

**BY EMAIL/REGISTERED POST ACKNOWLEDGEMENT**

**WITHOUT PREJUDICE**

To,

Date- 23-09-2019

Mr. Arvind Kumar,

Advisor (B&CS),

Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhavan, Jawaharlal Nehru Marg,

Old Minto road, New Delhi-110002

**Reference-** Consultation Paper on Tariff related issues for Broadcasting and Cable Services dated 16-08-2019

**Subject-** Written Comments on Tariff related issues for Broadcasting and Cable Services

Sir,

At the outset, being member of All India Digital Cable Federation (AIDCF), we have already filed our written comments through AIDCF on the draft consultation on tariff related issues and we are in line and in consonance with those comments. However, in addition to it we are submitting some more comments which are as follows:

1. As per proviso clause of sub regulation (1) of regulation 4 of the Telecommunications (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff Order, 2017, the network capacity fee in the slab of 25 SD channels each beyond initial one hundred channels capacity, shall in no case exceed Rupees 20/- excluding taxes. In order to protect the interest of the consumers, we are of the opinion that this proviso should be changed "to charge 80 paise per channel for additional one channel beyond initial 100 channels" so that consumer does not have to pay Rs. 20/- for choosing additional one channel only. This proposed provision shall be consumer friendly it shall not be burdensome for the consumer to pay unnecessary extra fee.


**UCN Cable Network Pvt. Ltd.**

502, 'milestone', 12, ramdaspath, nagpur - 440 010


p. +91-712-6633888, 6633999, f. +91-712-6633990

e. info@ucnindia.com visit us at : www.ucnindia.com



2. The real interest of the consumer can be protected by making reduction in taxation. We are of the opinion that the Goods and Service Tax (GST) for our services are very high which should be brought down from 18% to 5% in accordance with the print media as we both the sectors are providing same services of information and entertainment. It is discriminatory to levy 18% GST to our services than to levy 5% on services for print media. If such recommendation is forwarded by our regulator to GST council/concerned Government administration, and on its acceptance, this will be major relief not only to the consumers but for all the DPOs and the broadcasters.

Under the circumstances for ease of doing business and for effective implementation and orderly growth of the sector, we request you that our aforesaid suggestions by way these written comments should be seriously considered by the regulator.

  
Head Legal  
(Adv. Sandip Joshi)



**UCN Cable Network Pvt. Ltd.**

502, 'milestone', 12, ramdaspeth, nagpur - 440 010

p. +91-712-6633888, 6633999, f. +91-712-6633990

e. [info@ucnindia.com](mailto:info@ucnindia.com) visit us at : [www.ucnindia.com](http://www.ucnindia.com)