

CABLE OPERATORS SANGRAM COMMITTEE

2, RADHA GOBINDO LANE

KOLKATA - 700028

WEST BENGAL

Date 23 September 2019

To,

Shri Arvind Kumar, Advisor (B&CS)

& Shri V.K.Agarwal, Jt Advisor (B&CS)

Telecom Regulatory Authority of India

Mahanagar Door Sanchar Bhawan, New Delhi

Dear Sirs,

Sub: - Comments on Consultation Paper on Tariff related issues for Broadcasting and Cable services.

At very inception, we the Association of Cable TV Operators of West Bengal take this opportunity to congratulate you to allow us with the chances to place observation from the end of LCOs on the various issues of Consultation Paper on Tariff related issues for Broadcasting and Cable services 16 August 2019.

Before register, our comments on the Consultation Paper on Tariff related issues for Broadcasting and Cable services 16 August 2019, there is a feeling that the architecture of today's Cable TV Industry Local Cable Operators (LCO) will soon witness sufficiently with the episode of losing their income and business built up by them over a period of 30 years. The reasons behind our apprehensions are the huge reduction in the percentage of present revenue as well as the current Indian inflation rate.

According to "The Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017 & the Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff Order, 2017 & the Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations, 2017", as treated as the most neglected part of the Industry there is no provision not even pronounced a single word about LCOs. No service charge allotted against their day-to-day

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service to the Subscribers. When it expected that LCOs will be provided with the 100% NCF (**Network Carriage Fee instead of Network Capacity Fee**), since the contents of broadcasters and MSOs are carrying with the help of respective CATV Network of the LCOs around the Country. astonishingly the only earning in the name of Network Capacity Fee (NCF) also compelled to share with the MSOs.

Provide & Secure 100% NCF (Network Carriage Fee instead of Network Capacity Fee) to LCOs.

From responsible activities to high tech initiatives, LCOs have clearly exhibited their ability to make a significant difference to the present million-dollar industry and improve the overall quality of service. On behalf of LCOs our humble appeal to TRAI that the most important requirement is the sufficient inclusion of the responsibility, status quo of LCOs in the Tariff Structure.

Status quo of Local Cable Operators (LCOs) in the Tariff Structure.

We the LCOs are very much fortunate that after all TRAI has realized the ambiguities of NTO and floated a revised consultation; our comments on the consultation paper are as follows,

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, we agree that the 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.

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Even though the Hon'ble Madras High Court had set aside the 15% discount cap on bouquets, the Hon'ble Supreme Court had upheld the TRAI's powers to formulate pricing for TV content. The Broadcasters has taken the advantages the policy to wait and watch before implementing the bouquet cap. The flexibility available to broadcasters benefitted them to push their channels to consumers and misused the essence of NTO.

15% cap on the discounts on bouquets of the broadcasters should implement with immediate effect, the implementation may be done with the following considerations,

- i) Implementation of 15% capping on bouquets with immediate effect.
- ii) The updated status report of M-PMR, Q-PMR will prove whether the discount on the sum of a-la-carte channels forming part of bouquets has been misused to push their channels to consumers.
- iii) The rate of discount on bouquets should be allowed especially to the a-la-carte driver channels to encourage subscribers.
- iv) The bouquet and a-la-carte pricing should in a manner, where both will attract the customers to choose either bouquets or the a-la-carte channels.

Broadcasters can offer on its bouquet of channels over the sum of MRP of all the pay channels in that bouquet. This essentially meant that the price of bouquet would only become marginally lower than the sum of a-la -carte prices of driver channels. This will help to choice through a-la -carte offer and prevents skewed a-la-carte and bouquet pricing indicates that in absence of any restriction on the discount on the offering of bouquets; broadcasters are making

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prices of a-la-carte channels illusory thereby influencing the a-la-carte choice of channels by consumers.

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 broadcasters?

Yes obviously, because the smaller broadcasters are at the disadvantageous situation for their channels not find placement in DPO packs only get a-la-carte choice. Non-implementation of 15% cap on discount is the root cause of this problem.

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 a need to reintroduce a cap on discount on sum of a-la-carte channels forming part of bouquets while forming bouquets by broadcasters.

The 15% capping is required to implement to protect the interest of the Subscribers otherwise the absence of 15% discount cap, the broadcasters will continue to offer incredible discounts on pricing of bouquets in comparison to the a-la-carte pricing of pay channels, ultimately the result is, the Subscribers will be forced to accept the non-driver channels of the Broadcasters.

The broadcasters not cleared the type of discount they offered such as,

1. Quantity Discounts
2. Trade Discounts
3. Promotional Discounts
4. Seasonal Discounts

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5. Cash Discounts

6. Geographical Discounts.

The broadcasters did not also mention the period of the discount.

In this case, to reintroduce the discount, broadcasters have to disclose their process of the discount they are following to the bouquets and the difficulties to follow to allow same amount of discount to the a-la-carte channels. It is obvious that uniformity to the cost of bouquets and a-la-carte channels will evidence the adequacy, acceptability, and potentiality of the channels.

The absence of 15% cap likely to compel subscribers to choose the bouquets offered by Distribution Platform Operators (DPOs) or broadcasters.

This dilutes the core objective of consumer choice to a certain extent- with entities, especially the larger players in the value chain continues to bundle channels as they did pre-NTO.

Implementation of 15% capping on bouquets

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 need to review the cap on discount permissible to DPOs while forming the bouquet. Seeing that the permissible discount on cap neither implemented nor verified, before the accomplishment as well as confirmation of the outcome of discount permissible to DPOs there is no need to review the cap on discount.

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The NTO (NEW TARIFF ORDER) has given the flexibility of a formation of a bouquet to the DPOs. The power of formation of bouquet either with Pay or with FTA Channels, truly misused by DPO by having their preferred channels in most of the bouquets; many bouquets have been pushed to consumers with mandate simply ignoring their specific choice.

It is better to bring to an end the permission to forming the bouquet, when there will be no permission to forming the bouquet then the question of discount does not arise.

Q 5. What other measures may be taken to ensure that unwanted channels are not pushed to the consumers?

Withdrawal of the permission to forming the bouquet the only measure to ensure that unwanted channels are not pushed to the consumers.

The Subscribers are the perfect assessor of the unwanted, unnecessary, unacceptable channels, and if they get chance to review properly on an a-la-carte basis. However, consumers are being pushed with driver and non-driver channels on the process of packaging; In this case, broadcasters can only clear the parameter of the packaging of the driver and non-driver channels they are maintaining.

The subscription fees are deteriorating only for consumer's unwillingness to accept huge number of undesirable channels as the consumer's choice wanders around in few favorites TV program like popular serial, news, or sports at the time of particular events. In contrast, for families consuming a varied type of content depending on the interests of different family members, channels need to be wisely chosen, only then will the NTO be favourable.

Q6. Do you think the number of bouquets being offered by broadcasters and DPOs to subscribers is too large? If so, should

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the limit on number of bouquets be prescribed on the basis of state, region, target market?

Yes we think the number of bouquets being offered by broadcasters and DPOs to subscribers is too large in number.

Based on the consultation paper some major broadcasters have declared 97, 86, 26, 93 and 29 bouquets while the numbers of channels uplinked by them are 57, 59, 33, 74 and 29 respectively. This has forced consumers to adopt some suggested packs of TV channels.

Surely there should be the limit on number of bouquets be prescribed on the basis of state, region, target market because many of bouquets contain very similar set of channels, with very few changes. This too many bouquets are not only creating confusion among consumers but also becoming a hurdle in choosing the channels by consumers. With too many bouquets of broadcasters and DPOs, the consumers are confused and as a result forced to adopt some suggested packs of TV channels, which kills the freedom given to consumers at NTO.

The best way is to put an end to the Bouquet system and allow the Subscribers to choose their favourite channels on the a-al-carte basis.

Require to eradicate the Bouquet System, and permit Subscribers to choose channels on the a-al-carte basis.

We want the liberty of formation of bouquet by Broadcasters or DPOs should withdraw, as the main objective of NTO was to uphold the interest and choice of the Subscribers.

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The freedoms of formation of excessive number of bouquets are not only creating confusion to the Subscribers but also annihilate the essence of NTO.

Q.8 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?

As Association of LCOs we agree that the price of individual channels in a bouquet get hedged while opting for a bouquet by subscribers. It is difficult to convince the Subscribers with the huge variation of the price of individual channel with the price of package as well as Subscribers deny accepting few channel in exchange of a penny included to the package.

The process of packaging may be pending for next consultation paper of TRAI. By this time, it will be easier to assess the potentiality of the channels based on the acceptance of the Subscribers.

Q.9 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?

If there absence of permission or no provision of package and/or bouquet system, the question of need to review of the ceiling of Rs. 19/- on MRP of a-la-carte channel to be part of a bouquet will be irrelevant.

Once there are no packages and/or bouquets, ceiling of Rs 19 is insignificant.

comparing the distribution of all pay channels over MRP (price) intervals before and after the new regulations demonstrates the fact

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that channels are now concentrated in the Rs. 0-2 price range (some converted from FTA to pay) and at the Rs. 19.00 price point.

The spread of the distribution of channels reduced compared to the distribution of the 2017 rates. However, the bunching of channels at the start and end of the bouquet range is not a uniform trend.

The reason to withdraw the system of bouquet is that the broadcasters are pricing their driver channels at the threshold price of Rs. 19.00 or close to it purely based on commercial considerations.

Out of the existing 330 pay channels, 94 pay channels have been priced lower than or equal to Rs 1.00. These channels are generally less popular channels and many of them are recent converts from FTA to pay so that it could be included in a bouquet.

Q.10 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?

NO BOUQUETS system will serve better to the consumer interest by the provisions in the new regime. Because the Broadcasters or MSOs are following the way of banqueting only to compel the Subscribers to encompass the mixture of useless, unnecessary, unrequited, extra channels with disproportionate amount and then the Customers complain of **INCREDIBLY HIGH BILLING** , the LCOs are suffering with the reflection of exasperations of the Subscribers .

Q.11 How this provision has affected the ability and freedom of the subscribers to choose TV channels of their choice?

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For the Subscribers the provision of packaging not only affected the ability and but also hampered the freedom of the subscribers to choose TV channels according to their choice. Because at the post NTO situations, the Subscribers were at liberty to enjoy the Channels avoiding any troubles of choosing Channels individually or as a bouquet for the sake of entertainment.

The NTO allows the Broadcasters/Distributors, to offer bouquets to the subscribers but it helps them to ignore the consumer interests which is currently in abeyance, This has rendered the TRAI's objective of offering choice to consumers meaningless since consumers are forced to take bouquets, mysteriously MSO compelled the Subscribers to accept their packages instead of al-a-carte channels.

The main issues that the mismatch between a la carte and bouquet pricing. The existing regulation has a clause that caps the discount on bouquets offered by the broadcaster at 15%.

The clause mandates that the MRP of a bouquet formed by a broadcaster should not be less than 85% of the sum of MRPs of the a-la-carte pay channels forming part of that bouquet.

Whereas a la carte price of popular channels priced closer to the channel cap of Rs 19.00. Mysteriously the composition of such a-la-carte pay channels allowing huge discount to a particular bouquet.

Q.12 Do you feel the provision permitting the broadcasters/Distributors to offer bouquets to subscribers be reviewed and how will that impact subscriber choice?

Yes we fill the provision permitting the broadcasters/Distributors to offer bouquets to subscribers be reviewed, because The flexibility was misused to regulate the TV channel prices by giving huge discounts on the bouquets and create impact on subscriber choice.

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With the help of last six months experience, it can say that Subscribers are very much interested with the choice of individual a-la-carte pay channel instead of the content of unnecessary pay Channels on the packages.

Subscribers are interested with a-la-carte pay channel instead of bouquet of pay Channels.

Q.13 How whole process of selection of channels by consumers can be simplified to facilitate easy, informed choice?

Neither any permission nor any provision of bouquet and/or package system as well as independence to choose al-a-carte channels can only simplify Consumers to facilitate of selection of channels.

The whole process of selection of channels by consumers will be friendly when there will be parity with the price of channel and price of the bouquet.

Presently the gargantuan variation of price of different channels of the same broadcaster is simply proving that broadcasters are known either best that the lower priced channels are not accepted to the Subscribers or the channels are not worth to transmit.

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

No regulatory provisions require enabling discount in NCF and DRP for multiple TV in a home by any DPO. It is necessitate to ensuring a **level playing field** to all the competitors and all would have a fair chance of succeeding. If there, have a **level playing field** in terms of opportunities to all the stake holders to excel and succeed.

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Any type of discount in NCF should not allow guaranteeing a level playing field.

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.

There is no need to fix the cap on NCF for second and subsequent TV connections in a home in multi-TV scenario because the MRP of NCF already fixed and the LCOs earn a tiny amount after sharing the NCF with the MSOs.

If discount allowed for second and subsequent TV connections ignoring the LCOs earning after NTO, then the service support to the Subscribers from the end of LCOs will be disadvantaged mostly.

Fix cap on NCF, will hamper the interest of a level playing field.

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?

The Broadcaster can only provide their suggestion.

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

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Yes there must be mandated to provide choice of channels for each TV separately in Multi TV connection home. Without any mandate, the Subscribers will be compelled to access the channels to the second and subsequent STB similar to the first STB.

Since the inception of CATV Digitization Subscribers are habituated with the provision of the choice of channels for each TV separately in Multi TV connection home.

Q.18. How should a long-term subscription be defined?

Long-term subscription model may be defined as a subscription-based pricing model is a payment structure that allows a customer or organization to purchase or subscribe to a services for a specific period for a set price. Subscribers typically commit to the services on a monthly or annual basis.

With dynamism, adjusting pricing and packaging is the surest way to attract and retain customers, transitioning from an uninterrupted to a subscription model likes the post NTO scenario.

Q.19 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 need to allow DPO to offer discounts on Long-term subscriptions, because the discount will badly influence on the percentage of NCF allowed to the LCOs. The inadequate NCF is the only source of revenue of the LCOs to up-gradation and regular maintenance of network.

If discount on long-term subscriptions prescribed with or without cap then there will not have a **level playing field** in terms of opportunities to excel and succeed.

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Discount on long-term subscriptions would provide advantages to the big players over the small players, as well as will not ensure a solid level playing field in terms of fairness.

Q.20 Whether Broadcasters also be allowed to offer discount on MRP for long term subscriptions?

No, there is no need to allow offering discount on MRP for long-term subscriptions, for the reason that already we have gained sufficient knowledge on incredible discount, broadcasters allowed. They will start again the same episode following the way of the discount on MRP for long-term subscriptions.

set of rules would provide a level playing field to all .

Q 21 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?

“Placement of channels on EPG available to DPOs” ----- are the subject of MSOs, as an Association of LCOs we have no function to comments on this point.

Q 22 How the channels should be listed in the Electronic Program Guide (EPG)?

Same as Q 21

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Q 23 Whether distributors should also be permitted to offer promotional schemes on NCF, DRP of the channels and bouquet of the channels?

No, there is no need of permission of any discount in whatever the name on NCF, DPR of the Channel. This will ultimately affect the LCOs because the percentage of NCF to the LCOs are as low as the proverb said, **“after meat comes mustard”**.

It is better to create a situation where everyone has the same opportunity. If started with a **level playing field**, everyone would have an equal chance.

No scheme or discount on NCF (Network Carriage Fee instead of Network Capacity Fee), secure 100% NCF (Network Carriage Fee instead of Network Capacity Fee) to the LCOs.

Q 24 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?

Such a scheme would not only be dangerous to the downtrodden but also to the marginalized sections of the industry, otherwise they would not be able to compete on a **Uneven playing field** with the big players.

Level playing field is the survival of every single one player.

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Q 25. What safeguards should be provided so that consumers are not trapped under such schemes and their interests are protected?

If there is, no permission to provide any discount whatever the name it may be, then there will be no provision to trap the consumers. It would be better to produce a situation such as a **level playing field** where everyone has the same opportunity; everyone would have an equal chance.

Q 26 Whether DPOs should be allowed to have variable NCF for different regions? How the regions should be categorised for the purpose of NCF?

DPOs should never be allowed to have variable NCF for different regions because there will be a chance of confusion and dissatisfaction of Subscribers of the adjacent part of two regions will affect the objective.

Q 27 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/-?

Hence, there is no need to increase the existing NCF of Rs.130.00 Particularly when the free to air (FTA) channels are 573 in number at present. The NCF may be accommodating with the following slab system.

Sr.No.	No. of FTA Channels	NCF	GST	TOTAL
1.	100	Rs.100.00	Rs.18.00	Rs.118.00
2.	125	Rs.125.00	Rs.22.50	Rs.147.50
3.	150	Rs.150.00	Rs. 27.00	Rs.177.00

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Due to the unidentified reason, the competition among the MSOs to offering more FTA channels without any additional NCF. Absence of regulations will not be able to restrict them to stipulate within a fixed number FTA channel.

Q 28 Whether 25 DD mandatory channels be over and above the One hundred channels permitted in the NCF of Rs. 130/-?

Yes DD mandatory channels should be over and above the One hundred channels permitted in the NCF of Rs. 130.00. Because 26 mandatory DD Channels out of 100 Channels at the cost of Rs.130 NCF that is NCF Rs. 1.30 per channel, the Subscribers are paying 26% NCF to know only in the news of their own country.

Q 29 In case of Recommendations 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?

To ensure reach ability of these channels without any additional burden on the consumers the mandatory channels should be decreased in number and **serve the DD channels regional basis** as the previous epoch of Cable Television.

Q 30 Stakeholders may also provide their comments on any other issue relevant to the present consultation.

We believe that this draft regulation, if implemented, will bring in path-breaking changes to the industry structure with a lot of transparency and non-discrimination. The Telecom Regulatory Authority of India's (TRAI) present proposal for the broadcasting and cable services tariff is a step in the right direction, but we feel some issues still need to be clarified.

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On the other, hand the main architecture, since 1990, the LCOs are responsible for creating this million dollars industry in the country, but the scopes of revenue of LCOs in the name of Network Capacity Fee (NCF) neither been satisfactory nor been appropriate to maintain livelihood. Along with the freedom of choice of Consumers, we request the authority as well as seeking **100percent Network Carriage Fee (NCF)** to protect the livelihood of thousands of Local Cable TV Operators.

NCF is the minimum ARPU, in the NTO regime, the ARPU is fixed, and only source of earning to the LCOs, the allowed NCF also shared with the MSOs at a high percentage, if this situation continues any more, then expected that the business of LCOs would wind up shortly.

It will be convenient as well as appropriate to fix the **100percent (NCF)** to LCOs as per the market assessment with the change in the name Network Carriage Fee (NCF) instead of Network Capacity Fee (NCF).

Network Carriage Fee (NCF) instead of Network Capacity Fee (NCF).

There was no such term like NCF existed and, LMO has nothing much to lose pre NTO scenario, surprisingly every LCO have lost at least 20-25% of their business for the implementation of NTO. As long as a subscriber receives a good quality of service; the customer does not have any issue and not care on the mode of entertainment. The subscribers habituated with paying as per view since the inception of Cable TV. After NTO the massive increase in payment for the sake of entertainment compared to the last 30 years being forced the subscribers either to compromise with huge financial burden or to turn away with the decision not to be entertained.

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The following example will provide a clear idea of enhancement of the Subscription after the new tariff regime,

	Before NTO	After NTO
Channels from all genres.	Around 300 channels, including free-to-air channels.	Less than 220 selected channels, including free-to-air channels.
Bouquet Price.	Rs300.00	Rs490.00
Percentage increase.	63.3%	

If we really care about the customer's sentiment then we will understand that the Subscribers were better with pre NTO scenario.

In the present NTO scenario, the two segments among the stakeholders are suffering as follows,

Sr. No	Segment	Post NTO scenario	Remarks
1.	Subscribers	Monthly bill hiked at least 35-50% .	Experiencing huge financial burden because of NTO.
2.	Local cable Operators	Monthly income reduced @ 60% .	Adapted with NTO but facing trouble to survive.

On the Pay Channels bouquets or al-a-carte channel, the 20% discount from the Pay Broadcasters are allowable to the MSOs, the share of LCOs on it is not only insufficient but also inappropriate and require reviewing.

The respective Cable TV Network of the LCOs in the different areas around in the country is the common path to carry the signal of MSOs and the Broadcasters. Astonishingly the LCOs are depriving economically as well as compelled to share NCF, and discount from the Pay Broadcasters.

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The Broadcasters are earning subscription of channels and/or bouquets and revenue of advertisements using the said network of the LCOs.

MSOs are paying NCF to LCOs at a low assortment for 100 FTA channels the 20% discount on the MRP of al-a-carte channels and/or bouquets of the Pay Broadcasters.

Moreover, Broadcasters are allowing incentives and extra 15% discount to the MSOs, but MSOs are not sharing the said incentive or extra discount with the LCOs even after using the entire Network of LCOs.

Moreover, to roll out NTO in the part of LCOs the expenses to provide satisfying service as well as to uphold the choices of the Subscribers significantly increase. **Considering the state of affairs of LCOs after NTO it is required to ensure 100% NCF to LCOs.**

Ensure 100% NCF to LCOs.

However, there is no incentive left for LMOs to really think and try to increase their cable TV numbers.

The most sensitive issue of NTO is 15% capping. The Broadcasters, using set up "TV Viewers" as substitutions and they are worried that their non-driver channels will throw out from inflated bouquets.

Broadcasters are frantic to force large bouquets of non-driver channels on viewers by using the facility of non-implementation of the bouquet cap that TRAI hoped they would voluntarily maintain. Inflated bouquets simply inflate the consumer's monthly bill. Channels, which should be free due to lack of viewership, priced at

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Rs 0.10 to Rs 1.50 and added to pay channel bouquets. The bouquet price will slash to low price when the price of the non-driver channels would be Zero.

On the other hand, the transmissions of popular Free to Air Channels without NCF on become Heaping of sorrow upon sorrow to the LCOs. This situation is creating terrible disparity not only on the common people but also ultimately lead to revenue loss to the Government exchequer

Once again, there is no recommendation to OTT/IPTV to the present Consultation Paper on Tariff related issues for Broadcasting and Cable services. Currently, OTT platforms are gaining popularity over the country, and OTT services in India are running with having about 40 OTT players, such as HOTSTAR, NETFLIX etc. Every OTT player is collecting payment as a subscription from a large no of viewers in exchange of subscription of a large amount. In comparison with the other stakeholders, the OTT apps do not have to pay any such charges or taxes. This, in turn, makes it financially easier for the OTT players to compete in the same market.

We hope TRAI is set to consider bringing **OTT media platforms under regulations** similar to those implemented in the DTH and Cable TV industry. The move could make OTT platforms follow similar rules and strategies as DTH and cable operators.

Without prejudice to our rights and contentions to the Consultation Paper on Tariff related issues for Broadcasting and Cable services of TRAI, we raise the issues to need consideration of the appropriate authorities.

Thanking You

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