

Subject: **Counter comments for the Consultation paper on Tariff related issues for broadcasting dt. 16-08-2019**

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From: asaa kerala <asaakerala@gmail.com>

To: arvind@traf.gov.in, vk.agarwal@traf.gov.in

Dear sir,

I am submitting the following counter comments for the various comments received from organisations, Associations, Broadcasters, MSOs, etc

- 1) The revenue share of the pay channel cost should be as follows between Broadcaster, MSO and LCO : 45:35:20 as suggested in the comments
- 2) MRP of a Pay channel should not be more than the normalised equivalent wholesale price based on the Pre regulation price as on January 2019 - this must be mandated by TRAI
- 3) Since NTO was implemented on 01-02-2019 the NCF should be re fixed taking into account of the normalised equivalent wholesale price as on January 2020 ie:if the normalised equivalent wholesale price is 1.5 in January 2020 NCF in February 2020 should be Rs.195 (130 X 1.5)
- 4) Broadcasters should report only a la carte prices of their pay channels (and not their bouquet prices) Broadcaster bouquets always prevent the freedom of subscribers to chose their channels and result in compelling the customers to view unwanted channels.
- 5) BST should contain 100 FTA (SD) channels including all the regional language FTA channels , at least 3 to 5 FTA channels of other languages like Bengali, Kannada, Telugu, Hindi, English, etc. and the mandatory Doordharsan channels
- 6) Bouquet of channels should be created by MSOs (Distributors)
- 7) MRP of pay channels should be the same for SD and HD

Dr.A.K.Jose - General Secretary (Asianet Satcom Associates Association of Kerala)