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From: hupadhyay@consumer-voice.org

Date: Monday, January 16, 2012 4:15 pm

Subject: Comments on Issues Related to Implementation Of Digital Addressable Cable TV Systems

> Dear Mr. Shri Wasi Ahmad,

> Advisor (B&CS),

> TRAI

>

> From VOICE our comments / suggestions issue wise are-

> Issue #1- Benefit of digitization should be available to

> consumers as well

> so FTA channels should be increased from 30 to 45 on an all

> India basis.

> Issue #2- The composition should be decided based on local demand,

> locality (or mohallas) may be a unit for such decisions. We can

> make some

> Door Darshan channels compulsory on an all India basis.

> Issue #3- Price for FTA should be same on an all India basis.

> But should

> be kept at a minimum as we are forcing consumers to migrate to a new

> system wherein they are any way being burdened for paying for

> STB. Hence

> it should be less than Rs. 50/-.

> Issue #4- Ensure that a bouquet of 100 channels including FTA

> should be

> available for less than Rs. 150/- the average amount currently

> charged by

- > cable operators.
- > Issue #5- TRAI should prescribe maximum limits. Pricing
- > flexibility should
- > be given to service providers in inverse proportion of a channels
- > popularity i.e. more popular channels should have more TRAI
- > control and
- > less pricing flexibility to the service providers.
- > Issue #6 to 8-No Comment.
- > Issue #9- Yes.
- > Issue #10 to 15- No Comment.
- > Issue #16-17
- > a. Application for porting to another service provider should
- > also be there.
- > b. Whether the customer opts for STB on rent or on outright purchase,
- > maintenance will be the responsibility of the service provider.
- > c. Security deposit if envisaged should be adjusted over a reasonable
- > period of time say 12 months of continuous connection.
- >
- > Issue #18-LCO should be responsible because it is better to have
- > a face
- > for consumers.
- > Issue #19-LCO should continue to do the billing. For the purpose of
- > billing as well as QOS LCO can be treated as fully connected
- > Customer Care
- > face. Current system of relationship between LCO and MSO can be taken
- > forward with the addition of a real time interconnection.
- > Issue #20- No prepaid system please as it is not consumer

- > friendly at all.
- > We should learn from Mobile system and avoid this trap altogether.
- > Issue #21 to 24- No Comments except it should definitely be explored.
- > Issue #25- From consumers' perspective more alternatives always
- > help the
- > consumers and maintain market competition. Hence non-addressable
- > digitalSet Top Boxes (NA-STB) should also be an alternative
- > offered to consumers
- > and we as Consumer body insist that NA-STB should also be
- > available to
- > consumers as an alternative. As for BIS, BIS can be asked to provide
- > standard for NA-STB as well.
- > Issue #26- After sunset date we suspect that there will be a creeping
- > increase in rates on various pretexts as the consumer will be
- > tied to the
- > STB provider. Unless we can ensure the level of competition
- > which exists
- > today among LCOs we will not be protecting the consumer.
- > Issue #27- Two main issues which are a must for ensuring
- > competition among
- > service providers have not been addressed at all.
- > a. Portability of Set Top Boxes (STB) – This is the only way service
- > providers can be kept on their toes. We should learn the lesson from
- > Mobile services which has made India as the lowest cost market
- > as far as
- > Mobile services go.
- > b. Ensure that there are at least 3 cable service providers in

> all the areas.

> c. NA-STB should also be an option.

> d. A community set up also should be explored like providing a single

> connection to a housing society to be managed by the society.