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**MATHRUBHUMI DAILY IS PUBLISHED FROM**

Kozhikode • Kochi • Thiruvananthapuram • Thrissur • Kannur • Kottayam • Malappuram  
Kollam • Palakkad • Alappuzha • Mumbai • Chennai • Bangalore • Delhi • Dubai



**The Mathrubhumi  
Printing & Publishing Co. Ltd.**

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CIN: U22110KL1922PLC001522

GST No: 32AAACT8521G1ZM

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**BEFORE THE TELECOM REGULATORY AUTHORITY OF INDIA  
AT NEW DELHI**

Written Comments of the Mathrubhumi Printing & Publishing Company Ltd., on  
the Consultation Paper on Issues Related to Interconnection Regulations, 2017  
(C.P. No.16/2019).

**A. Issues related to Placement and other agreements between Broadcasters  
and Distributors**

For the sake of convenience, the issues for consultation mentioned in paras 3.25 to 3.29 of the Consultation Paper are answered together in the following paragraphs:

1. MSOs/DTH operators are continuing to demand hefty Placement Fees/ Marketing fees even after the coming into force of the new Interconnection Regulations. Transparency and non-discrimination are the core principles of the new Interconnection regulations. All Agreements whether for Placement Fees or Marketing Fees or by any other nomenclature should comply with the principles of Transparency and non-discrimination.
2. Extortionary and unconscionable amounts in the name of Placement Fees, Marketing Fees etc. are demanded by the MSOs/DTH operators to carry the channels. MSOs/DTH Operators are not inclined to sign the Interconnection Agreements (RIOs). With a view to wriggle out of the consequences of the new Interconnection Regulations, MSOs/DTH Operators are taking the stand that the Channel would be available only on *Al-a-carte* basis if the Interconnection Agreement/RIO alone is signed without acceding to their unlawful and extortionary demands for hefty Placement fees. MSOs/DTH Operators have made a mockery of the new Interconnection regulations by demanding Placement Fees/Marketing Fees for making available the channels in the Basic Service Tier (BST) or in the packages/bouquets offered by the MSOs/DTH Operators.
3. It is needless to mention that just by placing a channel on *Al-a-carte* basis will not be of any avail either for the Broadcaster or for the Customer.

