

Siti Networks Ltd. comments on the consultation paper on Renewal of Multi-System Operators (MSOs) Registration

3.1 What should be the period of extension/renewal, to be prescribed in the Cable Television Networks (Regulation) Act, 1995 /Cable Television Networks Rules, 1994, on the expiry of the initial period of permission of MSO registration? Please elaborate your response with justification.

Response : The period of initial registration has been fixed for 10 years and the renewal for the same period should be considered.

3.2 Whether a one-time fee should be levied at the time of renewal of the MSO registration? If yes, please suggest amount of fee for such renewal to be prescribed in the Cable Television Networks (Regulation) Act, 1995 /Cable Television Networks Rules, 1994. Please provide detailed reasoning for your comment.

Response : One time fee equivalent to the initial amount of registration fee of Rs. 1 lakh should be levied so that only operational MSOs submit for renewal.

3.3 Should a time window be prescribed before the expiry of MSO registration, within which the MSO shall apply for renewal of the MSO registration?

Response : The MSO should submit the renewal application at least 3 months before the date of expiry of the registration.

3.4 In case an MSO has applied for renewal, and the final decision on renewal is pending, what should be the provision to ensure continuity of service for the consumers on expiry of previous registration?

Response : In case the final decision on renewal is pending from the ministry, the MSOs should be allowed to operate till such time a decision is not taken on the renewal. The MSOs should be allowed to operate on the previous license.

3.5 In case an MSO hasn't applied for renewal before the expiry of its registration:

3.5.1 What should be the status of services by such MSO after the expiry of registration? As per extant guidelines/ regulations an MSO with valid registration only can get the signals of a television channel. Should a broadcaster

disconnect the television channels for such MSOs whose registration has expired?

Response : The MSOs who have not submitted their application for renewal of the license till the date of expiry should be given notice by the broadcasters as per existing regulations to switch off the signals to such MSO's and run scroll on the subscribers and disconnect the signals on due date in case the application is not submitted for renewal till such date. In case of late application, there should be a late fee of Rs.1,000 per day for late filing of application for renewal.

3.5.2 Should existing registered operational MSOs be provided with an extended time beyond the original registration period for applying for renewal? What should be the maximum time after expiry up to which an application for renewal can be entertained by MIB?

Response : Till the time the renewal guidelines are not published, the MSOs should be allowed to operate. However, after publication of the guidelines for renewal and putting up a renewal system in place, MSOs should be given 3 months time to apply for the renewal.

3.5.3 Should there be an additional fee for such applications that are received after the expiry of registration period?

Response : Replied above in response to point no. 3.5.1 and 3.5.2.

3.6 Should some qualifying conditions be prescribed for renewal of MSO registration, under which the MSO, along with the application for renewal, shall be required to submit its compliance status with the terms and conditions of registration and the extant regulatory framework?

Please provide the details of:

(i) List of necessary compliances that should be mandatory for considering renewal of MSO registration,

Response : Following should be submitted by the MSOs for renewal of license;

- i) Operationalization/sharing of headend certificate**
- ii) Website**
- iii) Customer care service**
- iv) Compliance officer details**
- v) DAS audit certificate for previous year**
- vi) Affidavit for carriage of mandatory channels**

(ii) List of documents, which may include, but may not be limited to, self-certifications, NOCs from TRAI/MIB/licensing authority, audit reports etc. that

would be required to be submitted for verification of such compliances at the time of application,

Response : Following should be submitted by the MSOs for renewal of license;

- i) Operationalization/sharing of headend certificate**
- ii) DAS audit certificate for previous year**

(iii) Any other mandatory requirements for verification of status of compliances of the MSOs before grant of renewal of registration.

Please elaborate your suggestions with reasons for the mandatory requirement of each compliance in tandem with ease of doing business in the television distribution network.

3.7 Should there be any additional terms and conditions for renewal of the permission for MSO registration? Please elaborate.

Response : The existing framework is sufficient.

3.8 Stakeholders may also provide their comments on any other issue relevant to the present consultation.