FTA | ✓ | 0.00 | 2.50 |
| Shop CJ 2 | FTA | ✓ | 0.00 | 2.50 |
| Planet M Shopping | FTA | ✓ | 0.00 | 2.50 |
| Den Snapdeal TV | FTA | ✓ | 0.00 | 2.50 |
| Best Deal TV | FTA | ✓ | 0.00 | 2.50 |
| TELEBRANDS | FTA | ✓ | 0.00 | 2.50 |
| | | 13 | | |
| | | | | |
| Aastha | FTA | ✓ | 0.00 | 2.50 |
| Sanskar | FTA | ✓ | 0.00 | 2.50 |
| Paras TV | FTA | ✓ | 0.00 | 2.50 |
| Arihant | FTA | ✓ | 0.00 | 2.50 |
| Jinvani TV | FTA | ✓ | 0.00 | 2.50 |
| Darshan24 | FTA | ✓ | 0.00 | 2.50 |
| Adhyatm Bhakti | FTA | ✓ | 0.00 | 2.50 |
| Ishwar Bhakti | FTA | ✓ | 0.00 | 2.50 |
| GOD | FTA | ✓ | 0.00 | 2.50 |
| Divya | FTA | ✓ | 0.00 | 2.50 |
| Daati Ahsas | FTA | ✓ | 0.00 | 2.50 |
| Mangal Kalash | FTA | ✓ | 0.00 | 2.50 |
| Vision Shiksha/Peace of Mind | FTA | ✓ | 0.00 | 2.50 |
| | | 13 | | |
| | | | | |
| Zee Marathi | Pay | ✓ | 3.60 | 7.19 |
| Colors Marathi | Pay | ✓ | 4.67 | 9.34 |

| | | | | |
|-------------------------|-----|----|------|-------|
| Star Pravah | Pay | ✓ | 5.04 | 10.08 |
| Mi Marathi | FTA | ✓ | 0.00 | 2.50 |
| Saam TV | FTA | ✓ | 0.00 | 2.50 |
| Maiboli | FTA | ✓ | 0.00 | 2.50 |
| Zee Talkies | Pay | ✓ | 6.96 | 13.93 |
| 9X Jhakaas | Pay | ✓ | 2.10 | 4.20 |
| ABP Majha | Pay | ✓ | 4.93 | 9.86 |
| Zee 24 Taas | Pay | ✓ | 3.82 | 7.64 |
| Sangeet Marathi | FTA | ✓ | 0.00 | 2.50 |
| IBN Lokmat | Pay | ✓ | 3.30 | 6.60 |
| TV9 Marathi | FTA | ✓ | 0.00 | 2.50 |
| DD10 Sahyadri (Marathi) | FTA | ✓ | 0.00 | 1.00 |
| | | 14 | | |
| DD7 Bangla | FTA | ✓ | 0.00 | 1.00 |
| DD Punjabi | FTA | ✓ | 0.00 | 1.00 |
| DD6 Oriya | FTA | ✓ | 0.00 | 1.00 |
| DD11 Gujarati | FTA | ✓ | 0.00 | 1.00 |
| DD Rajasthan | FTA | ✓ | 0.00 | 1.00 |
| DD Bihar | FTA | ✓ | 0.00 | 1.00 |
| DD UP | FTA | ✓ | 0.00 | 1.00 |
| DD MP | FTA | ✓ | 0.00 | 1.00 |
| DD Urdu | FTA | ✓ | 0.00 | 1.00 |
| DD12 Kashmiri | FTA | ✓ | 0.00 | 1.00 |
| DD13 North East | FTA | ✓ | 0.00 | 1.00 |
| DD5 Podhigai (Tamil) | FTA | ✓ | 0.00 | 1.00 |
| DD8 Saptagiri | FTA | ✓ | 0.00 | 1.00 |
| DD9 Chandana (Kannada) | FTA | ✓ | 0.00 | 1.00 |
| DD4 Malayalam | FTA | ✓ | 0.00 | 1.00 |

* Above mentioned rates are net of all applicable taxes.

Annexure F

Twin Conditions makes offering of HD channels as part of bouquet, infeasible and impractical.

Under ROI Platinum pack when 31 HD channels are added, then the total a-la-carte price increases from Rs. 2178 to Rs. 4934 which will result in increase in ROI Platinum HD pack price from Rs. 531/- to Rs 1645/-.

| Pack | Pack Price | No. of Pay Channels | No. of FTA Channels | Sum of RIO Rates of PAY Channels | PAY A-la-carte = 2 x RIO Rate (Cond. A) | Sum of A-la-carte Rates of FTA Channels | Total A-la-Carte = 2 x RIO Rate + FTA A-la-carte Rate | Revised Pack Price as per Twin Condition |
|-----------------|------------|---------------------|---------------------|----------------------------------|---|---|---|--|
| ROI Platinum | 404 | 153 | 163 | 903 | 1806 | 372 | 2178 | Rs. 726/- |
| ROI Platinum HD | 531 | 184 | 164 | 2280 | 4560 | 374 | 4934 | Rs.1645/- |

* Above mentioned rates are net of all applicable taxes.

Annexure G
Change in bouquet price due to addition of channels on the platform

| Pack | Pack Price | No. of Pay Channels | No. of FTA Channels | Sum of RIO Rates of PAY Channels | Sum of A-la-carte Rates of FTA Channels | Total A-la-Carte = 2 x RIO Rate + FTA A-la-carte Rate | Revised Pack Price to meet twin Cond. |
|---------------|------------|---------------------|---------------------|----------------------------------|---|---|---------------------------------------|
| ROI Gold Maxi | 247 | 105 | 157 | 586 | 357 | 1,528 | 509 |
| ROI Gold Maxi | 247 | 115 | 157 | 722 | 357 | 1,801 | 600 |

The above table shows that mere addition of 10 pay channels in ROI Gold Maxi Pack, would lead to increase in pack price from Rs. 509/- to Rs. 600/-.

* Above mentioned rates are net of all applicable taxes.