

Dear Sirs,

Our counter comments on the New Tariff Order Related Consultation Paper.

1. IBF in its reply quotes BARC estimates of the number of PAY TV Households as 164 million. We feel the time has come to stop using estimates and to rely on ACTUAL ACTIVE number of STBs only, now that there are a handful of pockets only where analog is still running due to reasons best known to the Authority. Since all Broadcasters and MSO/DTH report numbers to TRAI, it should be the sole responsibility of TRAI to disclose monthly or quarterly ACTIVE STB nos with a common terminology for reporting ACTIVE user base. Broadcasters still cry of under reporting when they have the facility of audits available to them under Regulations. If there is piracy, then its on them to stall it, by disconnecting rogue users and not keep them active for whatsoever reason.

Inflating user nos only helps Broadcasters to earn more advertising revenues and this practice should stop. If there are really 164 million homes, why can't the Broadcasters show where they exist and publish the list of areas where piracy is happening in a transparent manner. Free Dish was reported to have only 18 million now sometime back and now suddenly this number has shot up to 33-35 million.

It only suits Broadcasters to blame Cable for under declaration and TRAI should come up with Actual reported not to put an end to estimations, since one purpose of DAS was to bring about the true universe nos.

2. We disagree with the example that Sony has placed to show case the higher share of revenue to the distribution chain by quoting a low ARPU case only. What happens when the customer ARPU increases? As ARPU increases it is only the Broadcasters who benefit by pocketing most of the gains (80%). And mind you Broadcasters have never invested in any distribution infrastructure.

3. We are in full agreement with Bharti Airtel when they seek extension of the Must Provide principle for extension of Linear TV to devices like mobiles, laptops etc. It is high time that the Authority extends Linear TV regulations to OTT apps also and bring all on a level playing field.

Thanks and Regards

Team DCOAM.