AKANGSHA NET COM

88A/6/1, BOSE PUKUR ROAD
KOLKATA-700 042

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To,

Shri Anil Kumar Bhardwaj, Advisor (B&CS),

The Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhawan.

Jawahar Lal Nehru Marg.

New Delhi-110002

"Consultation Paper on Market Structure and Competition in Cable TV Services," dated October 25, 2021.

I, Mrs Jayashree Mukherjee prop of M/S Akangsha Netcom, a LCO from West Bengal, would like to take this opportunity to express my gratitude for allowing me to submit comments on the various issues raised in the Consultation Paper on "Market Structure/Competition in Cable TV Services" on October 25, 2021.

Before submitting my comments on the Consultation Paper on "Market Structure/Competition in Cable TV Services" on October 25, 2021, LCOs including me has a feeling that the LCOs , architecture of today's cable TV industry will soon be witness to the episode of local cable operators (LCO) losing their income and business built up over a 32-year period.

Our worries are based on the large drop in the proportion of current revenue as Ill as the present rate of inflation in India.

Q1: Given that there are multiple options for consumers for availing television services, do you think that there is sufficient competition in the television distribution sector? Elaborate your answer with reasoning/analysis/justification.

<u>Ans. to the Q no. 1</u>:

However, given the large number of competitors and price war in the Indian television sector, it might be argued that in order to remain in a competitive market, LCOs must compete with a wide range of options, not only to stay in business.

JIOs have recently recovered their footing in terms of LCO income. I predict that the design of today's cable TV industry's local cable operators (LCOs) will soon witness a period of revenue and business loss.

There are also a number of uncontrolled OTT platforms.

As a consequence, I do not feel that clients require any other means of obtaining television services.

As a result, when it comes to cable TV, Indian customers have a profusion of options to select from.

As a LCO, I believe that there is no need for any other way for customers to obtain television services.

Q2: Considering the current regulatory framework and the market structure, do you think there is a need to regulate the issue of monopoly/oligopoly/market dominance in the Cable TV Services? Do provide reasoning/justification, including data substantiating your response.

Ans. to the Q no. 2:

I believe that only cable TV services need to regulate the problem of monopoly, oligopoly, or market dominance since an exclusive entity arises when a certain person or company is the exclusive supplier of a specific product.

Q 3. Keeping in view the market structure of television broadcast sector, suggest proactive measures that may address impending issues related to monopoly/market dominance in cable TV sector? Provide reasoning/details, including data (if any) to justify your comments.

Ans. to the Q no. 3:

As a LCO, I believe that in the case of the television broadcasting industry's market structure, only active action can be taken to address the oncoming challenges of market monopoly and market dominance in the cable business. Monopolization demands monopolistic power and the purposeful acquisition or retention of such power, as opposed to expansion or development brought about by a superior product, business savvy, or a historical accident.

Q4. Do you think that there are entry barriers in the Indian cable television sector? If yes, please provide the list and suggest suitable measures to address these? Do provide full justification for your response.

Ans. to the Q no. 4:

There is no barrier to entrance into the Indian cable television sector for an LCO who wants to undertake television business, and he can do so for as little as Rs. 500 for a Post and Telegraph License.

Q 5. Do you think that there is a need to regulate LCOs to protect the interest of consumers and ensure growth/competition in the cable TV sector? If yes, then kindly suggest suitable regulatory/policy measures. Support your comments with reasoning/ justification.

Ans. to the Q no. 5:

Both the Telecom Regulatory Authority of India (TRAI) and the Ministry of Information and Broadcasting (MIB) can levy fines for monopoly abuse. Because our answer is no, it is acceptable to conclude that the emergence of major houses in the television industry has cornered minor enterprises like LCOs because of their special proclivity to exploit customer purchasing power.

Q6. What should be the norms of sharing infrastructure at the level of

LCO to enable broadband services through the cable television infrastructure for last mile access? Is there a possibility that LCO may gain undue market control over broadband and other services within its area of operation? If yes, suggest suitable measures to prevent such market control. Provide detailed comments and justify your answer.

Ans. to the Q no. 6:

Speaking on What infrastructure sharing policies should be implemented at the LCO level in order to allow broadband services to use television infrastructure exclusively for last mile access? It can be said that the system in question is dependent on the ISP, the LCO's capacity to share data acquired by ISPs solely on its TV network infrastructure, there is no substantial role for LCOs to effectively meddle with the infrastructure, design, or resources of broadband services.

All possible paths for creating undesirable market control over the internet and other services within the scope of LCO have previously been explored.

Competition among a plethora of multinationals, businesses, and ISPs has already produced unfavourable results.

Q7. What should be the relevant market for measuring the market power of cable services? Do provide full justification for your response.

Ans. to the Q no. 7:

the Indian cable TV market can be based on the number of customers rather than a specific region or state, for example, among the 29 states and 7 union territories of the country, there are metro cities such as Delhi, Mumbai, Kolkata, and Chennai where the number of customers, capacity, and compatibility are not equivalent to other cities. The Harfindhall-Herschmann Index (HHI), which evaluates the number of enterprises in the market and their market share, and the Learner's Index, which measures the degree to which prices are marginal, are two quantitative metrics that may be used to evaluate a firm's market competence.

Simply expressed, market power is a measure of a company's capacity to successfully influence the pricing of its products or services in the market as a whole.

No, the relevant market for determining market strength in the television industry cannot be primarily dependent on the state. Due to its size, the customer base of 29 states and 7 union territories will be useful for gauging market strength. Assuming a set number of players for each state, it is plausible to conclude that, while the subject matter is valid, its futility and impracticality will be apparent after implementation.

Q 8. Can a state or city or sub-city be identified as relevant geographic market for cable television services? What should be the factors in consideration while defining relevant geographic market for cable television services? Do provide full justification for your response.

Ans. to the Q no. 8:

A relevant product market includes all products and/or services that the consumer considers interchangeable or substitutable based on the products' characteristics, prices, and intended use; a relevant geographic market includes the area in which the firms involved in the supply of products or services operate and where competition is sufficiently homogeneous.

As a result, while determining the appropriate geographic market for cable television services, the market should be assessed independently for each unique geographical market.

The state or city or sub-city cannot be identified as a relevant geographic market for cable television services. It's the point where a relevant product market intersects with a relevant geography market.

Since India is one of the most varied countries in the world, a state, city, or sub-city can never be designated as a significant geographical market for television services.

A relevant market is one where a certain product or service is offered for sale. The geographic market is a region in which all merchants have the same competition circumstances for the product in question. According to the 2001 census of India, the nation contains 122 major languages and 1599 additional languages, as Ill as more than 700 ethnic tribes, each with their own customs and entertainment.

With a total area of 3,287,263 square kilometres, India is the world's sixth biggest nation.

Indian culture is frequently referred to as a synthesis of many civilizations.

Q 9. Do you think that MSOs and its Joint Ventures (JV) should be treated as a single entity, while considering their strength in the relevant market? If yes, what should be the thresholds to define a MSO and its JV as a single entity? Do provide full justification for your response.

Ans. to the Q no. 9:

A merger occurs when two firms unite to establish a single corporate company, which is sufficient to regard as a single entity but does not need a "unity of interest" between the members of the joint venture, as is the situation when a parent and its fully owned subsidiary merge. In terms of whether MSO and its joint venture (JV) should be treated as a single business, joint ventures provide a broad range in terms of their cost-benefit ratio, where costs equal competitive advantage and advantage equals competitiveness.

As a result, as LCO, I believe that MSO and its joint venture (JV) should not be treated as a single company. A joint venture occurs when two or more distinct entities unite to form a new entity, which may or may not be a partnership.
There are several motivations for forming temporary alliances with

other firms, including the need for expansion, the creation of new goods, or entry into new markets (especially overseas). Because an MSO and its joint venture (JV) should not be treated as a single entity, I have no influence in determining the standards for designating an MSO and its JV.

Q 10. Which method is best suited for measuring the level of competition or market concentration of MSOs or LCOs in a relevant market?

a) **Provide your suggestions with justification.**
b) **Do you think that HHI is appropriate to measure market concentration of MSOs in the relevant market? Do provide full justification for your response.**
c) **If yes, then in your opinion should MSO and its JVs may be considered as a single entity for calculating their HHI? Do provide supporting data with proper justification for your response.**

Ans. to the Q no. 10:

The statement of an LCO is about which technique is optimal for establishing the amount of competition or market density of an MSO or LCO in the relevant market.

1. a) To assess the level of competition or market density among MSOs,

   At the present, MSOs' diversified activities are moving away from market competition and taking on a fatal shape in order to construct a competitive market (exclusive, oligopoly market) that will show the face of profit.

   Examining today's market structure, it appears that exclusive competition and oligopoly market structures are centred mostly in perfect competition and exclusive markets.

(b)I think the HHI is appropriate and useful for estimating MSO market density in the applicable market.

(c) For HHI calculations, MSO and its JVs are regarded as a single entity since LCO HHI must be acceptable and relevant in order to assess MSO market density in the relevant market. It is calculated as the sum of the market shares of each market participant.

Q 11. In case you are of the opinion that HHI may be used to measure market concentration of MSOs in the relevant market, then is there a need to revise threshold HHI value of 2500 as previously recommended? If yes, what should be the threshold value of market share beyond which an MSO and its group companies should not be allowed to build market share on their own? Do provide full justification for your response.

Ans. to the Q no. 11:

The application of market share criteria, on the other hand, incorporates two independent questions:

First, how much market power does a specific circumstance have?

Because it is useful to examine how much competition a company faces when determining if it has adequate market potential, it is also useful to examine how much competition an enterprise faces.

I have already stated that the lower the index, the more competitive the market gets, and that the index may be zero in the case of perfect competition.

A company is more likely to be influential if its competitors are in a poor position or if it has a large and consistent market share.

Because I, as LCO, believe that HHI may be used to gauge the market density of MSOs in the relevant market, I are debating whether the recommended threshold of 2500 should be altered. Furthermore, because market shares are not a measure of market strength but rather a component that conveys their dimensions in a certain context, they are both unequivocal responses.

There is no market share criterion for determining dominance.
Share of the market. For example, it is vital to analyse the position of other companies in the same industry and how market share has evolved over time.

Q 12. Do you think that there should be assessment of competition at LCOs level on district/ town basis? If yes, what should be threshold HHI in your opinion for such assessment. Justify your answer with detailed comments and examples.

Ans. to the Q no. 12:

However, there are challenges in effectively evaluating quality by the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI), as Ill as problems in determining quality impacts in the setting of increased competition.

As a result, none of these aspects of competition will evaluate competition at the LCO level, and as previously said, LCOs are sacrificing to survive the business, so regardless of the concessions, there is no competition.

Although quality is an important problem in competition policy, it is a challenging one to address.

According to one of the main concepts of microeconomics, competition diminishes market value until it matches the marginal cost of a skilled firm.

However, if the competitiveness is assessed at the LCO level on a district/city basis, I believe the HHI threshold should be less than 0.01 (or 100), indicating a highly competitive zone.

The amount of quality that a product provides to consumers is a critical part of market competitiveness.

Consumers might differ on what "good quality" implies for a specific product at any price. Quality is most likely the most important non-price factor in determining whether or not a buyer will purchase a product. With this in mind, is there any economic strategy in place to address the impact of competition on quality?

However, it is unclear how to add quality factors into genuine competitive analyses.

Q 13: In cases where a MSO controls more than the prescribed threshold, what measures/ methodology should be adopted to regulate so as to bring the market share/HHI below the threshold level? Specify modalities for implementation and effects of such process. Do provide full justification of your response.

Ans. to the Q no. 13:

If an MSO controls more than the stipulated threshold, what steps should be done to control the market share / HHI to bring it below the threshold level and what is the systematic application for the implementation and effect of such a process?

My statement in this regard,

Controls may act as either a stimulus or a barrier to technological progress. As technologies advance, regulators throughout the world are reconsidering their approach, embracing agile, repetitive, and collaborative approaches to face the difficulties posed by the rising technological revolution. To encourage innovation, authorities are also developing results-based policies and testing new approaches. This can help regulators strike a better balance between consumer protection and innovation.

As a result, if a single MSO or a group of MSOs control more than the mandated threshold, a legal and regulatory framework must be established to reduce the market share / HHI below the threshold level. Those who use digital technology to investigate the particular regulatory issues provided by business models will develop a legal and regulatory framework based on mail, paper, and word.

Q 14. Do you think that DTH services are not perfect substitute of cable television services? If yes, how the relevant market of DTH service providers differs with that of Multi System Operators or other television distribution platform owners? Support your response with justification including data/details.

Ans. to the Q no. 14:

I cannot declare if DTH services are the best replacement for cable television services since I am just concerned with television services and do not enjoy DTH services.

On the other hand, it can be said jokingly, that LCOs would be pleased, if DTH services are more than just a substitute for television services. On the other hand, DTH spends millions of rupees against the greatest operators and slanders the top actors in India solely to demonstrate how horrible the operator and cable television service are.

As a LCO, I may state that I am unaware of the nature of DTH services.

Q 15. Is there a need to change the criterion of market share in terms of number of active subscribers for determination of market dominance? Should the active subscriber base of JVs may also be considered while determining the market dominance of a MSOs. Do elaborate on the method of measurement. Provide full justification for your response.

Ans. to the Q no. 15:

In response to question 13, I discussed if it is required to modify the market share requirement in terms of active subscribers in order to show market dominance.

It is controversial whether setting specific market share standards o n a case-by-case basis is acceptable.

Q 16. How the new technological developments and alternate services like video streaming services should be accounted for, while determining market dominance? Justify your response with data/ detailed comments.

Ans. to the Q no. 16:

As a result, I can concentrate on a variety of independent variables, such as cost, media options, customer service, and population, as Ill as LCOs' perspectives on how to account for new technological developments and alternative services, such as video streaming services, when determining market dominance.

The growing number of devices capable of supporting digital media has increased internet consumption speed while also allowing users to access media content of their choice, whether it be information, entertainment, or social activity, at any time and from any location. While these new entrants try to boost the Indian digital video supply industry, YouTube, with its user-generated content approach, maintains its first-mover advantage, accounting for more than half of all videos watched online in India.

Costs related with internet streaming, media alternatives, ease of use as an independent variable, sociological trends, and population all have the potential to be explored. Many studies have been undertaken to study the link between consumer adoption and online media, as Ill as crucial factors such as cost, ease of use, and social trends.

As digital media advances, the rivalry between cable television and online streaming services grows. Aside from this huge established media player within, new NexGTV and Mundu TV are seeking to disrupt the TV viewing experience by providing on-demand TV programmes via technology and mobile platforms. In contrast to cable TV, only societal trends and viable alternatives Ire important in the regression model for online streaming. Despite the fact that an increasing number of people choose to view video on their second and third screens, the Content Player works across platforms and screens, with platform-agnostic and service choices on the way. Globally, the primary drivers of this trend include increased Internet penetration, the proliferation of mobile devices, and the ease of accessing material at any time.

In keeping with global trends, Indian consumers are increasingly consuming content via digital media.

Q17. If HHI is used for measuring the level of competition, do you agree with the restrictions prescribed in TELECOM REGULATORY AUTHORITY OF INDIA (TRAI)'s previous recommendations? If no, do provide alternative restrictions for addressing monopoly/market dominance in a relevant market. Do provide full justification for your response.

Ans. to the Q no. 17:

Although I agree with the limits outlined in previous TRAI recommendations, my request as an alternative to monopoly/market dominance in the relevant market,

There is a well-known conflict between the need to nurture innovative and efficient performance that may lead to market domination and the need to ensure that such marketable firms do not engage in abusive behaviour to achieve or preserve monopoly power. The behaviour of a single firm is a more perplexing area of competition policy, and there is a considerable lot of variation between countries. The competitors defend their agreement that their distributors should not communicate with the distributors of their competitors. A pro-competition scenario is improbable.

Q18. M&A in the cable TV sector may lead to adoption of monopolistic practices by MSOs. Suggest the measures for curbing the monopolistic activities in the market. Explicitly indicate measures that should be taken for controlling any monopolistic tendency caused by a merger or acquisition. Do provide proper reasoning/justification backed with data.

Ans. to the Q no. 18:

Potential competition has only challenged the highly competitive activities in the TV business and among new market entrants to encourage competition and entrance.

It is a mechanism for implementing and enforcing competition policy, as well as preventing and punishing anti-competitive corporate practices and unwarranted government intervention in the market.

Conduct instruction, practical application, and ongoing research to integrate all results into a cohesive framework by diving deeply into the most essential aspects of oligopoly and the knowledge collected via the efficient use of new analytical tools in economics.

Vertical merger integration between buyers and sellers can boost cost savings and company integration, resulting in competitive pricing for customers. However, while vertical consolidation may have a detrimental impact on competition owing to a competitor's inability to obtain supply, certain requirements may be necessary before authority consolidation can be accomplished. When firms with a dominating market share merge, the government must evaluate whether the new corporation will be able to impose exclusive and anti-competitive pressure on the existing entities.

According to my opinion on the matter of measures for curbing the monopolistic activities in the market and explicitly indicate measures that should be taken for controlling any monopolistic tendency caused by a merger or acquisition. Authorities frequently oppose consolidation between competing firms that provide closer alternatives, claiming that consolidation will decrease beneficial competition.

The Exclusive and Prohibited Trade Practices Act of 1969 The Competition Commission of India was founded under this Act to combat practices that harm competition in India. It is prudent to take precautions to prevent monopolistic behaviour in the market and to regulate any monopoly tendency that may arise as a result of mergers or acquisitions. As LCO, I feel that the emphasis on its ideological theory, regulation, and competition policy will be very practical.

Q 19. Ease of doing business should not be adversely affected by measures/ regulations to check merger and acquisitions. What compliance mechanism or regulations should be brought on Mergers and Acquisition to ensure that competition is not affected adversely, while ensuring no adverse impact on Ease of Doing Business? Do justify your answer with complete details.

Ans. to the Q no. 19:

Merger and acquisition compliance measures or regulations should be designed to ensure that competition does not adversely influence the ease of doing business through merger and acquisition regulation or guidelines. According to our request, because to India's significance as a market for global enterprises, M&A transactions in India may increase in the next years. Furthermore, at a time when businesses are striving to diversify and risk-free their supply chains, India is an intriguing option for businesses wishing to develop and expand their manufacturing operations.

Limit the manufacture or supply of similar or identical or replaceable products or services; and refrain from engaging in any activity involving the provision, production, supply, distribution, storage, sale, or trade of services or goods, or the provision of services at different stages or levels of the production chain.
Not engaged in any activity involving the production, supply, distribution, storage, sale, or exchange of goods.

Not engaged in any activity that involves the production, supply, distribution, storage, sale, or exchange of services or products, or the provision of complementary services to one another.

The RBI issued the Cross-Border Merger Regulation, which establishes the operational framework for executing the relevant parts of the

Companies Act dealing with cross-border consolidation. A cross-border merger is a merger, consolidation, or agreement between an Indian firm and a foreign corporation. Cross-border ties might be internal or external in nature. An inward merger occurs when the company is an Indian entity. When a foreign corporation obtains control of a subsidiary firm, this is referred to as an outbound merger. The phrase "resulting firm" refers to an Indian or foreign corporation that acquires the assets and liabilities of another corporation as part of cross-border consolidation.

Consolidation in India, including cross-border consolidation, must be supervised by a court and approved by the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI). The procedure may begin with an agreement between the parties, but this alone will not provide legal legitimacy to the transaction.

Agencies may simply seek additional approval from such regulators in order to complete an M&A transaction, including television purchases.

Q20. Do you agree with the definition of 'control' as provided in the 2013 recommendations? If not, then suggest an alternative definition of 'control' with suitable reasoning/justification.

Ans. to the Q no. 20

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Agencies may simply seek additional approval from such regulators in order to complete an M&A transaction, including television purchases.

Q 21. Do you think that there should be different definition of 'control'

for different kinds of MSOs? Do explain with proper justification.

Ans. to the Q no. 21:

It makes no difference if you have a different definition of "control." "A rose is a rose," regardless of what you call it.

There are two degrees of control: strategic and operational.

Consider a person behind the wheel of an automobile. Strategic control ensures that the vehicle is travelling in the right direction, while managerial and operational control ensure that the vehicle is in outstanding condition before, during, and after the journey.

Following the strategic control strategy as it is performed, using that comparison, suggests that the strategy is defective in terms of recognising any issue areas or potential problem areas and making the necessary changes. Strategic control enables you to scroll back and forth to explore larger photographs and ensures that all image areas are correctly aligned.

It is crucial to remember that many different types of controls exist between the strategic and operational levels of control. The first two kinds are classified as activity level and behaviour vs. consequence.

Q 22. Should TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) restrict the ambit of its recommendations only on certain kinds of MSOs? Do provide full justification for your answer.

Ans. to the Q no. 22:
Multinational corporations can also make some new actions by building on a solid economic basis, providing a plentiful opportunity to eliminate small participants from the market by paving the way for specific consumer benefits.

As a result, the principles of anarchy, disorder, lawlessness, and illegitimacy are as powerful as the enormous fishes that consume the little fishes; they are illegal, unconstitutional, and prohibited in the eyes of the law due to anarchy, chaos, and boundary violation.

I request the government of India to allow multinational enterprises to supply their services to clients through LCOs, based on 32 years of experience and competence in the same field and as the owner of the newest digital service-enriched network.

As a result of these considerations, our major request as an LCO organisation is that the scope of its recommendations be limited to particular categories of MSOs while keeping the following criteria in mind.

The existing regulatory framework needs a review of what may be a set of regulations to relieve unpleasant and challenging conditions for local cable operators (LCOs).

When market conditions change, multinational firms may relocate from one region to another.
Another advantage of multinational firms is their ability to avoid regulatory scrutiny.

Furthermore, by using the expertise of a global workforce, multinationals may access a huge pool of technology capabilities.

Q 23. Do you agree with the disclosure and monitoring requirements mentioned in the 2013 recommendations to monitor the TV distribution market effectively from the perspective of monopoly/market dominance? If no, provide alternative disclosure and monitoring requirements. Do provide full justification for your response.

Ans. to the Q no. 23:

Taking use of a monopoly or a market domination unit MSO is frequently defined as the use of unethical methods to gain or maintain market power. To properly monitor the market, we must agree on the terms of the disclosure provided in the TELECOM

REGULATORY AUTHORITY OF INDIA (TRAI) guideline from 2013, as well as the necessity for monitoring.

Q 24. Elaborate on how abuse of dominant position and monopoly polr in the relevant market can manifest itself in cable TV services. Suggest monitoring and remedial action to preserve and promote competition. Do provide full justification for your response.

Ans. to the Q no. 24:

Explaining in detail how a dominant position in the relevant market and monopoly power can only manifest themselves in TV services, it could be stated that the loss of consumer welfare due to insufficient competition will necessitate scale and mechanisms to promote competition rather than economic gain.

Influential MSOs may provide a bigger revenue share to LCOs, pulling them away from lesser MSOs.

Although some markets in India may display market dominance characteristics, under Indian law, competing with the current regulatory system is forbidden.

There are also a large number of small MSOs that have had a significantly unfavourable influence on the operations of small MSOs and LCOs, as well as the customer base developed as a result of the free offer effect.

Small MSOs and LCOs should always be supported. If small MSOs and LCOs were prevented from entering the market, big MSOs and businesses would definitely dominate and suffer the negative consequences of consumer governance.

Customers will have additional alternatives for local channels and value-added services, which is a win-win situation for both consumers and LCOs.

Q 25. Is there a need to recommend cross-holding restrictions amongst

various categories of DPOs/ service providers? Do give detailed justification supporting the comments.

Ans. to the Q no. 25:

Cross-holding, also known as cross-shareholding depicts a situation in which one publicly traded firm replaces another publicly traded company in order to determine if DPOs or service providers should advocate cross-holding limitations in separate departments.

Cross-holding price supporters have also said that the practise may protect a company whose shares may protect another company from a possibly unfavourable takeover since the quantity of cross-holdings may be sufficient to hinder takeover operations.
In addition to possible valuation difficulties, cross-holding detractors contend that investments in cross-holdings are typically wasteful uses of capital—capital spent in the stocks of other firms may be used more effectively if directly invested in core business development.
As a result, as LCO, I humbly suggest that authorised authorities campaign for cross-holding limitations in various departments of DPOs/service providers, and those cross-holdings be managed.

Any Other Issues

Q 26. Stakeholders may also provide their comments on any other issue relevant to the present consultation

Ans. to the Q no. 26

As a result, as an LCO, I would like to attract the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) and other authorities' attention to my views on the presence of LCOs in the cable TV sector, healthy competition in the cable TV market, and guaranteeing the commercial existence of LCOs. It is undeniable that the LCOs' passion, hard work, and faith during the past 32 years have aided in the evolution of cable TV into a multibillion-dollar industry. Cable TV has become the most up-to-date application of current technology as a consequence of the LCOs' tireless labour, at various times on their own initiative, which has resulted in LCOs developing considerable employment with customer satisfaction. Despite this, LCOs today are terrified of losing business owing to unfair and unhealthy competition, pricing wars, free offerings, and other factors that make it hard for them to compete.

Providing LCOs with corporate security.

The multi-billion dollar industrial architecture and creator, the local cable operator (LCO), will soon see the business they established over 32 years, the revenue of that business, and the loss of that business. To retrieve set-top boxes from terminated cable TV subscribers (police brutality or criminal case if set-top box cannot be recovered), to take advantage of a free or low-cost offer, or for any other unknown motive.

LCOs are tiny entrepreneurs who operate in low-profit and small company units to build the broadband backbone for the current ECO system digital highway.

LCOs will create more money, assist enhance the national economy, and increase job prospects for individuals in rural regions by linking them to a national fiber-optic network to deliver internet to their consumers. If a possible business model is developed for operators with the correct technology vendor backing, they will not only build end-mile networks but will also sell them to the local community in order to benefit the people and know how to do so.

Encourage LCOs to build MSOs.

Our aim is that the TV business can only thrive if the greatest degree of experience working at the grassroots level of TV demonstrates the flexibility of LCOs to demonstrate their legal flexibility to emerge as MSOs.

MSOs are the most significant impediment to the transformation of LCOs into MSOs, since MSOs have "abused their market position" to block the creation of new players.

If the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) and other authorities take the initiative and take the first measures to make LCOs look as MSOs, the initial response from LCOs should be positive. Furthermore, they can provide a good revenue share to tempt local cable providers away from tiny MSOs.

OTT (Over-the-Top) services

Because OTT services are a paid service that consists fully or mostly of signal transmission and is provided electronically, they must be registered under the Telecom Act. The TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) should take initiatives to improve communication networks. Failure to do so should be considered a significant offence that might jeopardise user interests and competitiveness. The government's and regulators' attitudes regarding OTT services will be the most important determinant of their expansion. It is critical to remember that high-speed internet access, the opportunity it provides for the creation of new business models such as OTT, and the ramifications for telecom providers all point to a technological revolution. Throughout history, there have been "winners" and "losers" in technical revolutions, but what should be considered in the end is the eventual total influence on the well-being of society as a whole.

As a result, the government and the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) should promote this process rather than obstruct it. Establish a level playing field for competition, innovation, and investment in the national telecoms ecosystem. Learn about the economic, policy, and consumer welfare aspects of OTT, such as the regulatory framework and economic incentives. Create rules and/or regulatory frameworks that will allow network operators and OTT providers to compete more fairly.

Encourage OTT and network operators to collaborate. Online communication service providers must be subject to some sort of regulation.

A licencing system may not be the best method to go about it because it is impractical and reduces the value of the Internet to citizens.

Free Dish on DD

LCOs are outraged that paid channels are being made available for free on DD Free Dish. Because DD Free Dish is a free-to-air (FTA) DTH service, there is no monthly subscription and just a one-time purchase for dishes and set-top boxes is required.

DD Free Dish, on the other hand, is unaffected by the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) rule and is exempt from all tariffs and the encryption rule.

The Goods and Services Tax (GST)

The establishment of the Goods and Services Tax in 2017 has a significant influence on various goods and commodities, the most visible of which is a price shift. The government has imposed an 18% GST levy on cable television services.

Prior to the advent of GST, cable TV subscribers had to pay a service tax of 12%. However, after the implementation of the 6% additional GST on cable TV service tax, purchasing cable TV bundles has grown more expensive.

Viewers will profit if they seriously consider lowering GST for cable-TV and work to re-evaluate GST.

Television commercials

Television commercials have become an essential tool of promotion for many sorts of businesses and services. TV networks operate in a market with monopolistic competition. Different TV stations broadcast various programmes at their regular times, with sponsorship from various advertisers. The efficacy of advertising is determined by the number of viewers who pay close attention to the commercial and get the messages that the manufacturer is giving to their target clients.

Several TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) notifications on ad cap regulation and the duration of advertisements on TV channels state that no broadcaster shall carry in its broadcast of programme advertisements exceeding twelve minutes in a clock hour, and any shortfall in advertisement duration in any clock hour shall not be carried over.

Bangladesh's Ministry of Information and Broadcasting has issued an order requiring the use of only "clean feeds" (a clean feed is one that is free of contaminants).

Consolidation of MSOs or joint venture

Details on how to ensure the future business security of the LCO for the latest venture with the confidence of the LCOs associated with that MSO should be provided in the case of an MSO consolidating or joint venture to protect its business interests, acquiring another MSO, or merging with a corporate entity.

My appeal to the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) In view of the subject-matter, I have supported and shouted in favour of the inception and implementation of the DIGITAL ACCESS SYSTEM and always upholds the subscribers' interests as well as the TELECOM REGULATORY AUTHORITY OF INDIA (TRAI) thinking, recommendations, and guidelines regarding the DIGITAL ACCES

I think the foregoing remarks provide you with appropriate knowledge, and I believe you should extend your hands of

AKANGSHA NET COM
88A/6/1, BOSE PUKUR ROAD
KOLKATA-700 042

cooperation and effort to the cable TV providers in order to get to the bottom of the current difficult conditions.

Without prejudice to my rights and claims in the Consultation Paper on "Market Structure/Competition in Cable TV Services," I highlight the problems that need to be addressed by the competent authorities.

Thanking You,

JAYASHREE MUKHERJEE

PROPRIETOR

9831134024

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