

Sub: Comments against TRAI consultative paper dtd.  
Ref: THE DTH SERVICES (STANDARDS OF QUALITY OF SERVICE AND REDRESSAL OF GRIEVANCES)  
REGULATIONS, 2007. NO. 8 of 2007 Notified by TELECOM REGULATORY AUTHORITY OF INDIA vide  
NOTIFICATION Dtd. 31<sup>st</sup> August, 2007

## **For Direct to Home Broadcasting Services:**

**4.1.5 Whether the DTH operators should be specifically prohibited from dropping of channels from a subscription package for a subscriber for six months from the date of enrolment of that subscriber, if the channel continues to be available on their platform.**

MY OPINION: YES, IT IS APTLY JUSTIFIED IF THE CHANNEL CONTINUES TO BE AVAILABLE IN SOME OR THE OTHER PACKAGE ON THEIR PLATFORM IRRESPECTIVE OF WHETHER ANY PAYMENTS DIRECT/INDIRECT ARE MADE TO THE BROADCASTER. HENCE THIS SHOULD BE APPLICABLE EVEN FOR FREE TO AIR CHANNELS & NOT JUST PAY CHANNELS.

ALTERNATIVELY TO LIMIT THE SCOPE THE USERS/DTH OPERATORS MAY INDICATE 25% OF THE PAID/FTA CHANNELS WHICH CANNOT BE DROPPED IN A 6 MONTH TIME FRAME

**4.1.6 Within this period of six months, in case the channel ceases to be available on a particular DTH platform, then whether it would be appropriate to have a mechanism of reducing the subscription charges by an amount equal to the wholesale a-la-carte rate of that channel. Alternatively, can you suggest any other methodology for such compensation to the subscriber? Should such compensation be paid/adjusted even when one channel in a package is dropped, and it is replaced/substituted by another channel so that the total number of channels in that package is not affected?**

MY OPINION: IN CASE THE TERMINATION IS DUE TO UNCONTROLLABLE FACTORS FROM DTH SERVICE PROVIDER END, A REPLACEMENT CHANNEL CAN BE ALLOWED. IN ALL OTHER CASES THE SUBSCRIPTION SHOULD BE REDUCED BY THE AVERAGE CHANNEL SUBSCRIPTION FEE FOR ONE NON FTA CHANNEL.

**4.1.7 Whether the subscribers should also be required to subscribe to any channel/ package for a certain minimum subscription period as in CAS areas. If yes, what should be such minimum subscription period?**

MY OPINION: 3 MONTHS FOR LOW PRICED CHANNELS & ONE MONTH FOR HIGH PRICED CHANNELS

**4.1.8 Whether there is any justification for visiting charges for "no signal" complaint by the subscribers? If yes, should there be a ceiling on such visiting charges for complaints of "no signal"?**

**4.1.9 Similarly, should any ceiling be placed in respect of visiting charges for repair and maintenance of CPE for DTH services? Alternatively, should DTH operators be required to offer Annual Maintenance Contracts (AMCs) to their subscribers?**

MY OPINION: ONLY IF THE CPE IS OWNED BY THE SUBSCRIBER, THERE CAN BE AN ALL INCLUSIVE ANNUAL FEE OF NOT MORE THAN ONE MONTH CHARGES APPLICABLE FOR THE CHEAPEST MANDATORY PACK OFFERED. IN OTHER CASES THERE IS NO JUSTIFICATION

**4.1.10 Can you suggest some form of AMCs for DTH Service covering all aspects such as repair & maintenance charges for CPE, visiting charges, attending "no signal" complaints, etc.?**

MY OPINION: IF CPE IS ON OWNERSHIP BASIS ANNUAL AMC ALL INCLUSIVE SHOULD BE PROVIDED BY DTH PROVIDER AT COST NO MORE THAN AN ANNUAL FEE LIMITED TO MINIMUM BASIC STARTER PACK FEE FOR ONE MONTH

**4.1.11 Whether the service providers should be required to make available toll-free numbers for recharge calls for prepaid accounts?**

MY OPINION: ABOLUTELY YES FOR ALL RECHARGE , COMPLAINTS FOLLOW UP

**4.1.12 Whether the request for suspension of service for full calendar months only should be entertained?**

MY OPINION: MINIMUM ONE MONTH

**4.1.13 Whether tariff plan or subscription package changes requested by the DTH subscriber should be accepted and implemented immediately or from the start of next billing cycle for DTH subscriber.**

MY OPINION: SHOULD BE ACCEPTED AND IMPLEMENTED IMMEDIATELY. BUT TO BE BILLED ON A PRORATA BASIS IN THE NEXT FULL MONTH BILL

**4.1.14 Whether advance notice of minimum 30 days should be given by DTH operators to a DTH subscriber before terminating his existing tariff plan provided that no tariff plan can be terminated within the contracted period, if any, for that package or within six months of enrolment of that subscriber to that package.**

MY OPINION: NO IT CAN BE TERMINATED AFTER 6 MONTHS OF ENROLMENT. BUT IT CAN BE TERMINATED FOR REASONS BEYOND CONTROL LIKE CLOSURE OF CHANNEL FROM BUSINESS ETC & IN SUCH CASES SIMILAR REPLACEMENT CHANNEL TO BE PROVIDED AT NO EXTRA COST TILL NEXT RENEWAL OF SUBSCRIPTION