



## Comments on TRAI Consultation Paper

on

*Draft (Second Amendment)*

*to*

*The Telecommunication (Broadcasting and Cable) Services Standards of  
Quality of Service and Consumer Protection (Addressable Systems)  
Regulations 2017*

August 22, 2019

**Zoom2Growth**

Marketing | Media | Research | Tech

*TRAI has sought comments from stakeholders on the issue of developing of App by third parties and consequent sharing of information using API between DPOs and third party developers enabling consumers to have ease in selection of channels of their choice and reduce TV viewing charges by optimizing their subscription while allowing them to view TV channels of their interest.*

## Overarching Opinion

Zoom2Growth congratulates TRAI on a great initiative to regulate Broadcast & Cable industry and make it a consumer oriented, consumer friendly industry. Such initiatives are welcome, long needed and will set an example of Bharat for the rest of the world to follow. The following comments are a commentary to contribute towards TRAI's honest objective enhancing consumer convenience.

## Comments

TRAI is uniquely and ideally poised to drive this process. We recommend the following additions to bolster TRAI's draft amendment:

### **1. Consumer Convenience Measure:**

This amendment is built on the assumption (not entirely untrue) that a Third-Party mobile application design will make it easy for consumer to select channels. Not necessarily. Based on experience of Zoom2Growth's in-house experts (refer Annexure) we assure TRAI that user interface and functionality of any application is in perpetual Beta mode i.e. continuously evolving. Hence, the only way to select the right application and to ensure its impact does not change over time is a consumer measure. This should be done by TRAI as a periodic (yearly), 20-30 random city survey over a statistically significant sample size. Such a survey will re-assure that these application(s) serves the purpose and also their impact in consumer friendliness does not deteriorate over time.

### **2. Only TRAI accredited TPDs (Third Party Developer) to be allowed**

Broadcast is a licensed industry. DPO is a licensed industry. It is for a reason. Hence, any Third-Party Developer cannot be "anyone" as suggested in the draft. It has to be an

approved vendor, responsible for data and culpable in case the vendor changes access functionality without the approval of TRAI or an appropriate authority. We would like to point that best of technology firms including Aadhar service provider, facebook, NASA, Verizon, blockchain based bitcoin etc. (list is very long) have had data breaches. Even if a TPD assures that secure technologies will be used, the fact remains that they have the access to alter their codes at a later date (perpetual beta). Hence the need for TPD license and also culpable clause in case of a mischief.

### **3. Allow DPOs app to be used if it beats TPDs in consumer convenience**

DPOs are neither rookies, not crooks trying to cheat consumers. They are a permanent part of consumer community and masters in the art of last mile service providing. They can build and/or learn to build their own application which, at some time will beat, these TPD applications in consumer convenience. This should be permitted if they can, through consumer survey or panel process, conclusively prove superiority of their app over this TPD application to TRAI. At the very least they should have the first right to outright purchase the TPD app if they have the willingness to pay.

### **4. Cover the gaps currently left in DPOs not covered in bill till now**

It is imperative that regulations keep up with technology. Currently there is a gap in way DPOs are defined and treated. Redistribution of content of all audio-video content should be treated equally. It is currently divisive. We recommend that TRAI should have the same las applicable to all broadcast redistributors aka DPOs including but not limited to MSOs, LCOs, DTH, Telecom VAS, OTTs and any other technology.

*This is a great initiative by TRAI and all necessary decisions should be taken to make it a non-discriminatory, consumer friendly, error-free and successful. Zoom2Growth comprises media domain experts who combine their expertise with global research projects to provide unmatched consultancy. We are happy to contribute, now and in future towards making Bharat a leader in this space.*

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## ANNEXURE: Z2G Consultant Profile



### Neeraj Sanan

Action Consultant | Marketing-Tech-Strategy Expert

*Brings deep understanding of accelerating and launching Consumer and Broadcasting businesses in India*

#### ABOUT NEERAJ:

Neeraj Sanan, a leading consultant in marketing practice works closely with clients to help provide them go-to-market strategies that build brands for long term, sustained accelerated growth

Drawing on a deep understanding of category economics, Neeraj has worked across consumer companies in India to bolster their revenues. An astute marketer, he has a rich experience of two decades in launching brands from ground, brand migration, analytics, market research and trade marketing and consumer promotions. He has set up high performing business and teams for several global consumer enterprises.

#### EDUCATION:

Manchester Business School	PhD 2019
Harvard Business School	AMP 2010
Indian Institute of Management Bangalore	MBA 1995
Punjab Engineering College Chandigarh	B.E(Hons)

#### PUBLISHED WORK:

<https://www.forbes.com/sites/forbescommunicationscouncil/2017/08/02/four-questions-executives-should-ask-themselves-to-build-a-strong-social-brand>

<https://www.forbes.com/sites/forbescommunicationscouncil/2017/03/28/simplifying-the-fourth-industrial-revolution-data-science-ioe-ai/#1b080280275e>

<https://www.peoplesmatters.in/article/talent-management/why-do-high-performers-in-one-company-fail-in-another-14683>

#### DOMAIN EXPERTISE:

- Business Strategy
- Brand Launch
- Integrated offline-online advertising
- Content Marketing
- ROI based Media planning
- Analytics & Research
- Marketing Training
- MIS Dashboarding
- Marketing Technology

#### INDUSTRY EXPERIENCE:

- Cloud based SaaS
- Digital Media
- FMCG
- Data Analytics

#### PROJECTS DELIVERED:

- Brand Architecture for largest Indian media conglomerate
- Brand Migration at a leading Consumer brand
- Asia Pacific launch for an AI company
- Setup & launch at a Multi-Platform Broadcaster