

*By Email*

November 15, 2016

**Sh. Sunil Kumar Singhal**

Advisor (B&Cs)  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi 110 002

**Sub. :** Comments on Consultation on Draft Telecommunication (Broadcasting and Cable Services) Interconnection (Addressable Systems) Regulations, 2016 and Draft "Telecommunication (Broadcasting and Cable Services) (Eight) (Addressable Systems) Tariff Order, 2016

**Dear Sir,**

We take this opportunity to thank this Hon'ble Authority for issuing the Consultation papers on Draft Telecommunication (Broadcasting and Cable Services) Interconnection (Addressable Systems) Regulations, 2016 and Draft "Telecommunication (Broadcasting and Cable Services) (Eight) (Addressable Systems) Tariff Order, 2016.

In response to the above, we hereby kindly submit as follows:

1. We represent a host of Music Channels including 9XM, 9X Jalwa, 9X Jhakaas and 9XO and humbly submit that music genre is not being categorized as a separate genre and has been made part of General Entertainment Channel . This clubbing with General Entertainment Channels, puts our channels at a disadvantageous position *vis-a-vis* GEC Channels. Therefore, our kind submission is that Music Channels should be identified as a separate genre.
2. Secondly, we believe that the capping of carriage fees is a step in right direction and will help the cause of small broadcasters. However, smaller broadcasters are also required to pay Placement Fee. Given the scenario of capping of Carriage Fee, we have apprehension that carriage fee though regulated will take its new avatar under the guise of placement fee. In view of the same, we propose that in addition to capping of Carriage Fee, Placement Fee shall also be regulated and capped.

If this Hon'ble Authority requires any further clarifications in this regard, we shall be glad to assist.

Thanking you,

For **9X Media Private Limited**

  
**Nitin Sharma**  
**Senior Vice President - Distribution**



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