

Responses on Issues for Consultation Non- CAS Cable QoS

RESPONSE:

Introduction for non CAS Cable Services:

There are nearly 78 million consumers receiving cable TV services in non-CAS areas, being served by about 60,000 cable operators. In 2004, the Authority had indicated the code and guidelines for Quality of Service for cable TV services. However, no formal regulations were issued in view of highly fragmented nature of cable TV sector, because of implementation difficulties at ground level.

The basic analog nature of the industry, coupled with the non organized last mile operators, many of the basic QoS issues need implementation primarily at LCO levels.

TRAI had issued Quality of Service Regulations for cable services for CAS notified areas in 2006. The DTH subscribers have also been made aware by the Quality of Service Regulations for DTH Services issued by TRAI in 2007.

We believe that after the successful lessons learnt from the QoS Regulations for cable TV services in CAS notified areas, it was felt by TRAI that the consultation process should be started for putting in place the quality of service regulations to empower the consumers in non-CAS areas also.

It is important to note the issues on proper procedures and timelines for connections, disconnections and transfer of cable services are pertinent to the existing mechanism of business, payment and collection system.

Even the issues regarding the procedures for billing and effective mechanism for handling technical and billing related complaints, for overall complaint handling and redressal by the service provider and timeline, and the procedure for services relating to provision of digital decoders and STBs in non-CAS areas, wherever service providers are providing digital services, has to be seen in light of genuine digitalization options and addressability QoS.

For Non-CAS Cable Services:

4.1.1 Please offer your comments on the areas and parameters of Quality of Service which need to be covered in such regulations (refer para 2.16)? Please offer comments whether QoS parameters should also

be made applicable to voluntary CAS networks in non-CAS areas. If yes, then please indicate what these parameters should be.

RESPONSE:

We believe that this is in reference with the digital STBs being in place for non CAS areas.

We have the following comments against each issue:

- (i) Proper procedures and timelines for connections, disconnections, transfer of cable services :

The basic QoS of ensuring the details of the customer with valid check of his documents of identity and address should be completed by the LCOS and given back to the concerned MSO.

Digitalization or voluntary CAS in non CAS area definition should be made more explicit. If the services in digital are addressable and customers can be offered a choice to select or not to select, then those services can be priced and the pricing information should be informed to customers

- (ii) Proper procedure for billing and effective mechanism for handling technical and billing related complaints

The billing to these customers (who have received STBs) can start only when the details of the subscribers are provided as a mandatory QoS from the LCOs.

Based on this a billing procedure, based on the agreed billing cycle (can be monthly, quarterly, half yearly or annual) can be effected. Consequently billing related complaint mechanism be applied

- (iii) Procedure for overall complaint handling and redressal by the service provider :

Each MSO providing digital Cable services need to have a 24 hour operational Customer Care provisions for Overall complaint handling . The rest can be similar to CAS areas.

- (iv) Timeline and the procedure for services relating to provision of digital decoders and STBs in non-CAS areas, wherever service providers are providing digital services

Timelines can be adopted, wherever a STB is supplied and the QoS is implemented at the operator level in providing the correct detailed information to concerned MSOS. The QoS in a non CAS area effectively starts from the LCO.

- (v) Procedure for informing the subscribers about change of channels along with their channel position

Channel position is not really valid in a digital cable set up. However, addition or deletion of the channels can be informed through an "Info Channel"

- (vi) Mechanism of rebates in cases of interruption of service

*This may not be possible now, in lieu of lump sum billing and mostly the billings are discounted. However, **if the breaks or interruptions are more than a day for all channels**, then some rebates may be considered as a QoS policy.*

- (vii) Technical standards to be observed by the service providers

The technical standards are already maintained by the MSO till the LCO level in terms of dB levels etc. It is essential that this QoS should be asked to be followed by the LCO at his own cost or based on his market based price negotiation with the customer.

- (viii) Effective monitoring of Quality of Service standards

This will be a hurdle till addressable digitalization is on in the country. In absence of this, self regulation and Monitoring by MSOs on the QoS should be adopted. We all are aware that the MSOs don't have the access to the last mile LCOs network and many QoS problems remain at the level of the LCOs

- 4.1.2 In particular, comments and suggestions are invited for effective and transparent monitoring and implementation of proper billing, to protect consumers' interests.**

RESPONSE:

Customers with Digital STBs in any areas have to provide their name, address and identity details for registration and subsequent billing.

The option of buying a STB with its services and price should be left to customer and if the offers of different/additional content s, then the prices can be charged under the VAS (Value added Services)scheme and the logic that these services are optional with a customer choice.

4.1.3 There is an expectation that the State Governments and the Ministry of Information & Broadcasting will extend necessary cooperation in the effective implementation of QoS Regulations. Can you suggest any other supplemental measures for further strengthening the implementation of QOS Regulations?

RESPONSE:

As suggested above, the self regulatory and monitoring mechanism by the MSOs should be initiated at this stage to cover around 80 million non digital cable homes. As addressable digitalization progresses, CAS like QoS can be adopted with a Government or an independent body monitoring same, apart from self Regulation.

We are aware, that many content issues of TV channels have adopted self regulatory position, accepted by Government.

4.1.4 Please offer your view on any other issues which will make the Regulations more complete and effective.

RESPONSE:

We have already mentioned that the only way to move forward is the mandatory addressable digitalization, which can enhance and ensure choice to customers on the pay channel front and have an option to consider OTHER VAS based content services and channels of their choice.

TRAI's own recommendation of CAS extension to the four metros and the 55 city digitalization to Government is pending for long. Also the restructuring of cable industry recommendations, if adopted will pave way for QoS in all Cable areas upto a certain extent.

The complete and genuine QoS recommendations, which can be beneficial for millions of Cable subscribers, can not see the light of the day easily, until the addressable digitalization recommendations are fully adopted and implemented.
