

Subject: **Consultation paper on Tariff related issues for Broadcasting and cable services**

To: "arvind@traf.gov.in" <arvind@traf.gov.in>,
"vk.agarwal@traf.gov.in" <vk.agarwal@traf.gov.in>

Date: 09/06/19 09:59 AM

From: Samir Kumar Hore <samirkumarhore@rediffmail.com>

Dear sir,

We submit our views briefly as under:

As to issue no 1: When there will be a flexibility, it is subject to be used in varied manner by different business entity, it cannot be termed as misuse unless it directly objects to any laid down principles, for which the regulator can act as per set rules. As for a viewer he deserves good competition amongst all stakeholders and if all business entities are offering discounts on sum of a-la-carte channels then it must not be seen as a misuse by them.

As to issue 2: The logic behind putting a cap of 15% on discount will affect the viewers in the long run and as such the regulator must not think of a logic of imposing such a cap, as no rationale is seen in this. In the international scenario, the market forces governs and decides a balance between demand and supply so such a cap prima facie with no rationale should not be imposed.

As to issue 3: In the same logic as to issue 2, no such logic can be applicable from regulator side, India is a land of diversity, and as such based on regional or other factors cannot be used by the regulator to regulate.

As to issue 4: As discussed at issue 2 and 3, no intervention is desired by the regulator.

As to issue 5: Ensuring unwanted channels are not pushed on to the customers:

a. Directives be issued all service providers that like in a voting process, those candidates who fail to get minimum votes gets their deposits surrendered to the Election commission, similarly those channels served in bouquet who fail to attract a minimum % of viewership in terms of time duration and reach to customers, the regulator can have an option to get those channels removed from the bouquet offered by the service providers, and the premium price of such bouquets will be reduced as below:

A service provider is offering a pack of 10 channels at a la carte prices of Rs 19, 17, 10, 5, 3, 2, 0.1, 0.1, 1, 8, totalling to Rs 65.2 at a special price of Rs 29.

If, the channel priced at Rs 0.1 fails the criteria and regulator needs to delete it from the a la carte pack, then reduction in the bouquet prices will be not Rs (29- 0.1), but Rs $\{29 * [1 - (29/65.2)/10]\}$. If a channel which is high value like Rs 10 fails, then the service provider will ensure corrective action automatically.

This will keep a check on service providers to provide quality content attractive and desirable to viewers and they will try to sustain the viewership, and such strategy to

include unwanted channels will get discouraged.

b. To keep this approach effective, you may add a regulation that service providers who introduces a bouquet of channels will not be able to withdraw it in a financial year comprising of twelve months and the review of channels not able to attract minimum standard of viewership will be reviewed on every two month basis and therefore the resultant reduction in cost of bouquet prices will have to be borne by service providers and they gets penalised and viewers who were forced to pay initially gets the fruit later.

c. Channel providers will surely review their stand more frequently and thereby try to increase the customer viewership base and in this competition, the viewer wins.

Issue 6 to 8: As discussed above, no intervention is desired by the regulator except as above.

Issue 9: Typically any Indian family caters to three generation of people, the elders who are enjoying retired life wants devotional channels, news, family entertainment etc. The working class requires news, business related information, The teenagers and smaller ones require entertainment, music, educational channels, and cartoons etc. Not a single ala carte channel can be found who covers the needs of such varied request, so one needs to resort to several pay channels each priced on the higher range towards Rs 19. The bouquets try to bring the demands in a basket, so carrying 3 to 4 baskets caters to the needs, however each content of each basket is not desired, so elimination of unwanted components in the baskets can be achieved as discussed in issue 5 above, however the rational of fixing cost of each channel at a maximum of Rs 19 is not clear, and this cost may be further made to go down.

Issue 10 to 17: Indian traditions are family oriented, as such there are many outside distractions to encourage loneliness and individualism so ti may be not encouraged to allow discounts for multi connections to a given home.

Issue 18 to 20 : Long term subscription can be defined by service providers provided the regulator can frame a rule in terms of Issue 5 above.

Issue 21, 22: No comments

Issue 23 to 25: Yes. But similar to issue 5, the viewership in terms of time duration and viewership base may be done and the ones not getting favourable response be discarded and those getting favourable response be allowed and encouraged.

Issue 26 to 29: no comments

Issue 30: Imposition of GST on the initial price of Rs 130 may be reviewed and got withdrawn.

Hope sincerely that our views will be appreciated and got implemented.

Thanking You.

Samir Kumar Hore and Rita Hore

Kolkata