

Fwd: Please make note of the attached letter

Bhupendra Singh <srobcs2@traf.gov.in>

Wed, 15 Oct 2025 10:57:18 AM +0530

To "Ajay Kumar"<interconnect-bcs@traf.gov.in>

===== Forwarded message =====

From: Sapna Sharma <jtadv-bcs@traf.gov.in>

To: "Bhupendra Singh"<srobcs2@traf.gov.in>, "Sanyatjeet Pawde"<s.pawde@traf.gov.in>

Date: Wed, 15 Oct 2025 10:37:09 +0530

Subject: Fwd: Please make note of the attached letter

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From: Deepali Sharma <advbcs-2@traf.gov.in>

To: "Sapna Sharma"<jtadv-bcs@traf.gov.in>

Date: Tue, 14 Oct 2025 15:32:59 +0530

Subject: Fwd: Please make note of the attached letter

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From: Jigar Trivedi <jjigartrivedi@gmail.com>
To: <advbcs-2@traf.gov.in>, <jtadv-bcs@traf.gov.in>
Date: Mon, 13 Oct 2025 16:58:38 +0530
Subject: Please make note of the attached letter
===== Forwarded message =====

Respected Sir/Ma'am,

Please find the attached letter and kindly do the needful.

Thank you

1 Attachment(s)

Comments.pdf

107.4 KB

Comments on TRAI's draft Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Seventh Amendment) Regulations, 2025

Digitization in the broadcasting sector was mandated in phase manner from 2012 with the stated objective of ensuring that consumers enjoy genuine choice. However, this objective remains unfulfilled and, in fact, now appears largely defeated.

Instead of safeguarding consumer interests, the regulatory focus has increasingly shifted towards mediating disputes between broadcasters and DPOs, both of whom have been the primary financial beneficiaries of the said framework. The reality is that while broadcasters and DPOs continue to blame each other publicly, they both profit collectively, enjoying manifold increases in subscription revenues over the years.

In contrast, consumers have only lost out, paying higher amounts for channels, receiving bundled and irrelevant bouquets (from both broadcasters and DPOs) and seeing “à la carte” choice effectively reduced to fiction.

Moreover, TRAI itself has recently acknowledged that broadcasters derive a major portion of their revenue from advertisements. This exposes a fundamental flaw in the current structure: subscribers are being made to pay for channels that already earn through advertisements. In other words, consumers are now paying to watch advertisements, a clear contradiction to the principles of fair value and consumer protection.

Simultaneously, the quality and relevance of content have deteriorated, with little to no real investment in creative programming or innovation. Against this background, it is both unfair and unreasonable to expect subscribers to bear ever-increasing costs. A true pay channel, by definition, should be ad-free and premium in quality, relying primarily on subscription revenue rather than dual monetization through ads and consumer payments.

It is therefore time for the regulator to stop acting merely as a mediator between two cats sharing the same cream and instead reclaim its role as the protector of consumer interest.

The current Consultation Paper (CP) is yet another example of how broadcasters and DPOs successfully divert the regulator's focus from the real issues affecting consumers. The recurring debates around audit, reporting or other inter-operator disputes are nothing more than a smokescreen, serving to create a façade of conflict between the two segments. In reality, both operate in tandem, using such narratives to distract regulatory attention while continuing to exploit subscribers through unjustified charges, forced bouquets and declining content value.

Accordingly, we make the following specific submissions for consideration:

A. Ad-Free Pay Channels

Pay channels, which are already priced at the discretion of broadcasters, must be completely ad-free. If broadcasters wish to earn through advertisements, such channels should be categorized as *Free-to-Air (FTA)*.

B. Prohibition of Bouquets

Both broadcasters and DPOs should be barred from offering pay channels in bouquets. Their consistent failure to uphold the principle of consumer choice clearly demonstrates that bouquet formation serves only to push unwanted channels and maximize advertisement revenue.

C. Mandatory Availability of All FTA Channels Free of Cost

All Free-to-Air (FTA) channels should be made available to subscribers without any access fee or hidden charges, ensuring universal and unrestricted access to public. This would make FTA channels truly free to subscribers, consistent with the fundamental principle of non-discriminatory access and public interest.

D. Elimination of Access Fees and Network Charges

The continued levy of Network Charges or any access-related fee has become wholly unjustified. The cost of equipment and infrastructure has already been recovered by DPOs from the subscribers. Moreover, DPOs routinely fail to collect or deactivate such equipment long after subscriber suspension or disconnection, further underscoring that these fees serve no legitimate purpose. The access fee, therefore, must be abolished entirely to prevent undue consumer burden.

It is deeply concerning that consumer choice remains elusive while the ecosystem continues to reward only broadcasters and distributors. It is therefore imperative for TRAI to reorient its regulatory focus towards the consumer, restoring balance and fairness in the broadcasting value chain.