

Subject: **Fwd: Comments on Consultation Paper on Tariff Issues related to TV Services**

To: Manoj Verma <manoj@traf.gov.in>

Cc: Shreya Jain <shreya@traf.gov.in>

Date: 02/26/16 09:41 AM

From: Group Captain Umesh Kumar <umesh@traf.gov.in>

Kindly start filing soft copies against each question in a structured manner so that all comments get appropriately binned and labelled accordingly. colour coding of comments and counter comments can also be done so that the analysis becomes easier.

Shreya please start with this response as you will be deeply involved.

regards

----- Original Message -----

From: **Sunil K Gupta** <pradvbcs@traf.gov.in>

Date: Feb 25, 2016 6:07:21 PM

Subject: Fwd: Comments on Consultation Paper on Tariff Issues related to TV Services

To: umesh <umesh@traf.gov.in>

For necessary action

Sunil K Gupta
Pr. Advisor (B&CS), TRAI
Tel: 23220018

----- Forwarded Message -----

Subject: Comments on Consultation Paper on Tariff Issues related to TV Services

Date: Thu, 25 Feb 2016 15:04:34 +0530

From: CSL Infomedia <cslinfomedia@gmail.com>

To: pradvbcs@traf.gov.in

CC: umesh@traf.gov.in

Dear Sir,

This has the reference to your Consultation Paper No.: 01/2016 on on
Tariff Issues related to TV Services dated 29-Jan-2016.

Please find below our comments for Chapter-5 regarding the carriage fee:

Q31. Should the carriage fee be regulated? If yes, what should be the basis to regulate carriage fee?

There should not be any carriage fee. MSO can generate the revenue through its subscriber base. Imposing carriage fee on broadcaster is just like we are going against the net neutrality and giving power to

MSO to decide whether he wants to show the channel or not. Like in the present scenario, there are cases where MSO is not carrying the Must Carry channels and asking for bulk amount for carriage fee. Also, due to recent technology of 3G/4G, broadcasting is also available on Internet; broadcasters need not to pay any carriage fee to ISP. In broadcasting terms, MSO are playing the same role as ISP, so net neutrality should also be applicable to MSO. Nevertheless, if in any case carriage fee is imposed, it should be based on the number of subscriber with some upper limit. Like channels gets their approved rate for showing advertisements from DAVP, TRAI should also fix the carriage fee of each MSO based on their infrastructure cost. For this, TRAI can seek the required financial documents from each MSO.

Q32. Under what circumstances, carriage fee be permitted and why?

For Pay Channels, there can be some revenue sharing model between MSO and broadcaster.

Q33. Is there a need to prescribe cap on maximum carriage fee to be charged by distribution platform operators per channel per subscriber? If so, what should be the "price Cap" and how is it to be calculated?

Like channels gets their approved rate from DAVP, TRAI should also fix the carriage fee of each MSO based on their infrastructure cost. The price cap can be Rs. 1 per subscriber per annum. For example, if there are 500 minimum channels on MSO platform, and there are 10 Crore subscriber, then the expected revenue can be $500 \times 10 \text{ Crore} = 5000 \text{ Crore}$ per annum. This is a huge amount considering their investment on infrastructure.

Q34. Should the carriage fee be reduced with increase in the number of subscribers for the TV channel? If so, what should be the

criteria and
why?

It should be based on the number of subscriber with some upper limit.

Q35. Should the practice of payment of placement and marketing fees amongst stakeholders be brought under the ambit of regulation? If yes, suggest the framework and its workability?

Yes, it should be regularize. Each MSO must submit the quarterly report to TRAI for its carriage fee and the same can be verified with the concern broadcaster.

Thanks

For CSL Infomedia Pvt. Ltd.

Manoj Agarwal

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Group Captain Umesh Kumar	ग्रुप कप्तान उमेश कुमार
Joint Advisor	संयुक्त सलाहकार
Broadcast and Cable Services Division	प्रसारण और केबल सेवाएं प्रभाग
Telecom Regulatory Authority of India	भारतीय दूरसंचार विनियामक प्राधिकरण
Mahanagar Doorsanchar Bhawan	महानगर दूरसंचार भवन
J.L.Nehru Marg, Old Minto Road	जवाहर लाल नेहरू मार्ग, पुराना मिंटो रोड
(Near Zakir Hussain College)	(ज़ाकिर हुसैन कॉलेज के समीप)
New Delhi - 110002	नई दिल्ली - 110002

Ph. No: +91 11 232664252 (Off); Telefax: +91 11 23220442; Mob: +91 964-380-4851

Email: umesh@tra.gov.in

Your Attitude, not your Aptitude, will determine your Altitude - Zig Ziglar