

CABLE OPERATORS SANGRAM COMMITTEE

2, RADHA GOBINDO LANE

KOLKATA – 700028

WEST BENGAL

Date: - October 4, 2019

To,
Shri Arvind Kumar,
Advisor (B&CS),
Telecom Regulatory Authority of India,
Jawahar Lal Nehru Marg,
New Delhi - 110 002

Subject: Counter Comments on the issues raised by “PRASAR BHARATI” in the Consultation Paper on "Tariff related issues for Broadcasting and Cable services"

Dear Sir,

Goaded by compelling circumstances we the unified forum of the Cable Operators of West Bengal is going to encroach upon your precious time from your daily busy schedule.

At the very beginning of this appeal, we want to draw your kind attention to the Comments on Consultation Paper on Tariff related issues for Broadcasting and Cable services of Prasar Bharati vide File No: P-11013(59)/2019-Ops. We wish to put on

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record our apprehensions regarding the outcome, if the proposal of Prasar Bharati executed.

The said proposal is hereunder for your ready reference:

“Further, since the STBs are not yet technically interoperable, Prasar Bharati is of the view that in case a subscriber does not renew its subscription, the notified channels should continue to be available to such subscribers in order to benefit the subscribers to avail public broadcasting services. This will ensure dissemination of any information of national importance to the subscribers, whether his connection is active or not at that time.”

“There is perhaps no need to recommend to the Ministry for any change at this stage, as in the consultation paper itself the Authority is of the view in Para 4.27 that there is no additional cost associated in providing mandatory channels by DPOs, therefore, all these channels should be provided to all the subscribers at all the times, free of charge in national interest. These channels should be excluded while calculating NCF, as these are mandatorily to be provided to the subscribers.”

In the context of the comments of Prasar Bharati it can be said that, to deliver the channels of Doordarshan, the connection of the Subscribers must be maintained in good working conditions without any service charges.

Moreover as an instance if a Subscriber opted Cable TV connection with desire package and/or Channels even for a

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month, then the LCOs have to maintain that connection to allow mandatory channels of Doordarshan to the Subscriber without any remuneration forever.

On the other hand, you kindly consider the following burden of cost to the LCOs per Set Top Box per month to continue mandatory channels of Doordarshan without charge, such as;

1. Systematic Service & maintenance of Network.
2. More than a few License Fees.
3. Taxes.
4. Depreciation of Cable TV wire.
5. Depreciation of Cable TV Hardware.
6. Maintenance of office & Staff.
7. Recharge for Demonstrations.
8. Telephone & Electricity Bill.
9. Donation. Etc.
10. Unrealized amount from Subscribers.

With the features of the above it can be said that. Any type of services normally provided for remuneration, because one does almost anything to earn their **bread and butter** in this cold-

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hearted world. In due course, the LCOs will failed to provide service support to their total Subscriber base without remuneration, as well as LCOs would lose their interest to business.

It is known that “service without service charge” earned flabbiness, unwillingness, inattention to professions. “Service without service charge”, to the business of LCOs even for single-channel, will create chaos and disrupt the smooth functioning of Cable TV business across the country and lead to unnecessary litigation between LCOs and Subscribers, and will generate, emptiness.

Considered a beneficial payment, to continue and /or maintain mandatory channels of Doordarshan to the viewers are meant for the benefit of the LCOs of the Cable TV Industry.

The service charge might be imposed for mandatory channels of Doordarshan and the same is clearly included as a separate heading in the bill as a charge not as a tax to decrease the financial burden to the viewers. Thus, there is complete transparency with regard to the amount, the rate and the purpose of the charge.

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Furthermore, to ensure reachability of Doordarshan channels without any additional burden on the consumers the mandatory channels require decreased in number as the previous epoch of Cable Television.

More so ever the logic of transmission of the Doordarshan channels would be consistent if the channels serve on regional basis because the languages are different in the different region. To follow the transmission of Doordarshan channels on regional basis then the acceptance of DD Channels will increase as well as Subscribers also will be facilitate to continue their habit of viewing of DD Channels.

LCOs are levying service charge to accommodate service to the Subscribers are an established practice since the inception of the Cable TV Industry .It should be noted that most of the money collected under the head of the Service charge goes to the maintenance work. Discontinuation of the same at this stage will adversely affect millions of LCOs, and therefore you kindly plan to continue levying the service charge as before.

However, any attempt to implement such a proposal of Prasar Bharati not only ultimately leads to revenue loss of LCOs but also loss to the Government exchequer.

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In the issue of the aforementioned proposal of Prasar Bharati you kindly consider the status quo of LCO's. Our unrest request to you to kindly don't take such steps recommended by Prasar Bharati, favouring with the LCO's to run the Cable TV business in future in view of the hike of price of living cost.

In view of the previously mentioned teething troubles, we have no other alternatives to but to bring in before you and try to take into sight of proper authorities for perfect solution. Otherwise, the LCOS who are the main workmanship of Cable TV will have no other alternatives but to leave the business field of Cable TV. Particularly the present revenue sharing to the LCOs is more than enough to create a crisis, which may lead to improper service to severe Subscribers, and put the lives and liberty of thousands of cable operators along with their staff in danger on the way of unemployment.

Cable Operators Sangram Committee support and shout in favour of inception and implementation of DIGITAL ACCESS SYSTEM and always uphold the interest of the Subscribers as well as the thinking, recommendations and guidelines of TRAI

CABLE OPERATORS SANGRAM COMMITTEE

2, RADHA GOBINDO LANE

KOLKATA – 700028

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regarding the DIGITAL ACCESS SYSTEM. However, we compel to protest against the proposal of Prasar Bharati where they have taken programs to continue Cable TV connection with desire package and/or Channels even for a month, then the LCOs have to maintain that connection to allow the Subscriber mandatory channels of Doordarshan without any remuneration forever. ,

We hope sufficient information you meet from the aforesaid statements from our end, and we believe you should extend your hands of cooperation and effort to the Cable TV Operators to get to the bottom of the present challenging situations.

Thanking you in anticipation and hope to favoured by your kind consideration as well as valued support.

Thanking you once again.

Sincerely Yours

APURBA BHATTACHARYA

SECRETARY

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