

Bharti Telemedia Limited (BTL)'s Response to TRAI Consultation Paper on "The Register of Interconnection Agreements (Broadcasting and Cable Services) Regulations, 2016"

Q1. Why all information including commercial portion of register should not be made accessible to any interested stakeholders?

Q2. If the commercial information is to be made accessible,

(a) In which way, out of the three ways discussed above or any other way, the commercial information should be made accessible to fulfill the objective of non-discrimination?

(b) Should it be accessible only to the service providers, general public or both?

(c) Should any condition be imposed on the information seeker to protect the commercial interests of the service providers?

Q3. If the commercial information is not made accessible to stakeholders, then in what form the provisions under clause (vii) and (viii) of Section 11 (1) (b) of TRAI Act be implemented in broadcasting and cable sector so that the objective of non-discrimination is also met simultaneously?

BTL's Response:

1. We believe that the commercial information should be made available only to service providers (broadcasters or DPOs) holding a valid licence. The same can be made available to the concerned service provider upon a specific request and after paying a nominal fee.
2. The above approach will be fair, non-discriminatory and transparent, as each and every stakeholder in the broadcasting sector will have an equal opportunity to access the required information.

Q4. Please provide suggestions on regulation 5 of the draft regulations regarding periodicity, authentication etc.

BTL's Response:

1. We believe that the current process is working fine in the case of DTH operators, as all DTH operators enter into long-term commercial agreements with broadcasters, at least for two years.

2. Therefore, in the case of DTH operators, the process of annual submission of agreements should continue.

Q5. Please provide comments on how to ensure that service providers report accurate details in compliance of regulations?

Q6. Please provide comments on digitally signed method of reporting the information.

BTL's Response:

1. In order to ensure that the reports are accurate and are in compliance with the regulation, the same should be signed and certified by the Authorized Signatory of the Company.
2. We shall also submit the reports in a digital form with digital signature, if required.

Q7. Please provide suggestions on regulation 6 of draft regulations and also the formats given in schedules? Stakeholders can also suggest modified format for reporting to make it simple and easy to file.

BTL's Response:

We are fine with the schedule as given in the consultation paper

Q8. Any other suggestions relevant to the draft regulations.

BTL's Response:

Not Applicable