Chapter V Summary of Issues for Consultation

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. This should be removed. An example Zee Telugu (Rs.19) and Zee Cinemalu (Rs.10) together will cost Rs.29, but if I select "ZEE PRIME PK TELUGU SD" bouquet I pay only Rs.20. This bouquet has five other channels that I don't want. So, if I select the bouquet, I have to pay additional NCF charges, instead if I go with two selected channels then I pay more than bouquet.

Two options instead of present bouquet scheme:

1. **broadcaster can give discount on the selected channels if subscribers select more than one channel from the same broadcaster.**
2. **If bouquet option is continued, sum of pricing of the individual bouquet channels should not be more than 20% of the bouquet price**

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 broadcaster?

Don't Know

Q3. 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?

Don't Know

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?

Don't Know

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

Don't Know

Q6. 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?

Yes, they are very high, they should be based on language. Typically subscribers take channels in local language, English and Hindi, based on their interest.

Q7. What should be the methodology to limit number of bouquets which can be offered by broadcasters and DPOs?

Bouquets should be discouraged, instead Broadcaster may give discount based on the number of channels selected.

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 suggest?

Yes. No channel ala-carte price should be more than 10% of the average price per channel in the bouquet. If a six channel bouquet price is XX. No channel ala-carte price should be more than 1.1*(XX/6).

Q9. 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?

Yes, it has to be reviewed. Ceiling should be Rs.10

Q10. 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?

Not good for the consumers.

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

Subscribers are forced to take channels that are irrelevant. For example, "ZEE PRIME PK TELUGU SD" bouquet gives me channels that I cannot understand, follow, interested, nor can I relate to them.

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

It should be reviewed

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

Consumers are at the mercy of distributors. Distributors are not responsive and feign ignorance of TRAI guidelines. This is especially true with FTA channels. Distributors are making it mandatory to take all 100 FTA channels to increase overall channel headcount to get additional NCF fees.

Distributor should have online application and payment system for subscribers to order and pay for the channels online. These online payment sites should be verified and certified by TRAI.

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

Yes. Most of the middle-class families have more than one TV at home. So NCF discount will be helpful.

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.

Second and subsequent TV connections should not have NCF charges. It should be ZERO. Reason being that distributor is not incurring any additional expense for the second and subsequent TV

connections. No additional cable or higher bandwidth cable is laid for this. Distributors gets additional revenue from the channel charges for multiple TV connections, which is shared with the broadcasters.

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?

No harm, but there is no way with the technology today to monitor this.

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

Yes.

Q18. How should a long term subscription be defined?

One Year

Q19. 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?

Yes, discounts should be given for long term subscriptions. BSNL does it for land lines. It should be both on NCF and DRP.

Q20. Whether Broadcasters also be allowed to offer discount on MRP for long term subscriptions?

Yes

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?

No comment, don't use EPG

Q22. How the channels should be listed in the Electronic Program Guide (EPG)?

No comment, don't use EPG

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

No Comment

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 year?

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

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

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/-?

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

These 25 DD channels should be over and above the 100 channels permitted for 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 reachability of these channels to masses is also served without any additional burden on the consumers?

All distributors should carry 25 mandatory DD channels. This is non-negotiable. Distributor cannot claim technical difficulties, and down time of more than 5% over a year for any channel (one hour) is taken seriously and penalized.

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

Subscribers are the mercy of the distributors as initial investment is made in setting up the infrastructure. Subscribers have to pay whatever the distributor local operator demands violating TRAI guidelines. They have no accountability. Nodal and Appellate officers are ineffective, they have no control on the local operators. There is no grievance escalation mechanism above Appellate authority on the distributor or the local operator. A mechanism needs to be put in place to address customer grievances.

Typically, the contact numbers provided are not answered, and emails not responded. If they do, they will not assign a grievance number. I had to spend more than 30 minutes on phone and plead to get a grievance number assigned.

All renewals and payments should be allowed to be made online – Digital payments. This way the amount that is charged to the subscribers is transparent and can be independently verified by any vested or regulatory party.

Down time penalty should be introduced on cable operators, as sometimes it takes them days to fix connectivity issues. Either they should be penalized based on the down time, or subscribers should be credited for 1.5 times equivalent time.