

Thanks to TRAI for initiating Tariff Order issues after learning failure of NTO. TRAI has big concerns with issues of Broadcasters, MSO's and Subscribers. They have totally forgotten LCO's who are on Border of LIFE and DEATH after implementation of NTO. I criticise the Think Tanks of TRAI, who have again overlook the issues faced by LCO's. None of the following question relates to the issues faced by LCO/LMO. Unprofessional attitude of TRAI has put question on livelihood & LIFE of thousands LCO's and their employees. We request TRAI to look into issues FACED BY LCO also. LCO Share in revenue is not sufficient to maintain the expenses of network. LCO margin per subscriber is decreased and 30 to 50 % subscriber base is also decreased. LCO services are disturbed due to wire cutting by local electricity Boards. Their Rent demand per pole is much high. LCO is not in position to share his margin with Electricity boards as Rent.

Comments to Consultation Paper on Tariff related issues for Broadcasting and Cable services, 16th August, 2019

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. 100% misused. 15% cap on bouquet discount should be strictly implemented.

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?

Ans : Yes.

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?

Ans : Broadcaster and MSO's have national presence. They cannot create bouquets of the taste of maximum subscribers. Only LCO's should be allowed to tailor Bouquets as per their local needs and demands.

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?

Ans : DPO's are acting as aggregators of all Broadcasters. They are earning fix revenue share from broadcaster and also earning revenue from advertisings on their Platform Services. Their practical operational cost is very low.

Whereas operational cost of LMO is much higher. So discount on bouquet should be allowed to negotiate between LCO and broadcaster.

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

Ans : No Comments.

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?

Ans : Broadcasters should not be allowed to create bouquets. Only LCO shall be allowed to create limited Bouquets as per local market.

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

Ans : Need no answer as already stated above

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?

Ans : No comments

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?

Ans : Price of all PAY channels of all Genre should be same and less than Rs 1.00 Broadcasters may be allowed to fix Price of their NICHE Channels which should not be allowed to broadcast advertisements. Only FTA channels should be allowed to advertise to compensate their operational costs.

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?

Ans : Broadcasters have protected their own interest. No consumer interests have been served by provisions of NTO.

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

Ans : No doubt subscriber has got the freedom to exercise his choice, but his subscription cost goes much higher when he choose on alacarte basis in compare to bouquets.

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?

Ans : No doubt subscriber has got the freedom to exercise his choice, but his subscription cost goes much higher when he choose on alacarte basis in compare to bouquets

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

Ans : Subscriber should be allowed to add a la carte channels only which are not available in subscribed bouquet.

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

Ans : No, This provision may be left for market forces.

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.

Ans : No, This provision may be left for market forces.

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?

Ans : Need no explanation in view of above answer.

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

Ans : Need no explanation in view of above answer.

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

Ans : Any subscription more than 6 months shall be defined as long term subscription.

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?

Ans : LCO should be allowed to offer discounts on Long term subscription if allowed to tailor the bouquets. Discounts should be limited to NCF or basic Bouquet only. Do not need any cap on discounts on Basic Bouquets.

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

Ans : No. Discounts on MRP for a la carte channels should not be allowed. However Discounts to LCO may be given by broadcasters if channels are inserted in LCO Bouquets. Agreements for placement of channels in a bouquet should be at least for three years.

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?

Ans : Unique Channel Number may be given by MIB to each channel when unlinking licence is granted. It should be mandatory for all DPO's to give same channel Number. It will be convenient for subscriber to remember his channel member when he migrates from one DPO to other.

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

Ans : No Comment.

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

Ans : NO

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?

Ans : DPO's should not be allowed.

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

Ans : Allow STB portability. Rest leave on market forces.

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?

Ans : Variable NCF should not be allowed.

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/-?

Ans : All FTA channels (not less than 100) available on Platform and 25 DD Channels should be mandatory in Basic Bouquet. NCF should be increased at least to Rs 250/-

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

Ans : Yes

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? Any Other Issues

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

Ans : We request TRAI to look into issues of LCO also.