

UCOWA

Regd. No. : S/47348

United Cable Operator's Welfare Association (Regd.)

218, L - Market, Shri Niwas Puri, New Delh - 110 065. Tel. : 26849574, 26921443

President :

S. P. S. Sehgal
Cell.: 9654444224

Vice President-I :

Rakesh Khanna
Tel.: 26312880

Vice President-II :

Gulsher Singh Behl
Tel.: 24355482

General Secretary :

Anil Kapoor
Cell.: 9810115501

Secretary-I :

Sanjay Malhotra
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Secretary-II :

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Treasurer :

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Spokesperson :

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Office Secretary :

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Tel.: 31003854

Legal Advisor :

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Cell.: 9811169099

Propaganda Secretary :

Gurcharan S Chaddha
Cell.: 9310044108

Dated 3rd September 2013

Wasi Ahmed,
Advisor (B & CS)
Telecom Regulatory authority of India
Mahanagar Doordsanchar Bhawan
Jawahar Lal Nehru Marg,
Old Minto Road,
New Delhi 110002

Re: Consultation Paper No. : 8 /2013

Subject: Comments on "Distribution of Tv Channels from Broadcasters to Platform operator".

We appreciate TRAI for coming up with an practical and realistic consultation paper on the above mentioned subject, to curb the monopoly and anti competitive practice. I have been associated with this industry for the past several years

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and had several court cases pertaining to the similar subjects. The comments to this consultation papers are my expression of my views to the efforts of the regulator.

In addition to the proposals already made by TRAI in the consultation paper, the following recommendations are made:-

(i.) The broadcaster and authorized distribution agents will act on a principle-agent basis and, the authorized distribution agent shall act only as a division of the broadcaster.

(ii.) The authorized distribution agent will merely act as a liaisoning division for the broadcaster and shall not enter into any agreement on behalf of the broadcaster.

(iii.) The authorized distribution agent of the broadcaster shall have no interest with respect to any another broadcaster.

(iv.) The authorized distribution agent of a broadcaster shall have no interest with respect to any other player in the

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supply chain or in the industry be it an MSO, LCO, DTH service provider, etc.

(v.) Restrict the role of Aggregator to single broadcaster and they may not be not be allowed to deal with multiple broadcasters.

(vi.) Get rid of aggregators of pay channels so that consumers have more power to decide what content they should consume rather than a cartel of pay channels deciding that.

(vii.) Pay channels should be offered by the broadcasters **only** on a-la-carte basis.

(viii.) An upper ceiling limit per end-subscriber/consumer is fixed and the broadcaster is obliged to fix the price of a pay channel on a-la-carte basis, only with such prescribed upper ceiling limit.

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(ix.) If two pay channels are offered by the broadcaster belonging to the same genre then the price charged for one shall be the same as charged for the other, but if a content of channel is repeated in the another channel then it should not be charged similarly

Your's Faithfully



(S.P.S. SEHGAL)

President