

Date : 18/06/2013

From
S.T.Balamurugan,
19/3, CPWD Quarters,
K.K. Nagar,
Chennai-78.

To
The TRAI,
New Delhi.

Sirs,

Sub.: Submission of comments on The Telecommunication (B&CS) Services (Fourth)
(Addressable Systems) Tariff (Second Amendment) Draft Order, 2013.

I would like to present my personal comments/suggestions on the Telecommunication (B&CS)
Services (Fourth) (Addressable Systems) Tariff (Second Amendment) Draft Order, 2013 as a customer in
the annexure furnished herewith.

Hence I request the Authority to consider the comments/suggestions in the interest of
consumers.

Yours faithfully,

(S.T.Balamurugan)

Encl.: As above.

Comments/Suggestion on the Telecommunication (B&CS) Services (Fourth) (Addressable Systems) Tariff (Second Amendment) Draft Order, 2013

Basic Service Tier for the Digital Addressable Systems

I request TRAI to allow MSOs/DTH Operators to include Pay channels in the BST, if the MSO/DTH Operator is willing so, in the interest of customers. All Free channels shall be offered in the BST itself. Other Pay channels which are not available in BST may be available in A-la-carte basis. The MSO/DTH Operator may offer the pay channels on bouquet if such bouquet is beneficial to the customers.

Pricing of BST

Maximum retail price of BST shall not be more than Rs.100 exclusive of all taxes. There shall not be different BST prices for different Addressable systems. A-la-carte rate of channels shall be same for all addressable systems. I would like to point out that DTH Operators have increased the price of BST to Rs.170 in southern states and to Rs.220 in other states, even though TRAI has fixed BST of DTH services at Rs.150 (exclusive of taxes) per month. I do not find any reason for different prices for different regions other than exploitation of customers taking advantage of prevailing market conditions. TRAI may direct the operators to explain the discrimination in pricing for different regions.

Pricing for A-la-carte Channels

I would like to point out that MSO/DTH Operators have been permitted to charge for the FTA Channels which they are getting from the broadcasters free of cost in the pretext of offering the channels on a-la-carte basis. When the MSO/DTH Operator is getting the channel free of cost from the broadcasters, there is NO rationale for charging the customers for the free channels. In addition to that the MSO/DTH Operator may collect a huge amount from the broadcaster by way of carriage fee and placement fee for carriage of the free channels on their network. If FTA channel is allowed to be charged from the customers, the MSO/DTH Operator will dump unwanted FTA channels in BST and charge for good FTA channels. Ultimately the customer will have to pay more for a-la-carte channels even above the cost of BST for watching good channels. Hence I request TRAI not to allow the cable operators/MSOs/DTH Operators to exploit the customers by charging for Free channels in the pretext of offering the channels on a-la-carte basis. All the FTA channels shall be available in the BST itself.

Retail pricing of channels

The retail price of A-la-carte Pay channel/bouquet shall not be more than 25% of the whole sale price. 100% increase in the retail price over and above whole sale price will result in exploitation of customers.

All the benefits and discounts offered by the Broadcasters shall be passed to the Customers by the MSO/DTH Operators.

Other issues

TRAI may engage BECIL for 100% audit of records/data base of all MSO/DTH Operators to ensure that all the regulations and tariff orders are practically implemented by the operators and the customers are not exploited in any manner.

Penal action may be initiated against the LCO/MSO/DTH Operator/Broadcaster who violate any regulations, tariff order of TRAI and who indulge in anti customer activities.

Clause wise compliance of all regulations & orders of TRAI may be posted in the web sites of respective Operators/Broadcasters. Wide publicity shall be given to the regulations, tariff orders of TRAI, so that the customers may take an informed decision.