



DMA Digital Private Limited.

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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.

Ans:

Yes, The flexibility on main controlling key factor of NTO has helped them to find a way around.

Remedials:

Separate channel need to be treated as individual and separate product hence no bundling of channels. A-la-Carte Channel pricing with proper cost evaluation.

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

Ans:

Yes, Most of the broadcasters declared overstated their channel a-la-carte rate and offered discount on case to case basis which has diluted the intention of level field by NTO.

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.

Ans:

Yes, it need to be reintroduced, It should be 15% flat and fixed which will bring transparency in this process so that none of the stake holders in this process principally gets affected.

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

Ans:

Yes, The presently permissible discount of 20% is not adequate and need to bring up to minimum 35%, flat discount on MRP without any broadcasting hidden terms and condition.

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

Ans:

Through Customer flexibility to pick the channels has already ensured the reduction of the channels.

Further ceiling on a-la-carte channel pricing with production cost evaluation and number of channels will address this issue significantly.

Q6. Do you think the number of bouquets being offered by broadcasters 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?

Ans:

Yes, It's too large for the customer to make the choice. Separate channel need to be treated as individual and separate product hence no bundling of channels hence no limits on number of bouquets need to be prescribed.

Q7.What Should be the methodology to limit number of bouquets which can be offered by broad casters and DPOs.

Ans:

Separate channel need to be treated as individual and separate product hence bouquet related question is not applicable. We have now enough customer choice data through which we can clearly analyze the customer choice and help them with those data .

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 suggested?

Ans:

Yes, Separate channel need to be treated as individual and separate product to eliminate this unwanted situation for sales of channels products.

Q9. Does the ceiling of MRP Rs. 19/- on MRP of 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.

Ans:

Yes, Ceiling should be reviewed based on the evaluation of production cost, distribution cost and the consumer buying capacity across the country.

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

Ans:

It has partly served the purpose of the urban customer as all the reports and data considered during the process of implementation of NTO. Rural consumer interests remain untouched which has resulted almost 35% customer deactivated and deteriorated the health of this industry.

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

Ans:

Subscriber's ability to choose Tv channels of their choice has increased in many folds in urban areas but Higher prices has become strong barrier as the rural consumer behaviors and buying capacity never considered and it has largely deprived this rural segments.

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

Ans:

Surely this provision need to be reviewed and Separate channel need to be treated as individual and separate product to eliminate this unwanted situation and to bring positive impact on subscriber choice.

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

Ans: Channel selection process already simplified, Capping the number of channels in the bouquets and ceiling price on the channels can bring considerable drop in the consumer bills. As we know distribution ecosystem of Pay Tv channels has witnessed an adverse impact and pricing is the main reason behind it.

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

Ans. Not on the 1st 100 channels, CPE cost and service support involved on multiple TV remains same and the distribution margin 20% is very negligible hence the present business model cannot absorb any further viable business discount. Discount on product for multiple TV can be designed from the product origin.

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, is it technically feasible for broadcaster to identify multi Tv connection home?

Ans. No, Capping on NCF can be designed on additional channels not on the 1st 100 Channels. Capping the number of multi Tv with mother and child formation through same customer ID is technically feasible to identify Tv connection.

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

Ans. Yes, broadcaster may allow offering different MRP for multi-home Tv connection. Multi Tv with mother and child formation through same customer ID is technically feasible to identify Tv connection.

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

Ans. Yes, If it is technically feasible on multi Tv separate package formation.

Q18. How should a long term subscription be defined?

Ans. Long term subscription be defined as Quarterly, Half yearly and Annual subscription plan.

Q19. Is there a need to allow DPO to offer discounts on long term subscriptions? Should any cap be prescribed while giving discount on long term subscription?

Ans. Yes to promote the long term subscription DPO need to be allowed a viable discount. Cap should be prescribed up to 20%.

Q20. Whether broadcasters also be allowed to offer discount on MRP for long term subscription.

Ans. Technically discount on MRP not possible by broadcasters as they are on postpaid subscription billing. Long term billing is only possible on pre paid billing hence only DPO can offer this discount in the present scenario.

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?

Ans. No its not getting misused and it has already started adopting as per the NTO.

Q22. How the channels should be listed in the Electronic program guide (EPG)?

Ans. It should not be regulated as listing involves regional and business specific parameters. Flexibility on this listing will bring smooth execution of this said process.

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

Ans. Since the migration of customer from analogue to digital already completed any promotional scheme now will only affect the existing and active customer, this is very dangerous for the ecosystem of our industry. Can plan to have promotional offer for their own deactivated or churn customer only.

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 years?

Ans. Ref Ans 23.

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

Ans. Ref Ans 23.

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

Ans. Any variable window will allow misusing the same. Hence no region specific variable NCF is required it already adopted the fixed NCF across the country, the Rs.130/- derived after considering all the cost involve in it and this is best fitted and accepted fees.

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/-?

Ans. Can be increased to 130 numbers which can be conveyed as marketing communication as only Rs.1/- per channel.

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

Ans. It should be included within this one hundred permitted channels in the NCF of Rs. 130/-

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 reach ability of these channels to masses is also served without any additional burden on the consumers?

Ans. As per NTO DD channels is a part of 1st 100 channels, as 25 mandatory DD channels already ensured the reach ability of DD channels to masses. Need some technical development as to carry this 25 DD channels we need minimum three IRD which cost Rs.3 to Rs.3.5 lakh as each DD channel consume one dedicated frequency. Request you to kindly send the recommendation to the concern department to allot minimum ten channels in one frequency to which will reduced the equipment cost involve in it.

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

Ans. Not Available