

Fwd: Request for Comments on Draft Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Seventh Amendment) Regulations, 2025

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

Tue, 07 Oct 2025 10:20:46 AM +0530

To "Bhupendra Singh"<srobcs2@traf.gov.in>,"Sanyatjeet Pawde"
<s.pawde@traf.gov.in>,"Ajay Kumar"<interconnect-bcs@traf.gov.in>

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

From: Netset Media Services Pvt. Ltd. <netsetmedia@gmail.com>

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

Cc: <sattvik.lavaniya@traf.gov.in>

Date: Mon, 06 Oct 2025 16:23:39 +0530

Subject: Fwd: Request for Comments on Draft Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Seventh Amendment) Regulations, 2025

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

To,
Sattvik Lavaniya,
Telecom Regulatory Authority of India (TRAI)
New Delhi/JAIPUR

Respected Sir/Madam,

I am writing to draw your kind attention to certain operational and regulatory challenges being faced by small and medium-sized Multi System Operators (MSOs) with limited subscriber bases.

While we fully support TRAI's objective of ensuring transparency and accountability in the cable distribution ecosystem, we wish to highlight some genuine difficulties faced by smaller MSOs in complying with the mandatory audits prescribed under **Clauses 15(1) and 15(2)** of the Interconnection Regulations.

1. Disproportionate Burden on Small MSOs

For MSOs having **less than 20,000 active connections**, the cost and procedural complexity of mandatory audits under Clauses 15(1) and 15(2) are disproportionately high. These MSOs typically operate in smaller towns and rural areas with limited manpower and modest revenue. The expenditure involved in hiring auditors, preparing technical and financial reports, and meeting repeated broadcaster audit requests often exceeds their operational margins.

Hence, we kindly request TRAI to **introduce slabs or threshold-based exemptions**, such that:

- MSOs with fewer than **20,000 connections** are exempted from mandatory audits under Clauses 15(1) and 15(2).
- Alternatively, such MSOs may be allowed to submit **self-certification reports or simplified audit statements** as a compliance mechanism.

2. Misuse of Clause 15(2) by Broadcasters

In recent times, several MSOs have been facing undue pressure from broadcasters who are invoking Clause 15(2) at arbitrary intervals, without reasonable timelines or specified audit frequency.

This practice results in:

- Repeated audit requests without any cooling-off period or justification.
- Significant administrative and financial strain on small MSOs.
- Operational disruption and harassment under the guise of audit rights.

While we understand broadcasters' right to seek audits, **there is currently no clear guideline or time-gap defined between successive 15(2) audit requests**, leading to possible misuse of this provision.

We therefore request TRAI to consider issuing **specific rules and timelines** governing Clause 15(2) audits, such as:

- Limiting the frequency of such audits (e.g., not more than once in a financial year).
- Mandating valid and documented reasons before initiating any 15(2) audit.
- Requiring broadcasters to coordinate through a transparent and time-bound audit process.

Conclusion

These measures will greatly help protect small and medium MSOs from unnecessary compliance harassment, while maintaining transparency and accountability within the ecosystem.

We sincerely request TRAI to take cognizance of this issue and frame appropriate regulatory safeguards for smaller operators.

Thank you for your attention and continued efforts toward ensuring a fair and balanced regulatory framework for all stakeholders.

Warm regards,

JITENDRA GANATRA

NETSET MEDIA SERVICES PVT.LTD.

JAMNAGAR

GUJRAT

INDIA

On Wed, Oct 1, 2025 at 1:03 PM Sattvik Lavaniya <sattvik.lavaniya@traf.gov.in> wrote:

To

All MSOs of Gujarat, Haryana, Rajasthan and Punjab

Dear Sir/Madam,

With reference to the email dated 26.09.2025 (email attached) from TRAI HQ, Telecom Regulatory Authority of India (TRAI) has released the Draft Telecommunication (Broadcasting

and Cable) Services Interconnection (Addressable Systems) (Seventh Amendment) Regulations, 2025 on 22nd September 2025 for seeking comments from the MSOs.

The Draft Regulations along with the Press Release are available on TRAI's website and are also attached herewith for your reference. **The last date for submission of comments is 06th October 2025.**

You are requested to kindly go through the draft regulations in detail and furnish your suggestions within the stipulated timeline. The comments may be forwarded to jtadv-bcs@traigov.in with cc to sattvik.lavaniya@traigov.in.

With Regards
Sattvik Lavaniya
Consultant (Young Professional -Tech)
TRAI RO Jaipur

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Netset Media Services Pvt. Ltd
Jamnagar

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