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Our Comments on Consultation Paper on
"ISSUES RELATED TO IMPLEMENTATION OF DIGITAL ADDRESSABLE CABLE TV SYSTEMS" Dt. 22nd December 2011.

Basic Service Tier for the Digital Addressable Cable TV Systems

Q1. What should be the minimum number of free-to-air (FTA) channels that a cable operator should offer in the basic-service-tier (BST)? Should this number be different for different states, cities, towns or areas of the country? If so, what should be the number and criteria for determination of the same?

BST should have at least 60 channels and it should be same for entire India. Regional Channels of the operating area should be part of BST of that area.

Q2. In the composition of BST, what should be the genre-wise (entertainment, information, education etc.) mix of channels? Should the mix of channels and/or the composition of BST be different for different states, cities, towns? If so, how should it be?

Choice of channels should be left to market / area.

Q3. What should be the price of BST? Should this price be different for different states, cities, towns or areas of the country? If so, what should be the price and criteria for determination of the same?

Price of BST should be at least Rs.150/- , anything below it would make business unviable for LCO.

Q4. What should be a-la-carte rate of channels that form part of BST? Should there be a linkage between a-la-carte rate of channels in the BST to the BST price or average price of a channel in the BST? If so, what should be the linkage and why?

BST is consists of only FTA channels to caters needs of all types of subscribers, putting price on it would dilute the purpose of the package. In case subscriber want to avail any FTA not included in BST, MSO may take service charge @ 5/- per channel.

Retail Tariff for the Digital Addressable Cable TV Systems

Q5. Should the retail tariff be determined by TRAI or left to the market forces? If it is to be determined by TRAI, how should it be determined?

It should be left to market force.

(a) Should the a-la-carte channel price at the retail be linked to its wholesale price? If yes, what should be the relation between the two prices and the rationale for the same?

Let MSO/ Individual to negotiate for wholesale price

(b) Should there be a common ceiling across all genres for the pay channels or different ceilings for different genres? What should be the ceilings in each case and the reasons thereof?

It should be left to market force.

(c) Should there be a common ceiling across all genres for the FTA channels or different ceilings for different genres? What should be the ceilings in each case and the reasons thereof?

NO

Interconnection in the Digital Addressable Cable TV Systems

Q6. Does any of the existing clauses of the Interconnection Regulations require modifications? If so, please mention the same with appropriate reasoning?

Existing clauses are sufficient

Q7. Should the subscription revenue share between the MSO and LCO be determined by TRAI or should it be left to the negotiations between the two?

By TRAI otherwise small players will not survive

Q8. If it is to be prescribed by TRAI what should be the revenue share? Should it be same for BST and rest of the offerings?

For BST: MSO 20% - LCO 80% and for rest of offerings Broadcaster 50% MSO 25% LCO 25%

Q9. Should the 'must carry' provision be mandated for the MSOs, operating in the DAS Areas?

Yes, to prevent monopoly must carry / provide mandate should be under regulation.

Q10. In case the 'must carry' is mandated, what qualifying conditions should be attached when a broadcaster seeks access to the MSO network under the provision of 'must carry'?

Carriage Fee

Q11. In case the 'must carry' is mandated, what should be the manner in which an MSO should offer access of its network, for the carriage of TV channel, on non-discriminatory terms to the broadcasters?

Carriage cost to carry the channel with a reasonable term.

Q15. Should TRAI prescribe a standard interconnection agreement between service providers on similar lines as that for notified CAS areas with conditions as applicable for DAS areas? If yes, why? Yes, some player may not fulfill pre requisite condition and use bargaining power to dictate the terms.

Quality of Service Standards for the Digital Addressable Cable TV System

Q16. Do you agree with the norms proposed for the Quality of Service and redressal of consumer grievances for the digital addressable cable TV systems? In case of disagreement, please give your proposed norms along with detailed justifications.

Yes

Q17. Please specify any other norms/parameters you may like to add with the requisite justifications and proposed benchmarks.

A standard set parameter will help everyone.

Q18. Who should (MSO/LCO) be responsible for ensuring the standards of quality of service provided to the consumers with respect to connection, disconnection, transfer, shifting, handling of complaints relating to no signal, set top box, billing etc. and redressal of consumer grievances?

MSO should be responsible for providing QOS to LCO & LCO should be held responsible for providing QOS to consumers.

Q19. Whether Billing to the subscribers should be done by LCO or should it be done by MSO? In either case, please elaborate how system would work.

Billing should be done by LCO for final distribution. MSO should bill LCO at whole sale rate.

Q20. Should pre-paid billing option be introduced in Digital Addressable Cable TV systems?

Yes, as an option.

Miscellaneous Issues

Broadcasting of Advertisement free (ad-free) channels

Q21. Whether an ad-free channel is viable in the context of Indian television market?

As it will be premium service, let it be market driven.

Q22. Should there be a separate prescription in respect of tariff for ad-free channels at both the wholesale and retail level?

Q23. What should be the provisions in the interconnection regulations in respect of adfree channels?

Q24. What should be the revenue sharing arrangement between the broadcasters and distributors in respect of ad-free channels?

Broadcaster: 60 LCO 20 MSO 20

Non addressable digital Set top boxes

Q25. In case you have any view or comment on the non-addressable STBs, you may please provide the same with details.

Non-addressable STBs should not be allowed, as would cause hindrance to DAS implementation

Reference point for wholesale price post DAS implementation

Q26. Would there be an impact on the wholesale channel rates after the sunset date i.e. 31st Dec 2014, when the non-addressable systems would cease to exist? If so, what would be the impact?

Quality channels will get their share of revenue and irrelevant channels will go FTA and have to depend on ad revenue.