

**TAMILNADU PROGRESSIVE CONSUMER
CENTRE**

Regd. No. 166/89

No. 604, 1st Floor, C.T.H Road, Pattabiram, Chennai – 600 072. Tamilnadu

Date: 25-04-2010

To

The respectable Chairman,
Telecom Regulatory Authority of India,
Mahanagar door sanchar bhanvan,
Jawaharlal Nehru Marg,
New delhi -2

Sir,

Sub: Our comments for consultation paper on Non-CAS tariff.

Ref: your consultation paper no 5/2010

We thank you for coming out with the said consultation paper. Hope the effect of this consultation paper would make some improvement in the cable Tv services.

We humbly request you to add our name in your regular mailing list of the consultation papers and enable us to participate in time. Because that we have come to know about the present consultation paper in this late stage, we are sending our comments as a brief form.

Thanking you.

Yours in consumer service,

J.Jayakumar,
Treasurer.

TPCC

Preliminary request::

We request the Authority that whatsoever may be the result of the outcome of this consultation paper, the charges payable by the consumers for pay TV shall not be increased as the prices of electronics goods and services based on electronics are constantly coming down. The case of cell phone services shall be the example and hence we humbly request the authority not to take any decision which would increase the price to the end consumer.

7. What according to you is the average analog monthly cable bill in your state or at an all India level?

In our state of Tamil Nadu the monthly cable bill varies from Rs. 100/- to Rs.150/-

10. Which of the following methodology should be followed to regulate the wholesale tariff in the non-CAS areas and why?

- i) Revenue share**
- ii) Retail minus**
- iii) Cost Plus**
- iv) Any other method/approach you would like to suggest**

The revenue share method can be adopted. A system may be devised to share the present revenue collected by the cable operators from the consumers. Any other method would demand extra charges from the consumers.

14. What is your view on the proposal that the broadcasters recover the content cost from the advertisement revenue and carriage cost from subscription revenue? If the broadcaster is to receive both, advertisement and subscription revenue, what according to you should be the ratio between the two? Please indicate this ratio at the genre levels.

As the consumer is paying for viewing the channels the broadcasters of pay channels should be barred from transmitting any advertisements.

15. What is your view on continuing with the existing system of tariff regulation based on freezing of a-la-carte and bouquet rates as on 1.12.2007; and the rate of new channels based on the similarity principle at wholesale level? You may also suggest modifications, if any, including the periodicity and basis of increase in tariff ceilings.

The broadcaster should be mandated to give the channels only in a-la-carte and never in the form of bouquets. Bouquet system is anti consumer in nature.

18. In case of retail tariff ceiling, should a ratio between pay and FTA channels or a minimum number of FTA/pay channels be prescribed? If so, what should be the ratio/number?

Yes, a ceiling should be prescribed in retail level and not expanding beyond the present prevailing level.

19. Should the broadcasters be mandated to offer their channels on a-la-carte basis to MSOs/LCOs? If yes, should the existing system continue or should there be any modification to the existing condition associated with it?

Yes, the broadcasters should be mandated to give only in a-la-carte basis.

20. How can it be ensured that the benefit of a-la-carte provisioning is passed on the subscribers?

After the introduction of DTH we feel the difference in the attitude of the cable operators. They are in continuous fear of the customer migrating to DTH. This competition, we hope would make them to pass the benefit to consumers to retain them.

22. Should the carriage and placement fee be regulated? If yes, how should it be regulated?

Carriage and placement coerces a tv channel to the consumer. By paying carriage the broadcaster places in first band where the consumers are forced to watch the channels. After taking the mileage in viewer ship they either increase the subscription charges or advertisement charges or both. This is a clear dumping policy adopted by the broadcasters in tie up with the MSOs. At an outset the entire system of carriage/placement fee is dumping which is against the will of the consumer and illegal through anti dumping laws.

We request TRAI to rather ban the carriage/placement system instead of regulating it. Any regulation of the above would lead to legalizing the anti-consumer/dumping act of the broadcasters which would go against the larger consumer interest.

29. Do you agree that complete digitization with addressability (a box in every household) is the way forward?

Yes only complete digitalization with addressability will give justice to consumers

30. What according to you would be an appropriate date for analog switch off? Please also give the key milestones with time lines.

As large portion of the networks are still analog a migrating time of 4 years may be given before switch off.

32. Is there a need to prescribe the technology/standards for digitization, if so, what should be the standard and why?

Yes

36. Should there be a 'basic service' (group of channels) available to all subscribers? What should constitute the 'basic service' that is available to all subscribers?

Yes

37. Do you think there is a need for a communication programme to educate LCOs and customers on digitization and addressability to ensure effective participation? If so, what do you suggest?

Yes
