

Subject: **Respond to the consultation Paper**

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Date: 09/23/19 11:02 AM

From: Manikandan Rajendran <nima7683@gmail.com>

Dear sir

I am R.Manikandan from Taminadu It is pleasure to know that due care is taken to implement the NTO in a right way by the authority Here I wish to respond some of the questions raised by the authority upto my capacity Please consider it.

First of all I personally thanks to TRAI for the NTO implementation, which is the only remedy to this unorganized sector.

Rather give answers to all the questions I lay down my views to some questions which I feel relevant to respond my concern.

Q1.Has a-la-carte to bouquet price flexibility been misused by broadcasters? Remedial Measures.

Yes. Broadcasters misused their privilege to form bouquets. Enough reasons are discussed in the consultation paper itself. The remedial measures can be arrived when the bouquet making power is given to consumer.

Q2.Has heavy bouquet discounting (more than 15%)by some broadcasters, put other broadcasters at a disadvantage? Yes.

Q3.Should the 15% cap on a-la-carte to bouquet prices be reintroduced? How should the cap be calculated?

Yes. The cap can be calculated the bouquet choose by the consumer. As we earlier discussed, only consumer can make bouquet, upto 5 channels can be offered 15% and more than 5 channels it may be 25%.

Q4.Should there be a cap on discounting by DPO's? How should it be calculated?

No one should permit to form bouquet other than consumers.

This may be the only way to eliminate confusions made by Broadcasters & DPOs.

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

There is no question arises regarding unwanted channels, when consumers are making their own bouquet.

Q6.Are broadcasters and DPOs offering too many bouquets? How should they be limited? (State,region,target market?)

Yes. While consumers choose their own bouquets automatically bouquets will be limited.

Q7.Should the Rs.19 ceiling on MRP a-la-carte for bouquets be reviewed? To what?

Yes. Rs 5 ceiling should be introduced on MRP if the channel want to be included in the consumer bouquet

Q8. Have consumer interests been served by bouquets in the NTO?

No. Bouquet made by broadcasters and DPOs are of their interest not for consumer interest. As discussed in the consultation paper itself unwanted channels are included and forced consumer to go for the bouquet which is cheaper than a-la-carte.

Q9.Have bouquets affected consumers' freedom to choose TV channels of their choice?

Yes. Broadcasters & DPOs bouquets affected consumers freedom. The whole NTO's aim is to give freedom to consumers to choose the channels they wanted, but the bouquet scenario made by broadcasters and DPOs give partial freedom instead of full freedom.

Q10.How should the entire process of selection of channels by consumers be simplified?

Full freedom should be given to the consumers to make their own bouquets. Complicated process made by the broadcasters &DPOs will automatically be simplified.

Q11.Change regulation to allow discounts in NCF and DRP for multiple STBs in a home?

No. There shouldn't be any discounts in NCF and DRP., The only income source of LCOs depend on the NCF and DRP. To maintain QoS cost is same for the additional STB .The case may be different for DTH , So no discount should be allowed.

Q12.Whether DPOs should be allowed to have variable NCF for different regions? How the regions should be categorized for the purpose of NCF?

As per as the number of channels are concern Yes, but No for the price is concerned. It will directly affect the LCOs income.

Q13.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/-?

There can be two NCF. One for Rs100/- and another Rs 130/-

Rs 100 NCF should consist 100 channels+DD Mandatory channels

Rs 130 NCF should be more than 100 channels+DD Mandatory channels.

Q14. Whether 25 DD mandatory channels be over and above the One hundred channels permitted in the NCF of Rs. 130/-?

DD Mandatory Channels may be added additional to 100 FTA Channels.

Q15.Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Unlike DTH the cableTV business is depend mainly on LCOs for ground distribution.

To maintain QoS and to collect subscription fee The LCOs spent more money now a days. ARPS not increased but diminished in the NTO region. LCOs have no choice other than to rely on the NCF &DRP share as per their agreement with the DPOs. Meanwhile DPOs &Broadcasters are giving huge discount on NCF & Bouquets without LCOs concern which affect badly their income.

To simplify the whole things I as a LCO and a Consumer suggest that

1. Only Consumer can make bouquets. Neither broadcasters nor the DPOs are permit to make bouquets.
2. The a-la-carte price should be less than Rs 5 if it wants to include on consumer's bouquet.
3. There should be two NCF one for Rs100/- and another Rs130/-.
4. The whole NCF should be given to LCOs as they are responsible for ground distribution and QoS.
5. There shouldn't be any discount on the NCF.
6. More DD Channels Should be compressed in one transponder so that DPOs network cost cut

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