

From: **Rajeev Rawat** <rajeev.rawat@nstpl.co.in>
Date: Oct 24, 2016 10:32:45 PM
Subject: Comments on the Draft Telecommunication Tariff Order
To: pradybcs@traf.gov.in, vk.agarwal@traf.gov.in
Cc: sadhna <sadhna.bharadwaj@nstpl.co.in>

Dear Sir,

Greetings from NSTPL!!!

Following is the list of Issues/comments on the draft Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable system), Tariff Order, 2016 :

Issues:

1. **Status of Agreements between Broadcaster and Distributor of TV channels:** As per the consultation paper this order shall come into force with effect from 1st April, 2017 but it is no where mentioned about the status of agreements already done between Broadcaster & Distributor of TV channels which are valid even after 1st April, 2017.
2. **A-la-carte Rates in Phase III and Phase IV:** A-la-Carte rates of pay channels should be different in Phase III & IV as the ARPU from these areas is less as compared to ARPU from Phase I & II which in nowhere covered in the consultation paper.
3. **Platform Agnostic:** A-la-carte and bouquet rates of pay channels shall not be similar for different platforms as in case of DTH the customer is directly billed by DTH operator and there is no intermediate where as in HITS and other MSO platform the subscription charges will be shared with LCOs.
4. **Genre Rates:** Rates mentioned in Schedule II are itself high and the ceiling on MRP should be different for National and Regional Channels.
5. **HD Channel Price:** As per the consultation paper the maximum retail price of a pay channel transmitted in HD format shall not be more than three times the maximum retail price of corresponding channel transmitted in SD format, this ceiling is very high and needs to be worked upon.

Thanks and Regards

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