

TAMILNADU CABLE TV SERVICE PROVIDERS ASSOCIATION

(Reg-519/2011)

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Date:18.01.2013

The Chairman,

Telecom regulatory authority of India (TRAI)

Mahanagar, Doorsanchar Bhavan,

Jawaharlal Nehru Marg (Old Minto Road)

New Delhi-110002.

Subject: COMMENTS ON TRAI CONSULTATION PAPER No.18/2012DT 20-12-2012

Respected Sir,

We, "TAMILNADU CABLE TV SERVICE PROVIDER'S ASSOCIATION" have been Working for the being of the Cable Tv operator's in particular & to safeguard the beneficial and the interest of the general public.

We extend our thanks to yourself (TRAI) for having made our hopes to truth. For the last few years, we have been bringing to your notice the difficulties faced by the last mile cable Tv operator and requesting yourself to end the anomalies in cable Tv industry as a whole.

"OUR COMMENTS ON TRAI CONSULTATION PAPER NO.18/2012DT 20-12-2012"

We would like to record our views on the consultation paper no.18/2012 Dt:20-12-2012, on the issues related to amendments to the interconnection regulations applicable for (DAS) Digital addressable cable Tv systems and Tariff order applicable for addressable systems.

Before taking any decisions on these issues, we kindly request you to note the following few points which we feel as the Trade regulator (TRAI) has forgotten.

1.The Cable Tv has been made to go for digital now is left unnoticed for the last 10 years whereas the competitive fields like DTH, IPTV were allowed to go digital and establish their field strongly.

2.The channel rates fixed for DTH are 50% less than the cable Tv which is unfair and it is meant to eliminate the cable Tv operators from the field.

3.The important issue that is forgotten is there is direct connection between the DTH, IPTV players with the consumers whereas in cable Tv the signal should pass from the Broadcasters to the consumers only through the MSO and LCO whose role is unavoidable.

4.It has been announced by the Honourable I&B Minister in the parliament that the life of lastmile cable Tv operators would be protected. but in reality the things are going against the cable Tv operators.

On the above grounds, we feel that these are the comments of us on the following issues:

(A) Whether the following provision should be introduced in the clause 3(2) of the interconnection regulations for DAS and the clause 3(5) of interconnection regulation for das should be deleted.

(B) Provided that the provisions of this sub-regulation shall not apply in the case of a Multi system operator who seeks signals of a particular Tv channel from a Broadcaster, while at the same time demanding carriage fee for carrying that channel on its distribution platform

Our comment: In DAS regime, the LCO is connected with the MSO who provides the signal and sharing the revenue of subscription with the LCO which is the only source of income for LCO with which only he has to survive.

In this to the BST has not been made as mandatory to the subscribers who can opt of a single channel of FTA or pay which will affect the LCO very badly and not able to maintain the Qos.

So the MSO should be allowed to collect carriage fees from the Broadcaster who seeks the particular channel from the Broadcaster and the regulator TRAI should make the bst mandatory to the consumers and revenue of BST should go to the LCO 100% and no sharing with the MSO as it was in CAS regime.

2. Whether there is a need to specify certain minimum channel carrying capacity for the MSO in the interconnection regulations for DAS.

Our comment: In DAS it has been made as mandatory for MSO to carry 500 channels and initially with 200 channels which is wrong.

It is well known fact from the survey conducted by the trade regulator TRAI that only 5 to 12 channels are viewed by the consumers of India.

It has been announced in DAS that it is optional to the consumer to select the channel even one, or more of FTA or pay.

In the above grounds it is not necessary to increase the No. of channels to 500. it has been made only for the benefit of the Broadcasters who earn more and more which has been proved by the fact of increase in channels from 165 to 825 as on date.

When the channel no goes to 500 it attract huge investment which the cable Tv operators cannot mobilize and leave the entire field to the existing national MSO to monopolize it.

So as the TDSAT observed the no of channels to be carried by the MSO is to be left to the market forces to decide according to the need of the customers and as per the need of the region.

3. Whether there is a need for regulating the placement fee in all the digital addressable systems. if so how it should be regulated.

Our comment: placement fee will play a vital role in das regime too and it is a main source of income to MSO and it should be left to the market forces to decide.

In DAS specific days should be fixed for RIO as to avoid the Broadcasters to drag on without providing their content to the new Independent MSOs formed by LCOs.

The channel rates should be at par to Cable Tv , DTH, and IPTV.

From the past experience and the cases pending in TDSAT it can be understood that in most of the cases the Act violators are the Broadcasters and they are protected by all means which should be avoided by fixing reasonable norms to restrict the Broadcasters from violating the rules.

Thanking you sir,

With Regards,

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