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**Fwd: Comments on trai consultation paper.**

1 message

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**V K Agarwal** <vk.agarwal@trai.gov.in>  
To: Vinay Yadav <vinay.yadav0512@gmail.com>

Sun, Feb 3, 2019 at 6:51 PM

----- Original Message -----

From: **Praful Gharpure** <praful.gharpure@gmail.com>

Date: Jan 2, 2019 1:04:45 PM

Subject: Comments on trai consultation paper.

To: arvind@trai.gov.in

Cc: vk.agarwal@trai.gov.in

**Greetings**

In light of current situation of subscribers in our country the initiative of TRAI to regulate channel subscription charges is very welcome move. However with challenges at hand the wider consensus on matter shall remain an issue leading to mist surrounding subject leading to state of confusion in minds of majority of subscribers. Since the consultation paper gives opportunity to share comments I am sending herewith a concept of charge based on view time ,

Regards

Dr.Praful Gharpure

Nagpur

**Writeup as below.****A. Situation on ground**

The channels are projecting advts during the programs and charge good sum from the agency putting add , further the add takes almost 30% of time of viewer during program . As a pay channel the subscriber is charged addl amount for viewing. In a single day 24 hr telecast offers 1440 minutes of time on each channel and on an average the advertisement time is 432 minutes i.e. 30% of the time.

On the other hand on average an advertiser pays anywhere upto 1.5 million rupees for a 30 second commercial on primetime. Along with other costs for content at channel , statutory charges , infrastructure setup etc , it is strongly felt that these advt charges can cross subsidise these leaving channel to offer potentially free or at significantly low cost.

**B. The Subscriber fees**

Considering the above there is a good chance for offer to subscriber to pay for time he watches , for which tariff can be standardised.

**C. The Option**

Leveraging the best practices mobile phone charging model can help giving some respite to the viewer. "Talk time" concept has been widely used in mobile world especially amongst prepaid subscribers. With digitization of cable industry, stage is set for a competition time synonymous to the mobile phone. In such a situation concept of "View time" is a potential solution to save the cost of 432 minutes for which a user is not willing to pay but has to pay. All the features of Talk time line balance carry forward can be applied to view time.

The DTH providers have the technology to upgrade these set top boxes to be able to record and decode the actual view time of subscriber to be able to charge him on basis of what he views. This will also provide meaningful information to advertisers on viewer ship pattern to be able to put their commercials appropriately.

This also complements to the BARC approach on analysing the viewing patterns of users and deriving the appropriate policy on pricing. .

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