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Managing Director & CEO
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East India Hotels Ltd.

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Carlson Hotels (South Asia) Limited

Patu Keswani

Chairman & Managing Director
Lemon Tree Hotels Limited

Anil Madhok

Managing Director
Sarovar Hotels Limited

NO: 2014/HAI/600/229

June 27, 2014

**MR WASI AHMAD
ADVISOR (B&CS)
TELECOM REGULATORY AUTHORITY OF INDIA
MAHANAGAR DOORSANCHAR BHAWAN
JAWAHAR LAL NEHRU MARG
NEW DELHI - 110 002**

Subject : TRAI Consultation Paper on "Tariff Issues Related to Broadcasting and Cable TV Services for Commercial Subscribers", Response of Hotel Association of India Thereto

Sir,

The Hotel Association of India (HAI) takes this opportunity to thank the Telecom Regulatory Authority of India for eliciting its views/suggestions in respect of the TRAI Consultation Paper on "Tariff Issues Related to Broadcasting and Cable TV Services for Commercial Subscribers", issued on June 11, 2014.

The Association has sought to articulate the views/suggestions of its member hotels on those Provisions of the Consultation Paper that affect the hotel industry, and are reproduced below for your kind consideration :-

HTA/14/2014

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Definition of 'Commercial Establishment': Reference Para 1.23

HAI agrees in principle to the definition of "Commercial Establishment" given in the Para. However, this should not affect the determining of tariff by the broadcasters.

As for sub-categorizing of the commercial subscribers, *we do not support the move* on the ground that it can be disadvantageous for the luxury hotels, as the rate structure can become higher. In case no sub-categorization is done, then all commercial establishments (e.g. hospitals, restaurants, all categories of hotels, malls etc) can have a uniform rate.

Further, the logic of sub-categorizing large hotels into a separate category for tariff determination on the grounds that they have better powers to negotiate, or that such tariffs form an insignificant part of their costs, is illogical - considering the fact that the broadcasters have a monopoly and that leaves little room for negotiation. Moreover, these services are as essential for the hotel guests as they are for domestic subscribers.

Distribution of TV Signals: Reference Para 1.27

As for which Model should be prescribed for distribution of TV signals to the commercial subscribers, the Association is of the view that the third Model mentioned in the Para is preferable, as it is "a combination of the first two Models" mentioned in the Para. "In this Model both the above options are available to the commercial subscribers."

As entailed therein, the DPOs and the broadcasters both publish the RIOs and there will be competition amongst the DPOs, as well as between DPOs and broadcasters. The commercial subscribers will thus have more flexibility and options for negotiations to get competitive rates.

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