

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

From: **Srivatsa Gorur** <[gsvatsa@gmail.com](mailto:gsvatsa@gmail.com)>

Date: Aug 10, 2019 7:14:51 PM

Subject: Comments on Draft (Second Amendment) to The Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations 2017

To: [sumeet@tra.gov.in](mailto:sumeet@tra.gov.in), [arvind@tra.gov.in](mailto:arvind@tra.gov.in)

Dear Sir/Madam,

I fully support TRAI's API initiative which is in the right direction to free customers from the shackles of DPOs and truly empowers them to be in complete control. I had also requested for this to be done when I sent my comments on the Channel Selector application.

On the draft regulations, I have following comments on the APIs provided:

1. Section 19 should have one more error code for Channel is in Lock-in Period as cable operators have a lock-in period of a month or more i.e. once a channel is subscribed it cannot be changed till the lock-in period expires
2. Section 18 Subscription Status API needs to be more granular and should provide the status wrt each channel in the Subscription Request. This is because some channels in the request may be rejected due to lock-in period while the others could be changed. An overall status of the subscription status like Accepted/Partially Accepted/Rejected is needed to handle such cases.
3. Section 21 No. V point is retrograde and does not encourage innovation. Third Party Apps must be allowed to securely store subscription data. By enabling this, third party apps can provide recommendations to improve the viewing experience using Big Data Analytics in a cost effective manner. Also, this would encourage third party applications to generate independent insights that can be shared with TRAI and broadcasters for future policy actions.