

**SITI NETWORKS LIMITED COMMENTS TO THE CONSULTATION PAPER ON
“EASE OF DOING BUSINESS IN BROADCASTING SECTOR”**

At the outset, we would like to congratulate the Authority for coming up with consultation paper on “Ease of Doing Business in Broadcasting Sector”. The Authority has put in sincere efforts in coming up with the consultation paper and we welcome the efforts of the authority in ensuring a level playing field in regulated environment to all the stakeholders.

Q9. What are the specific issues affecting ease of doing business in cable TV sector? What modifications are required to be made in the extant framework to address these issues? Give your comments with justification.

Ans:-

Infrastructure Sharing

As a mandatory requirement every MSO has to setup his own digital headend, CAS, SMS, Encryption, Website, Call Centre with Toll Free number, Web based complaint monitoring system etc. Apart from this they have to arrange for the distribution infrastructure either owned or leased. This is cumbersome for smaller entities and require a huge investment, cost of which makes it difficult for any MSO to operate and make further investment. The distribution margin does not allow to maintain all of the above in a profitable manner. To overcome the same, it is imperative to allow infrastructure sharing in the cable TV sector.

Right of Way

Despite various communication from the Ministry of Information and Broadcasting, this issue of Right of Way is still unresolved and local/municipal/authorities/boards etc. does not co-operate with MSOs to allow them build or develop their service network. Getting these approval is very costly affair and some times annual charges by the local bodies itself make the business unviable. The Authority must recommend guidelines for issue of Right of Way to the MSOs on standard terms.

Q10. Is there a need to increase validity of LCO registration from one year? In your view, what should be the validity of LCO registration? Give your comments with justification.

Ans:-

Cable Operator's Registration

The validity of the LCO registration should be increased to minimum 5 years or in line with the MSO registration of 10 years. This will help the LCOs to maintain their network for a larger life cycle and will remove the unwanted pressure of renewal of the registration every year.

The registration of cable operators under Cable TV Act' 1995 is done by the post office authorities. We have noticed that most of the post offices are not punctual in issuing registration certificates and in some cases post office authorities even do not accept the application for various reasons. In some states they still rely on the old regime wherein they used to ask for the clearance from the Entertainment Tax Authorities for renewal of the registration.

In fact the LCO registration process should also be centralized with Ministry of Information and Broadcasting similar to the MSO registration. The online database will help in ascertaining the validity of the registration of the cable operators and as well provide authentic record of cable operators PAN India.

It will also help the authorized officers to take necessary action against the defaulters who do not renew their registration and continue to operate.

Q15. Is there any other issue which will be relevant to ease of doing business in broadcasting sector? Give your suggestions with justification.

Ans:-

Access to Content

Content should be available to all platforms on non-discriminatory basis to ensure transparency and level playing field to all stakeholders. Pricing of the content should be platform neutral which is the policy and vision of TRAI also. There is a tendency to price content differently i.e. free or pay for different platforms, which shakes investor's confidence and create discrimination between platforms.