



Ortel Communications Ltd.

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Bringing Convergence to India

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Ref: ORTEL/TRAI/CP
Dtd: 15th November,2016

WITHOUT PREJUDICE
By HAND/E-mail

Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg,
NEW DELHI # 110 002

Kind Attention: Mr. S. K. Gupta, Principal Advisor (B & CS)

Subject : Comments on the draft Telecommunication (Broadcasting and Cable Services) (Eighth) (Addressable Systems) Tariff Order, 2016.

Dear Sir,

We welcome the draft tariff order in totality. However, we have one minor suggestion as below:

Please go through the point no.6 at page 10 & sub clauses (8) at page no.11 of the draft tariff order, 2016, it states:


"XXXXXXXXXX 6. Manner of offering of channels by the distributor of television channels: (1) No distributor of television channels shall charge a rental amount exceeding rupees one hundred and thirty, excluding taxes, per month per set top box from a subscriber for providing a capacity so as to enable the subscriber to receive the signals of up to one hundred SD channels:XXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXX (8) Subject to the availability of capacity on its network, each distributor of television channels shall offer additional capacity to a subscriber in the slabs of twenty five SD channels each, beyond initial one hundred channels capacity referred to in sub-clause (1), at an amount not exceeding rupees twenty, excluding taxes, per such slab per set top box per month for such capacity: XXXXX"

We apprehend, the word "rental" mentioned in the draft tariff order 2016 has various connotations & implications. Different tax authorities may interpret the word "rental" for the purpose of tax calculation on set Top Boxes. There are various schemes like Hire Purchase, Outright purchase, lease, rental, any other scheme etc. for providing STB's by various DPOs. Writing again the word rental may lead to confusion or debatable for additional tax.

Therefore, it is suggested that we can use words like "Minimum Subscription fee" or "Basic Subscription charges" or "Basic Tier Fee" etc. as a substitute to the word "rental".

Thanking you,

Yours faithfully,
For ORTEL COMMUNICATIONS LIMITED


BIBHU PRASAD RATH
President & C. E. O