

Dear Sir,

At the outset, I thank you for bringing out a Consultation Paper dated 16th August 2019 which profoundly raises the concern of consumers.

No doubt, the new regime has given freedom to consumers to select TV channels – standalone, bouquet or both (at least to some extent which was not present earlier). However, a large number of offerings of bouquets make selection of TV channels and bouquet a cumbersome task for consumers and primary depend on the suggestions given by DPOs. I am not against the offering of TV channels through bouquets. But, I wish to have a simplified and convenient selection process. In this response to your consultation paper, I propose certain suggestions for your kind consideration.

1. MANDATORY OFFERING OF BOUQUETS BASED ON LANGUAGE BY BROADCASTERS

Consumers have a different taste and no one or two bouquets could meet the demands of all. Consumers are broadly categorized in terms of language followed by their interest depending on age. Thus, broadcasters must make bouquets on the basis of languages (of course, subject to language-based channels are offered by broadcasters), in case they are offering TV channels in different languages.

In such language based bouquet must contain TV channels satisfying the varied interests of consumers. The varied interests of consumers are reflected in genres as mentioned in your Regulations. These are 'Devotional', 'General Entertainment', 'Infotainment', 'Kids', 'Movies', 'Music', 'News and Current Affairs', 'Sports' and 'Miscellaneous'.

But in current dispensation, major broadcasters are offering two or more TV channels in the same genre. And, all broadcasters are not offering TV channel in every genre. To overcome this problem, a broadcaster must include only one most **popular** channel from each genre. Where a broadcaster is not offering TV channel in every genre, the broadcaster should form the bouquet without a TV channel in such genre.

Thus, a language-based bouquet must contain only one **most popular** channel from each Genre (if available).

For example, a broadcaster has the following TV channels

- (a) Three General Entertainment Channels in Hindi - GEC H1, GEC H2 and GEC H3
- (b) Three General Entertainment Channels in English – GEC E1, GEC E2, GEC E3
- (c) Two General Entertainment Channels in Telugu – GECT T1, GEC T2
- (d) Two Devotional Channels in Hindi – Dev H1, Dev H2
- (e) Two Kids Channels in Hindi – Kid H1, Kid H2
- (f) One Kid Channel in English – Kid E1
- (g) One Sports Channel in Hindi – Sports H1
- (h) Two Sports Channels in English – Sports E1, Sports E2
- (i) Two News Channels in Hindi – News H1, News H2
- (j) Two News Channels in English – News E1, New E2
- (k) One News Channel in Telugu – News T1
- (l) Two Movies Channels in Hindi – Mov H1, Mov H2
- (m) Two Movies Channels in English – Mov E1, Mov E2

(n) Two Movies Channels in Telugu – Mov T1, Mov T2

Mandatory Bouquets on the basis of languages will be:

- (i) Hindi Bouquet: GEC H1, Dev H2, Kid H1, Sports H1, News H2, Mov H2
- (ii) English Bouquet: GEC E1, Kid E1, Sports E2, News E1, Mov E1
- (iii) Telugu Bouquet: GEC T2, News T1, Mov T2

In order to ascertain the popularity of TV channels, broadcasters must publish number of subscribers for each of their TV channels every quarter on their website.

2. DPOs SHOULD ALSO OFFER MANDATORY BOUQUETS

Apart from the mandatory bouquets (made by broadcasters) offered to consumers, DPOs should also be mandated to make bouquets in the same lines i.e. on the basis of languages and genre.

DPOs should be permitted to make more than one but not exceeding three-five mandatory bouquets for each language.

Further, DPOs must include most popular TV channels, as available on their platform, in the mandatory bouquets. And, DPOs must also publish number of subscribers, as available on their platform, for each of TV channels every quarter on their website.

3. OPTIONAL BOUQUETS

In addition to the aforesaid mandatory bouquets, DPOs and broadcasters should be given freedom (as given in the applicable Tariff Order) to form bouquets. DPOs must be given option to create mandatory bouquets with or without including TV channel forming part of the broadcasters' mandatory bouquets.

4. HOW THE MANDATORY BOUQUETS SHOULD BE PRICED?

As noted in the Consultation Paper, the bouquets are offered at discounts. The mandatory bouquets should also be offered at discounts. However, such discounts should be equivalent to the maximum discounts offered by broadcasters and DPOs, as the case may be, for their optional bouquets containing one or more popular TV channels.

5. CAN BROADCASTERS OFFER INFINITE BOUQUETS?

The answer to this depends on the capability of DPOs platform/system. Depending on the capability and cost incurred by DPOs in offering bouquets made by broadcaster, broadcasters must pay a reasonable cost determined by TRAI to DPOs. If any restriction imposed on the number of bouquets on account of system incapability, similarly DPOs should also be subjected to such restrictions. Thus, broadcasters and DPOs must be allowed to offer equal number of optional bouquets.

6. DISSEMINATION OF INFORMATION ABOUT MANDATORY BOUQUETS

Both broadcasters and DPOs must sufficiently advertise mandatory bouquets from time to time so that consumers are well informed about their mandatory bouquets.

7. CONSUMERS DOES NOT KNOW WHAT PROGRAMMES WOULD BE TELECAST IN A PARTICULAR CHANNEL

Consumers at the time of selecting TV channels do not know what they are going to watch through subscribed TV channels and even after subscribing TV channels. Consumers through EPG are being informed only of upcoming TV channels for next 24 hours. Many times, consumers select TV channels which primarily show repeat programmes.

Consumers have inherent right to know “what are they paying for”. Therefore, it is important that broadcasters and DPOs should inform consumers about each TV channel including (i) types of programmes would be shown; (ii) whether the programmes would be original; (iii) whether the programmes would be both original and repeat; (iv) if repeat programmes, the programmes were originally/initially telecast on which TV channels; (v) number of new programmes would be telecast in one month; (vi) number of repeat programmes would be telecast in one month.

The above information if made available, would significantly help consumers to choose TV channels as per their need.

Hopefully, in coming times, the selection process of TV channels will be simplified and information of programmes will be at least broadly informed.