

# **Cable Operators Federation of India**

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**Without Prejudice**  
(by Speed Post/E-mail)

Ref/COFI/TRAI/08/ 2016

Dated: 20 October 2016

The Chairman,  
Telecom Regulatory Authority of India,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg  
New Delhi-110002

**Kind Attn: Mr. Sunil Kumar Singhal, Advisor (B&CS) and Mr G S Kesarwani**

**Sub: Comments on TRAI Consultation Paper No 20 of 2016 on Infrastructure sharing in broadcasting TV distribution sector dated 21<sup>st</sup> September, 2016**

Dear Sir,

Reference your Consultation Paper on Infrastructure sharing in Broadcasting TV distribution sector dated 21<sup>st</sup> September, 2016.

We welcome the TRAI consultation paper on Infrastructure sharing in Broadcasting TV Distribution sector at a time when it is needed the most. This paper brings an opportunity for the industry to think together and cooperate at all levels to the welfare of all the stake holders and provide the best service, choice at an economical manner to the consumer. With digitisation, great amount of expenses are being incurred by every stake holder in the distribution networks. Sharing of infrastructure can really help to ease the situation reducing the Capex to a great extent.

The industry needs to think together that how all the stake holders can survive together and provide consumers the choice which has been missing in the industry in the last five years of Digitisation. Moreover, consumer is forced to pay higher subscription every month Pay

broadcasters are still ruling the roost forcing their bouquet of channels on consumers and demanding huge subscriptions.

**Recognise cable TV network as a telecom Infrastructure.**

**One important aspect for the growth of the industry is its recognition as a National Telecom Infrastructure**, completely distanced from its role of providing TV channels so that it can grow as a convergence network.

Benefits of sharing the infrastructure can only be achieved if **both broadcasting and telecom networks share each other's infrastructure**. At present this is not so. We have failed to create a convergence infrastructure in the country.

**Let us not forget that cable TV provides the largest last mile network for converged services but it is not being used as one.** Telecom networks do not have a robust wireline infrastructure so our broadband penetration remains very low. Wireline Telecom networks in Rural areas are nonexistent. To increase connectivity, telecom companies are resorting to mobile networks which are bogged down with bandwidth issues apart from the shortage of spectrum. Even voice communications do not meet quality standards.

**One of the reasons of delay in implementing digitisation is framing of policies that do not allow infrastructure sharing.** Every cable TV network, big or small is expected to create same infrastructure of more than 250 TV channels irrespective of the need, forced to invest to the extent the network becomes unviable discouraging small and medium networks to continue with the business.

This problem of economic unviability of Digitisation is more prominent in Phase III and IV where most of the networks are small and no telecom infrastructure exists to connect these small networks. These operators do not have the resources to build large scale Digital cable networks and even the large MSOs are not interested in laying their networks in these far flung areas as returns are not adequate. **Government needs to subsidise the networks in these areas like it does for BharatNet (NOFN) Project.**

Yours Faithfully,

Roop Sharma  
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