

Indian Cable Net Company Ltd.

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NETWORK

Dated 28th August'2013

To,
Mr. Wasi Ahmed,
Advisor (B&CS),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
J L Nehru Marg, New Delhi - 110002

Dear Mr. Ahmed,

Comments on the draft amendments vide Consultation Paper No. 8/2013 (Consultation Paper on Distribution of TV Channels from Broadcasters to Platform Operators)

The steps proposed by TRAI are in correct directions and we appreciate the same. However, we would like to draw kind attention and suggest the following related points/issues –

- a. Definitions & Roles of Aggregators, Authorised Distribution Agent and also distributors under the Aggregator/ Broadcaster must be provided and these identities must be brought under Authorities' rules and regulations.
- b. Channel Placement and Carriage Agreements are also being entered by some of these aggregators/authorised distribution agent. This shall not be allowed and a similar system should be followed as in the case of Content agreements.
- c. MSOs/Distributor of TV Channels has entered deal with these aggregators/authorised distribution agent and accordingly has published packages. As per regulations, package can't be revised within 6 months – However, due to changes in roles & responsibilities, new interconnection agreements and Carriage / Channel Placement (if the same is also subject to changed regulations) – the MSOs/Distributors should be given 6 month grace period and relaxation on the Package Reconfiguration from the date of these amendments coming in force.
- d. Broadcasters List (who can enter into agreements) & Broadcasters packages in Addressable as well as Non Addressable System should be posted on the TRAI Website.
The MSOs/Distributor of TV Channels and the Broadcasters should be required to finalise and execute all agreements within 60 days of these amendments coming into force and new package announced. TRAI should monitor the progress of the agreements entered and take appropriate actions, where required.

For Indian Cable Net Company Limited

Suresh Sethiya
(Director)



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