



**KERALA VISION
DIGITAL TV**

ISO 9001 : 2008 COMPANY

KERALA COMMUNICATORS CABLE LTD.

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23rd September 2019

To

The Secretary

Telecom Regulatory Authority of India

Mahanagar Doorsanchar Bhawan

Beside Zakir Hussain College

Jawahar Lal Nehru Marg (Old Minto Road)

New Delhi

Dear Sir,

Sub:- Written Comments on the New Regulatory Frame Work Consultation Paper from Kerala Communicators Cable Limited

With respect to the Consultation paper and the comments asked for various issues please find below our answer to each questions.

Summary of Issues for Consultation

Q1. Do you agree that flexibility available to broadcasters to give discount on sum of a-la-carte channels forming part of bouquets has been misused to push their channels to consumers? Please suggest remedial measures.

KCCL ANS:- No

Q2. Do you feel that some broadcasters by indulging in heavy discounting of bouquets by taking advantage of nonimplementation of 15% cap on discount, have created a non-level field vis-a-vis other broadcasters?

KCCL ANS:- NO

Q3. Is there a need to reintroduce a cap on discount on sum of a-lacarte channels forming part of bouquets while forming bouquets by broadcasters? If so, what should be appropriate methodology to work out the permissible discount? What should be value of such discount?

KCCL ANS:- NO



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Q4. Is there a need to review the cap on discount permissible to DPOs while forming the bouquet? If so, what should be appropriate methodology to work out the permissible discount? What should be value of such discount?

KCCL ANS:- NO

Q5. What other measures may be taken to ensure that unwanted channels are not pushed to the consumers?

KCCL ANS:- If a Channel is FTA and existing Channels are to be paid channels, the minimum pricing of channel should be 2 Rupees

Q6. Do you think the number of bouquets being offered by broadcasters and DPOs to subscribers is too large? If so, should the limit on number of bouquets be prescribed on the basis of state, region, target market?

KCCL ANS:- Yes. The Broadcaster Bouquet will be 20% of their actual A-LA-CARTE Channels and the DPO bouquet is the same % according to the Network Capacity

Q7. What should be the methodology to limit number of bouquets which can be offered by broadcasters and DPOs?

KCCL ANS:- 20% of the total channels

Q8. Do you agree that price of individual channels in a bouquet get hedged while opting for a bouquet by subscribers? If so, what corrective measures do you suggest?

KCCL ANS:- No

Q9. Does the ceiling of Rs. 19/- on MRP of a a-la-carte channel to be part of a bouquet need to be reviewed? If so, what should be the ceiling for the same and why?

KCCL ANS:- Yes. The Maximum price should be Rs. 10/- to be part of Bouquet. Those channels priced above Rs. 10/- should only be A-LA-CARTE and not allowed to be part of Bouquet.

Q10. How well the consumer interests have been served by the provisions in the new regime which allows the Broadcasters/Distributors to offer bouquets to the subscribers?

KCCL ANS:- Distributors can make a bouquet only with the broadcaster packages because when we take Broadcaster A LA CARTE the premium channel would be Rs. 19/- and the consumers won't be benefitted. For the Consumers to be benefitted it has to be Rs. 10/-





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Q11. How this provision has affected the ability and freedom of the subscribers to choose TV channels of their choice?

KCCL ANS:- The Main objective of NTO is to give the consumers the power to choose channels they wish to see periodically. But to choose A la carte is difficult. The DPO Packages are made as per the Regional interests and mainly happy with the DPO Packages.

Q12. Do you feel the provision permitting the broadcasters/Distributors to offer bouquets to subscribers be reviewed and how will that impact subscriber choice?

KCCL ANS:- The Minimum pricing to be in Pay Format should be Rs. 2/- and Maximum pricing should be Rs. 10/-

Q13. How whole process of selection of channels by consumers can be simplified to facilitate easy, informed choice?

KCCL ANS:- The best way to simplify the process is to implement DPO Regional Packages. 85% and more customers would be happy.

Q14. Should regulatory provisions enable discount in NCF and DRP for multiple TV in a home?

KCCL ANS:- No

Q15. Is there a need to fix the cap on NCF for 2nd and subsequent TV connections in a home in multi-TV scenario? If yes, what should be the cap? Please provide your suggestions with justification.

KCCL ANS:- No

Q16. Whether broadcasters may also be allowed to offer different MRP for a multi-home TV connection? If yes, is it technically feasible for broadcaster to identify multi TV connection home?

KCCL ANS:- No

Q17. Whether Distributors should be mandated to provide choice of channels for each TV separately in Multi TV connection home?

KCCL ANS:- Yes. If there are Multiple STB's in a Home, One STB can have DPO packages/ other packages and the other also can have different packages.





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Q18. How should a long term subscription be defined?

KCCL ANS:- Subscription for 1 year may be termed as Long Term Subscription

Q19. Is there a need to allow DPO to offer discounts on Long term subscriptions? If yes, should it be limited to NCF only or it could be on DRP also? Should any cap be prescribed while giving discount on long term subscriptions?

KCCL ANS:- No

Q20. Whether Broadcasters also be allowed to offer discount on MRP for long term subscriptions?

KCCL ANS:- No

Q21. Is the freedom of placement of channels on EPG available to DPOs being misused to ask for placement fees? If so, how this problem can be addressed particularly by regulating placement of channels on EPG?

KCCL ANS:- No

Q22. How the channels should be listed in the Electronic Program Guide (EPG)?

KCCL ANS:- In EPG the Channels should have MRP and the Channel list should be in Genre with Regional Language.

Q23. Whether distributors should also be permitted to offer promotional schemes on NCF, DRP of the channels and bouquet of the channels?

KCCL ANS:- No

Q24. In case distributors are to be permitted, what should be the maximum time period of such schemes? How much frequency should be allowed in a calendar year?

KCCL ANS:- No Comments

Q25. What safeguards should be provided so that consumers are not trapped under such schemes and their interests are protected?

KCCL ANS:- No Comments





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Q26. Whether DPOs should be allowed to have variable NCF for different regions? How the regions should be categorized for the purpose of NCF?

KCCL ANS:- Yes. The Regions may be classified as Urban, Sub Urban and Rural. For Urban NCF for 100 Channels may be fixed at Rs. 130/-, for Sub Urban NCF for 100 Channels Rs. 150/- and NCF for 100 Channels Rs. 170/- for Rural Consumers

Q27. In view of the fact that DPOs are offering more FTA channels without any additional NCF, should the limit of one hundred channels in the prescribed NCF of Rs. 130/- to be increased? If so, how many channels should be permitted in the NCF cap of Rs.130/-?

KCCL ANS:- 125-150 Channels to be included at a price of Rs. 150/- including the 25 DD Channels. If this is the case the Urban NCF for 150 Channels may be fixed at Rs. 150/-, for Sub Urban NCF for 150 Channels Rs. 170.00 and Rs. 190/- as NCF for 150 Channels for Rural Consumers

Q28. Whether 25 DD mandatory channels be over and above the One hundred channels permitted in the NCF of Rs. 130/-?

KCCL ANS:- Yes. DD can be added and NCF made as Rs. 150/-

Q29. In case of Recommendation to be made to the MIB in this regard, what recommendations should be made for mandatory 25 channels so that purpose of the Government to ensure reachability of these channels to masses is also served without any additional burden on the consumers?

KCCL ANS:- DD Channels with regional and national importance alone to be made mandatory instead of all the 25 Mandatory DD Channels.

Q30. Stakeholders may also provide their comments on any other issue relevant to the present consultation.

KCCL ANS:- Basically in the Current Tariff Order, the DPO (Including the LCO) Commission from Pay Channel is only 20%. In Every value Chain the Maximum cost is for Distribution and the average cost of distribution would be 60%. So in the Current Tariff Order the minimum commission from broadcaster should be 40% and additional 20% for penetration of the channels into Target Market. This would make the DPO Packages more attractive.

**Warm Regards,
For Kerala Communicators Cable Limited**

**Don Parakkal
Manager**

