

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



Comments on

**Draft Telecommunication (Broadcasting and Cable) Services
Interconnection (Addressable Systems) (Seventh Amendment)
Regulations, 2025**

Honourable Madam/Sir,

Namaskar.

We commend the Authority for its proactive and consultative approach in strengthening transparency, accountability, and technological robustness in the broadcasting and cable services ecosystem.

1. Support for Annual Audit Mandate (Regulation 15(1))

We strongly support the retention and refinement of Regulation 15(1), which mandates annual audits of addressable systems. This provision is essential for:

- **Consumer Protection:** Ensures that monthly subscription reports are accurate, preventing overcharging or underreporting.

- **Transparency & Trust:** Builds confidence among stakeholders—broadcasters, distributors, and consumers—by institutionalizing third-party verification.
- **Regulatory Oversight:** Empanelment of auditors and mandatory reporting timelines (by 30th September) enhance compliance and reduce disputes.

The inclusion of broadcaster participation during audits (without influencing the process) is a balanced step that respects both operational independence and stakeholder engagement.

2. Exemption for Small DPOs (Subscriber Base ≤ 30,000)

We appreciate the pragmatic exemption for small DPOs from mandatory audits. This recognizes the operational constraints of smaller players while:

- Maintaining checks via broadcaster-initiated audits if necessary.
- Encouraging proportional compliance without stifling regional or niche service providers.
- Promoting inclusivity in the regulatory framework.

We recommend that TRAI periodically review the subscriber threshold to reflect market dynamics and technological evolution.

3. Shift from Calendar Year to Financial Year

The substitution of “calendar year” with “financial year” is a welcome alignment with industry accounting practices. It simplifies audit scheduling, improves financial reconciliation, and aligns with statutory reporting cycles.

4. Infrastructure Sharing Provisions (Schedules III & X)

The incorporation of infrastructure sharing protocols is a forward-looking move that:

- Encourages cost-efficiency and resource optimization.
- Ensures data segregation and auditability across shared platforms.
- Maintains consumer experience integrity through watermarking and logo visibility norms.

This will foster innovation and scalability, especially for emerging digital platforms.

5. Dispute Resolution and Special Audit Mechanism

The structured pathway for broadcasters to raise discrepancies and seek special audits is a robust safeguard. It balances:

- Distributor accountability.
- Evidence-based escalation.
- TRAI's adjudicatory oversight.

We suggest TRAI publish anonymized audit outcomes and compliance trends to promote industry-wide learning and benchmarking.

Conclusion

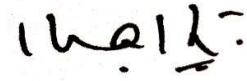
The Seventh Amendment Regulations reflect TRAI's commitment to a fair, transparent, and technologically sound broadcasting ecosystem. As a consumer advocacy body, we believe these reforms will:

- Empower consumers through accurate billing and service delivery.

- Encourage responsible conduct among service providers.
- Strengthen India's digital broadcasting infrastructure.

We thank TRAI for this opportunity and remain committed to supporting its regulatory mission.

Warm regards,

A handwritten signature in black ink, appearing to be 'Kashyapnath' with a stylized flourish at the end.

(Dr. Kashyapnath)
President