

I am a subscriber from Karnataka. In response to consultation paper on tariff related issues

1. **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.** - The broadcasters are clearly misusing the freedom given to them with regard to pricing of a-la-carte channel and bouquets. From the pricing of the channels it is clear that the broadcasters are overpricing these channels @Rs.19/- to force the consumers to go for bouquets. Capping of channels pricing should be revised. Also the no. of bouquets a broadcaster can provide may be restricted.
2. **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. Clear example for this is Zee Prime Pack Kannada SD. Here Zee Kannada channel is priced Rs.19/- whereas it is offered along with other 8 channels in a bouquet at Rs.17/-.
3. **Is there a need to reintroduce a cap on discount on sum of a-lacarte 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?** - The maximum discount of bouquet can be capped @ 25% of sum of the a-la-carte channels included.
4. **What other measures may be taken to ensure that unwanted channels are not pushed to the consumers?** - Now the broadcasters can't include the channel price more than Rs.19/- in the bouquet. In the similar way channels priced less than Rs.3/- should not be included in the bouquet.
5. **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?** - No. of bouquets being offered by the broadcasters should be capped. In regions where people are speaking many languages along with regional language channels people also watch Hindi Channels. So a bouquet can be formed as a combination of both. Some of the bouquets
 - a. Regional channels bouquet
 - b. Regional & Hindi channels bouquet
 - c. Hindi channels bouquet
 - d. Sports channels bouquet
 - e. Infotainment channels bouquets
 - f. Kids channels bouquets
6. **What should be the methodology to limit number of bouquets which can be offered by broadcasters and DPOs?** - Total number of bouquets offered by the broadcaster should be limited to 20% total a-la-carte channels the broadcaster has. For example

| Broadcaster | No. of a-la-carte channels | Maximum no. of bouquets |
|-------------|----------------------------|-------------------------|
| TV 18 | 57 | 11 |
| Zee TV | 59 | 12 |
| Sun TV | 33 | 7 |
| Star India | 74 | 15 |
| Sony | 29 | 6 |
| Discovery | 13 | 3 |
7. **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?** - Now the broadcasters are bunching the junk channels along with their premium channels and

pushing to consumers with heavy discounts. Hence only the channels with MRP +/- 10% only be permitted to be included in one bouquet.

8. **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 channels of Rs.19/- or more can't be included in the bouquet then the broadcasters will hike the price of the premium channels just of Rs.19/- ceiling and force the consumers to pay high for the channels of their choice. For the subscribers from non-Hindi speaking regions, where limited number of premium channels are available this will be a burden. Hence the ceiling for a-la-carte channels may be revised at Rs.12/-. Already broadcasters are broadcasting their premium channels with other junk channels at very less charges. So it may not incur any loss. Reducing the upper cap on premium channels will attract more subscribers and in return broadcasters may attract more advertisers.
9. **How this provision has affected the ability and freedom of the subscribers to choose TV channels of their choice?** - New TRAI regime has definitely is helpful to consumers in selecting the channels of their choice. Being a DTH subscriber, earlier we had to pay Rs.70/- per month to the distributors for subscribing the sports channels though the broadcasters charge is only Rs.20-30/-
10. **Do you feel the provision permitting the broadcasters/Distributors to offer bouquets to subscribers be reviewed and how will that impact subscriber choice?** - Some of the distributors have created their own bouquet, but the channels available in these bouquets are the one which are available in individual bouquets created by broadcaster and nothing else.
11. **How the channels should be listed in the Electronic Program Guide (EPG)?** - In EPG channels should be listed Language-wise then Gender-wise i.e. L1G1, L1G2, L1G3, L2G1, L2G2, and so on.
12. **Whether DPOs should be allowed to have variable NCF for different regions? How the regions should be categorized for the purpose of NCF?** - DPOs should be allowed to reduce the NCF. It would be good if the NCF cap is revised @Rs.90/-. Further DPOs can be permitted to have variable NCF for different regions. Regions can be classified as
 - a. North India
 - b. South India
 - c. North-east states
13. **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/-?** - There is no need to increase the channels being offered within the minimum NCF as most of the families are watching more than 70-80 channels. May be 10% of the families will subscribe more than 100 channels. Also distributors should be stopped from providing FTA channels free without any NCF. At present the distributors haven't given the option to the consumers to select FTA channels as they are pushing these channels in the form of bouquets. Consumer should have the freedom to select the FTA channels of his choice and unsubscribe from other FTA channels.
14. **Whether 25 DD mandatory channels be over and above the One hundred channels permitted in the NCF of Rs. 130/-?** - Providing DD channels over & above 100 FTA channels could be the good option.