

Q1. Do you agree that flexibility available to broadcasters to give discount on sum of a-la-carte channels forming part of bouquets has been misused to push their channels to consumers? Please suggest remedial measures.

Yes, Flexibility given to broadcaster has been entirely misused and elementary purpose of consumer choice through channel selection has been defeated.

Remedial Measures: -

Broadcaster have two revenue streams; one is subscription and the other is advertisement. The ratio of subscription to advertisement as per the FICCI report 2019 is 60% vs 40%. Subscription revenue is INR 481 Billion and Advertisement Revenue is INR 333 Billion and Total TV revenue is INR 815 Billion.

Broadcasters are getting substantial amount revenue from advertisement.

Broadcaster should come out with two option of channel delivery

Channels with advertisement

- 1. These channels with advertisement should have capping of discount on formation of bouquets as the alternative source of revenue generation is through advertisement is available.*
- 2. And in my view TRAI should exercise the option of discount rather than leaving it to broadcaster*
- 3. Disadvantages of advertisement-based channel: -*
 - In span of one hour we get minimum 12 min of advertisement which increases the length / time of programme.*
 - Average TV time spent per home is 3 Hours so the total ad break per home is approx. 36 Min per day and 1080 Min (18 Hours per month) and annually it is 12960 Min (216 Hours)*
 - This is waste of time from consumer point of view. We pay broadcaster charges for the content not to watch the advertisement.*
 - 18 Hours per month is lot of electricity consumption and electricity charge are very high and will continue to rise which leads to increase in the electricity bill per month by xxx Unit X Unit Rate = Rs.xxx extra burden per home.*
 - 18 Hours per month advertisement means unnecessary consumption of Tv's resources which reduces the life of TV especially Plasma, LED Tv.*
- 4. Second option will be ad free channel and, in this offering, there should not be any capping on bouquets as well as pricing of ala-a-carte channels and broadcaster should be given complete freedom to form the bouquets.*

Q2. Do you feel that some broadcasters by indulging in heavy discounting of bouquets by taking advantage of non-implementation of 15% cap on discount, have created a non-level field vis-a-vis other broadcaster?

- Yes, Broadcaster are offering their channels on discriminatory basis and complete disadvantage has been taken to promote the niche/weaker channels.
- Secondly, depending upon the market condition/monopoly, subscriber base etc broadcaster are offering huge discounts which is more than 50 % to 60% on account of penetration, LCN, Marketing, Landing Page etc.
- This heavy discount is not passed onto consumer and it will be additional revenue for platform.

Q3. Is there a need to reintroduce a cap on discount on sum of a-la carte channels forming part of bouquets while forming bouquets by broadcasters? If so, what should be appropriate methodology to work out the permissible discount? What should be value of such discount?

Yes, there is need to reintroduce the cap on discount. Channels should be priced as per the consumption of genre and should be related to average rating/impression of channel as per report submitted by BARC.

Language	WEEK-27			WEEK-30			WEEK-31		
	WK-27	% of Contr	Total %	WK-30	% of Contr	Total %	WK-31	% of Contr	Total %
Assamse	65890	0%	1%	60837	0%	1%	65498	0%	1%
Assamse News	55421	0%		63511	0%		63126	0%	
Bangla	728237	3%	4%	740712	4%	4%	814271	4%	4%
Bangla News	94545	0%		114412	1%		98513	0%	
Bhojpuri	186345	1%	1%	215482	1%	1%	208423	1%	1%
English News	1964	0%	0%	1896	0%	0%	1811	0%	0%
English Business News	1049	0%		312	0%		417	0%	
English GEC	529	0%		419	0%		390	0%	
English Movies	6607	0%		6764	0%		6007	0%	
Gujarati	91857	0%	0%	97914	1%	1%	133258	1%	1%
Business	3254	0%	0%	3226	0%	0%	3740	0%	0%
Hindi GEC	4639242	22%	37%	5149174	27%	40%	5376666	26%	40%
Hindi Movies	2626059	13%		2373344	12%		2339232	11%	
Hindi News	435847	2%		194124	1%		547239	3%	
Infotainment	12950	0%	0%	13797	0%	0%	13732	0%	0%
Kids	441106	2%	2%	411245	2%	2%	428685	2%	2%
Lifestyle	2735	0%	0%	3955	0%	0%	3556	0%	0%

Kannada	1196387	6%	7%	1259245	7%	8%	1294167	6%	8%
Kannada News	202394	1%		341074	2%		308338	1%	
Malayalam	602005	3%	3%	612659	3%	4%	649068	3%	4%
Malayalam News	83537	0%		107639	1%		78714	0%	
Marathi	1050303	5%	6%	1020389	5%	6%	1066264	5%	6%
Marathi News	193660	1%		172358	1%		235372	1%	
Music	597271	3%	3%	630723	3%	3%	606175	3%	3%
Oriya	335409	2%	2%	398296	2%	2%	408687	2%	2%
Odisha News	59284	0%		52424	0%		58098	0%	
Punjabi	139801	1%	1%	147318	1%	1%	141997	1%	1%
SPORTS	2442477	12%	12%	311335	2%	2%	352048	2%	2%
Tamil	2138691	10%	11%	2087259	11%	11%	2113844	10%	11%
Tamil News	112391	1%		109516	1%		104741	1%	
Telegu	2046875	10%	11%	2186816	11%	12%	2268975	11%	15%
Telegu News	192551	1%		198372	1%		771132	4%	
Youth	80890	0%	0%	65938	0%	0%	60792	0%	0%
	20867563	100%		19152485	100%		20622976	100%	

- *In this Hindi has maximum contribution rest of the genre are not contributing in even two digits.*
- *From above Table- A we can conclude the mass channel is Hindi GEC followed by Hindi Movies.*
- *Like any other business GEC channel is mass consumption and hence we have to offer cheaper rates for these channels which a subscriber can afford.*
- *We suggest to separate measurement should be taken for regional channels and it should be as per the same pattern of National channels.*
- *In this BARC rating should be taken as reference point as broadcaster is party to it and they don't have option to deny/debt on this.*
- *Any other methodology like taking certain percentage of universe will again give in roads to penetrate the channel by offering heavy discount and burdening the consumer.*
- *Few broadcaster/platforms will say above certain threshold of penetration the channel will be part of bouquet or may not be part of the bouquet in that case again with understanding between platform and broadcaster things can be presented in such away that consumption is more.*

Q4. Is there a need to review the cap on discount permissible to DPOs while forming the bouquet? If so, what should be appropriate methodology to work out the permissible discount? What should be value of such discount?

- *No, if we adopt above mentioned pricing mechanism in that scenario, we don't have to offer any discount from DPO level as pricing will be regulated on its own and customer will have liberty to pick up and choose channels of their choice.*

Q5. What other measures may be taken to ensure that unwanted channels are not pushed to the consumers?

The alternative method to prevent unwanted channels to the consumer is limiting the size of bouquets.

- *Number of bouquets offered by broadcaster should be in the ratio of 2:1 i.e. it should corelate with number channels available. For example, If X broadcaster has 8 channels then he should be limited to form only 2 Bouquets at the same time number of channels should be limited in that bouquet and maximum permissible channels offered should not be more than 4 channels of different genre **(Not of the same Genre)***
- *As the bouquet is limited to 4 channels of different genre no channel of same genre should be repeated. Only one channel of any genre.*
- *In case if the broadcaster is willing to form bouquet of more than 4 channels then slab wise discount should be offered. The principle of this should be in such away that as number of channels in bouquet is directly proportional to percentage of discount*
- *Example: -
Below mentioned is just example*

Sr.No.	No of channels	% Discount on bouquet pricing	
1.	4 channels	No discount	
2.	5 Channels	50%	
3.	6 Channels	55%	
4.	7 Channels	60%	
5.	8 and above channels	75%	

- *The channels which are priced above Rs.19 Should not be a part of any bouquet.*
- *By doing so regulator is also giving freedom to broadcaster to offer various bouquets.*
- *Regulator should have both capping maximum rate of channel is Rs.19/- and Minimum should be Rs.1/-Any channel which is priced less than Rs.1 will be FTA Channel.*
- *The minimum rate of channel should be Rs.1 per subscriber so that the staggering of channel will not happen and curtail the size of bouquet.*

Q6. Do you think the number of bouquets being offered by broadcasters and DPOs to subscribers is too large? If so, should the limit on number of bouquets be prescribed on the basis of state, region, target market?

- Yes, at present there are lots of bouquets available from broadcaster as well as DPO platforms which is creating confusion and platform are offering bouquet with unwanted channels and forced on consumers.
- By taking above sr.no.5 into consideration it will automatically downsize the number of channels offered in the bouquet.

Q7. What should be the methodology to limit number of bouquets which can be offered by broadcasters and DPOs?

- Establish the ratio between number of channels and bouquets offered Limit number of bouquets vis -a-vis number of channels offered by bouquet and this should be in the ratio of 2:1.
- Limit the number of channels offered in one bouquet it should be maximum 4 channels of different genre.
- No channel of same genre should be not repeat in this.
- Another suggestion is minimum rate of channel should be Rs.1/-

Q8. Do you agree that price of individual channels in a bouquet get hedged while opting for a bouquet by subscribers? If so, what corrective measures do you suggest?

Yes, Complete disparity in pricing of ala-a -carte channels and bouquet rate is roadblock to pick up individual channels on ala-a-carte basis.

- The fundamental business equation is the product of mass consumption should be affordable and cheaper in this case is exactly opposite. The channels which has maximum viewership has priced very high.
- The other alternative method is to corelate pricing with its viewership as per the published data of BARC on weighted average basis.
- However, for calculation purpose we can take average data for last one year and accordingly.

Q9. Does the ceiling of Rs? 19/- on MRP of a a-la-carte channel to be part of a bouquet need to be reviewed? If so, what should be the ceiling for the same and why?

Yes, Channels which is priced above Rs.10 should not be part of bouquet.

This Rs.19/- has derived from sports ($Rs.15.12 * 1.25 = 18.89$) the consumption of sports is on event based so it will not be appropriate to take Sports as an example.

And to the certain extent for sports channels is correct also as sports property is very expensive

Q10. How well the consumer interests have been served by the provisions in the new regime which allows the broadcasters/Distributors to offer bouquets to the subscribers?

- Consumer interest is not served as a matter of fact consumer end up paying more monies for lesser channels in comparison with earlier regime.
- No freedom of selection of individual channels is available in NTO.
- HD pricing is very high and which lead to lesser penetration of HD boxes

In the universe 160 Million only 10 Million consumers have opted for HD set top boxes and this number will also reduce due to churn if broadcaster continue with same pricing and same should be relooked into.

- *HD pricing should be equivalent to SD pricing so that more people can afford HD channels and viewing quality standard will be high.*

Q11. How this provision has affected the ability and freedom of the subscribers to choose TV channels of their choice?

- *At present there is limited provision to select the individual channel due high pricing offered by broadcasters for ala-a-carte channels.*

Q12. Do you feel the provision permitting the broadcasters/Distributors to offer bouquets to subscribers be reviewed and how will that impact subscriber choice?

- *Definitely it should be reviewed and if the pricing is in line with requirement of the market then more option will be available to select the channels as per the consumers interest.*
- *Existing regime doesn't offer any relief to Phase-III and Phase-IV market where ARPU has gone up and they are contributing 50% of the universe.*
- *For phase -III and IV ARPU has gone up and number of channels has been reduced.*

Q13. How whole process of selection of channels by consumers can be simplified to facilitate easy, informed choice?

- *Suggested few models like Ad based channel with capping of discount and Ad free channel without capping of discount.*
- *Limit number of bouquets offer in comparison with number of channels offered it should be in the ratio 2:1*
- *Bouquet should not be more than 4 channels in case broadcaster wish to add more than 4 channels in a bouquet then discount should be offered in slab wise manner.*
- *Minimum rate of channel should be Rs.1*
- *The above majors will make rates affordable and realistic and will have long term gain.*

Q14. Should regulatory provisions enable discount in NCF and DRP for multiple TV in a home?

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Q15. Is there a need to fix the cap on NCF for 2nd and subsequent TV connections in a home in multi-TV scenario? If yes, what should be the cap? Please provide your suggestions with justification.

- *Yes, but how to identify is big challenge*

Q16. Whether broadcasters may also be allowed to offer different MRP for a multi-home TV connection? If yes, is it technically feasible for broadcaster to identify multi TV connection home?

- *No, it will create lot of confusion and will be more complicated for IT for billing purpose.*

Q17. Whether Distributors should be mandated to provide choice of channels for each TV separately in Multi TV connection home?

Q18. How should a long-term subscription be defined?

- *Minimum 6 months should be defined as long term subscription.*

Q19. Is there a need to allow DPO to offer discounts on Long term subscriptions? If yes, should it be limited to NCF only or it could be on DRP also? Should any cap be prescribed while giving discount on long term subscriptions?

- *No discount should be offered on subscription. However on NCF they can offer discount but it should not be more than one-month NCF payment that too in the form of offering of channels or bouquet of their choice .*

Q20. Whether Broadcasters also be allowed to offer discount on MRP for long term subscriptions?

- *Yes, subjected to offering of channels.*
- *What if broadcaster discontinue the transmission of channel?*
- *If it is part of bouquet then propionate amount will be adjusted/credit should be given for equivalent amount.*

Q21. Is the freedom of placement of channels on EPG available to DPOs being misused to ask for placement fees? If so, how this problem can be addressed particularly by regulating placement of channels on EPG?

Yes, it needs following matrix to calculate for the placement fees.

<i>Particulars</i>	<i>Basic Multiplier</i>	<i>DAS-I</i>	<i>DAS-II</i>	<i>DAS-III</i>	<i>DAS-IV</i>
<i>Universe of target market</i>					
<i>Genre of channel</i>					
<i>Average Rating of channel as</i>					

per BARC range					
Channel Position required by broadcaster					

- This matrix needs to be well discussed and formulated.
- Platform should be reasonable in demanding the placement fees. At present they are asking for flat rate which needs correction.
- GEC channel gets more viewership and in turn they get more advertisement revenue. However, English cluster needs investment and they get limited eyeball and advertisement revenue is minuscule.

ISSUES RELATED TO CARRIAGE FEES

- For any new entrant channel, Platform/DPO should not ask for any carriage fees for at least 3 months as this is major hurdle in getting entry for quality international channel and most of the foreign broadcaster are reluctant to enter into Indian Market because of high investments and low returns.
- The international channels (Definition channels of foreign origin which is already available overseas for last 5 years/3 years) should not be charged any carriage fees and it should have waiver for up linking and downlinking fees as one year to boost this media sector. So more channels will come to India and job opportunity will be created as today due to merger and acquisition people from all the sector are without job or jobless.
- If we allow additional international channel then platform will be competitive with IPTV channels and more jobs will be created.
- At present due to consolidation of networks/merger media industry is going through very bad phase.
- Carriage fees or placement fees for international channel is major concern as these are niche channels and they have last preference.
- First preference from consumer side is always Hindi, second is Native language and third and last is English.
- However, International channels with English subtitle/dubbing should not be part of this special promotion

Q22. How the channels should be listed in the Electronic Program Guide (EPG)?

- This should be language followed by genre wise.
- It should be uniform across all the platforms.
- In case of regional channels native language and genre should come first

Q23. Whether distributors should also be permitted to offer promotional schemes on NCF, DRP of the channels and bouquet of the channels?

- Yes, Especially in new channels/international channels

Q24. In case distributors are to be permitted, what should be the maximum time period of such schemes? How much frequency should be allowed in a calendar year?

- *It should be free for first 3 months and later on as per the rate published by broadcaster*

Q25. What safeguards should be provided so that consumers are not trapped under such schemes and their interests are protected?

Q26. Whether DPOs should be allowed to have variable NCF for different regions? How the regions should be categorized for the purpose of NCF?

- *Rather than regions it should be as per the DAS Market Site. DAS-I to IV.*
- *Geo fencing of STB will be a problem and monitoring will be very difficult*

Q27. In view of the fact that DPOs are offering more FTA channels without any additional NCF, should the limit of one hundred channels in the prescribed NCF of Rs. 130/- to be increased? If so, how many channels should be permitted in the NCF cap of Rs 130/-?

- *Rs.130 is for 150 channels should be sufficient which includes DD channels*

Q28. Whether 25 DD mandatory channels be over and above the One hundred channels permitted in the NCF of Rs. 130/-?

- *Yes, DD rating/viewership is very poor so it should be omitted from first 100 Channels*

Q29. In case of Recommendation to be made to the MIB in this regard, what recommendations should be made for mandatory 25 channels so that purpose of the Government to ensure reachability of these channels to masses is also served without any additional burden on the consumers?

- *In this region wise placement of DD channels should be offered.*
- *However, DD National, DD sports and other important channel which DD feels should be part of the national bouquet and must carry which will free the bandwidth of channels enabling more channel to accommodate from cable Tv point of view so that channel carrying capacity will be increased for the platform and can be used in effective way for some other channels.*
- *If anybody wants any other regional DD channel over and above-mentioned channels then he can always demand to service provider.*

Q30. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

- *Almost all the leading broadcaster has their own streaming service platform for example HOT STAR, Sony Liv, ZEE5, Voot.*
- *For these platforms the same content is available over and above this they have premium content which is superior than the linear content.*
- *Entire content is offered at lesser price or free in comparison with existing price structure offered to all rest of digital platform.*

- *This may not be affecting in short term but however is going to impact in major way and will have long term effect for DPO platform.*
- *From broadcaster point of view is B2C however for platform it is alarming stage.*