

Chennai Metro Cable Tv(CAS) Operators Association

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Respected Sir,

We Chennai Metro Cable TV(CAS) Operators Association have been working for the Cable TV Operators of Greater Chennai in particular and to safeguard the beneficial of the interest of Cable TV Subscribers. We hereby submit the comments for the 20th Dec 2012 Dated consultation paper on Amendments on Interconnection for DAS & TARIFF Order for AS. We presume that both Digital Addressable Cable TV System and Addressable Systems are same?

A.

Carriage fee

1) In the clause 3(2) of the interconnection regulations for DAS and the clause 3(5) of interconnection Regulation for DAS should be deleted?

CMCOA COMMENT: The Carriage fee from Broad casters is Must and it should be shared between MSO:LCO as LCOs investment in ground distribution is Huge infra structure in CATV,200 times more than MSOs to reach millions of Set top box.

A Carriage fee must be fixed by TRAI by determining the Ratio, genre wise ceiling based on TRP of that particular channel.

2.if no, the reasons thereof

CMCOA Comment : Not Applicable in the context of our comment for Question 1

Minimum Channel Carrying Capacity of 500 Channels for MSOs

3) Whether there is a need to specify certain minimum channel carrying capacity for the MSOs in the interconnection regulations for DAS.

CMCOA Comment : YES

(4)CMCOA Comment : In CAS area from 2003, along with 85 analog channels 200 plus DIGITAL channels are being carried to CPE(customer stb's), in DAS the minimum carrying capacity should be 60% of the I&B permitted FTA Channels and 100% of that mother tongue language of control room state and neighboring states channels to cater the inter - state population.

The Categories may be fixed as follows:

CMCOA COMMENT: Cities with more than 20 lakhs Set Top Boxes minimum 60% of I&B Permitted FTA Channels

Cities with more than 10 lakhs Set Top Boxes minimum 50% of I&B Permitted FTA Channels

Towns with more than 50,000 Set Top Boxes minimum 35% of I&B Permitted FTA Channels

Towns with more than 25,000 Set Top Boxes minimum 25% of I&B Permitted FTA Channels

Rural areas can't afford to install its own DAS Control Room they have take link with TOWNS

CMCOA COMMENT follows

Placement Fee

(5) Whether there is a need for regulating the placement fee in all the Digital Addressable Systems. If so, how it should be regulated. The stakeholders are requested to submit their comments with justifications

CMCOA COMMENT: The placement fee for Digital cable TV is concerned is must as it caters 90% of the TV homes with Huge infra structure in CATV.

The placement fee may be regulated by TRAI and can fixed by slab based on TRP ratings and the Same need not be shared to LCOs.

Twin conditions at retail level

(6) The stakeholders are requested offer their comments on the following twin conditions, to prevent perverse a-la-carte pricing of the pay channels being offered as part of the bouquet(s).

CMCOA COMMENT : To avoid the perverse a la carte pay channel pricing TRAI has to fix the a la carte pay channel rates as in CAS Regime for last 10 years because in India we allow pay channels the Advertisements Revenue.

To fix the a-la- carte Pay Channel pricing TRAI should not take the NON-CAS area formula instead TRAI should take its own the most successful CAS a-la- carte rate formula as in DAS 100% connects have STBs. So they have the option to choose the pay channel comparing to only 5% penetration in the case of Chennai. Hence the the TRAI should fix the pay channels rate less than Rs 2/- as million of Indian HOUSE holds are going the access the PAY CHANNELS through Compulsory STBs.

Minimum Subscription Period

(7) The stakeholders are requested to offer the comments, if any, on the proposed deletion of the word 'pay' in clause 6 and 6(2) of the principal tariff order dated 21.07.2010.

CMCOA COMMENT : The proposed deletion of "Word Pay"Should not be carried out as a customer need to Know What are the pay channels he is about to pay.

The main purpose of Digital TV introduction in 2003 is for Transparency only if you allow PAY CHANNELS to bundle along the FTA it will take back prior to CAS era ie Analog market Bundling ?

To avoid the above blunder the FTA has to delivered as commented in (4) minimum channel carrying capacity answer And the pay channel packs should be made genre wise/language wise and fixed by TRAI as in CAS.

Freedom to choose the channel(s) on a-la-carte and/or bouquet(s)

(8) The stakeholders are requested to offer their comments, if any, on the proposed inclusion of the following provision after sub-clause 6(4) in the tariff order dated 21.07.2010, as amended

CMCOA COMMENT ; IN sub-clause 6(4) the system to Subscribe to any bouquets may be as follows:

The BST in DAS has to be minimum 200 channels (because already 90 channels were delivered in analog mode throughout INDIA for last 5 years)

After BST Customer should be given opportunity to subscribe for pay channels in a-la –carte or in packs should be made genre wise/language wise and fixed by TRAI as in CAS.

Thank you for the opportunity hope a OHD will follow soon?

For CMCOA

Madhavan prabakar -Chairman - Technical Committee