

Comments on Consultation Paper

By

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CHAPTER V: ISSUES FOR CONSULTATION

I am furnishing my response primarily as a concerned citizen of India to lend voice in support of structured growth of DTH as a carrier having a terrific potential to reach the most remote corners of our country and help in empowering majority of our country men who may not be as blessed as we are in terms of affordability for periodically subscribing to paid TV content. Its potential in enabling the not so privileged populations educate themselves is beyond comprehension, apart from the entertainment value it brings provided the prices are affordable to them. The mobile telecom revolution happening in India is a serving example which is one of the most affordable globally in terms of ownership and to a good extent in usage. My response as a subscriber to more than one paid DTH service is secondary but definitely relevant. As brought out in the consultative paper, considering the limitations in implementing pan India CAS and IPTV rollout, DTH will definitely continue to be a powerful medium for several years to come, with its potential of rapid scalability & pan India reach at a reasonable ownership cost though subsidised upfront by the DTH providers to some extent. Of course whether they are reasonable to maintain or subscribed to by all the classes of population is highly debatable considering irrelevance of most of the channels packaged by them at the 'basic service tier' cost of around Rs. 100 + taxes, as currently offered by most of the DTH players. Though Doordarshan is successful in this regard to some extent providing services at NIL charges, considering the limited no. of relevant channels for viewers of various sections, there is a strong need to enable private DTH operators to provide more variety of channels at a relatively higher price point but within the means of affordability of the Rural India. This should come with empowerment of the subscriber to opt for a select no. of channels of choice relevant to him/her, imposing the only condition at customer end to pay a MINIMUM SUBSCRIPTION AMOUNT OUTGO TO DTH SERVICE PROVIDER, even though it is higher say Rs. 125. To stand upto the definition of addressable systems, If such selection is made available to the urban and semi-urban areas also, subscription to the additional channels can very well continue be left for the market forces between Cable industry and DTH to survive on their strategy and pricing, freeing the regulator from the tricky & near impossible issue of pricing the channels individually.

Hence it is a great responsibility on part of TRAI as a regulator to ensure paid DTH services to be affordable for the Rural India specifically not just to own but also to subscribe on a monthly basis. It may be incidental that the other Indian consumers also benefit from it to some extent if the channels can be selected; but in any case their affordability can fulfill their requirement of varied content, offered at higher price points.

Hence as most of the issues raised by Tata Sky in their petition are valid, it upto TRAI to bring the radical implementation of addressability from cutomers view point to some extent, without getting into the issue of pricing the individual channels. Instead the regulator to should make the TV channels to additionally list retail

level price per customer per month in case of DTH/Addressible system in addition to the wholesale price, to enable customers exercise their selection on a minimum one month payment basis through their respective DTH/CAS provider. There should be a mandatory option to subscribe to any channel of their choice individually in addition to the currently existing option to view channels through bouquets created by repackaging the channels purchased on a wholesale basis by the DTH/CAS provider.

2. To create solutions TRAI should notify & ensure implementation of interoperability of DTH Set top boxes immediately.

(6.1 Provisioning of new services on DTH platform)

3. DTH should not be allowed to add their own feed like advertisements which should be strictly limited to TV or Radio channels, without which they will not be able to meet the costs of quality content. However select content like movie channels, Active darshan, Active learning of Tata Sky brand or equivalent, or any other broadcast or telecast of that sort can be allowed but without any commercial advertisements and necessary statutory changes may have to be brought out if required.

4. DTH is additionally bringing in excellent Radio Channels like several FMs, Music traditional/modern, Lok Sangeeth of different states and regions into our drawing rooms which are originally broadcasted by remote and distant terrestrial radio stations (or satellite radio), which are otherwise impossible to listen to by some one located in a different part & corners of India or may be even abroad, which can be listened through our high quality and fidelity audio/TV systems. This is an excellent feature by any measure brought bu TV channels as VAS mostly at no explicit costs. This should not be curtailed/restricted on the reason that they are radio channels or content with advertisements. In this type of reception DTH is simply using one aspect of entertainment ie., audio signal. So why should it bother anyone including regulators & Ministry concerned if the DTH/CAS provider is ready to offer it, subject to disallowing their own commercial advertisement. Carriage fee should preferably be disallowed in such cases and even if allowed it should be fixed by TRAI and at bare minimum considering the potential additional reach of radio advertisements.

Thank You

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