## Cable Operators Federation of India

13/97, Subhash Nagar, New Delhi-110027, Ph. 011-25139967, 9810269272

Ref/COFI/TRAI/8/2013

29 April 2013

The Chairman
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi-110 002

## <u>Sub: Counter Comments on Consultation Paper on Issues</u> relating to Media Ownership

Sir,

Please refer to various comments on Consultation Paper on Media Ownership dated 15 February 2013.

Our counter comments on some of the responses are given below.

1. There must be restriction on cross media holdings even in news and current affair channels. Many stake holders have given their view that there should not be any restriction on cross media holdings. However, we oppose it whole heartedly. We have seen this over the last 20 years when the first channel started its broadcast.

Imagine a scenario where one large media group owns 20 or more news channels in different languages of the country. If it has its own DTH, MSO networks in big cities, news papers in different languages and on-line news portals, it has all the power to influence the minds of majority of the population. Every Political outfit will try to woo this Group or in other way, this group can influence the government in power to frame policies to favour its business against its rivals. Infact this is one of the

reason that the Ministry sent its reference to TRAI to examine the present issue.

After the recent Saradha Group scandal even the Government is worried and asked for details of share holding and equities of all the channels. In fact, to go a step forward, we suggest that government should also find the whereabouts of promoters and major shareholders of the foreign investment companies who invest in any media company. We are sure to find many dubious companies being used to funnel back the black money stashed in foreign investment companies abroad.

- 2. Misconception-Indian Market is Hyper Competitive with 800 channels. There is practically no competition in the Indian Market. Out of the 800 channels 180 pay channels are controlled by just three media groups and rest are as good as not existing ( Please see the Annexure-I attached). It is almost impossible to survive in the national market unless one joins one of the groups because they own DTH, MSO networks, content aggregators and online media and have the power to blackmail any one as they wish. For their sports channels these broadcasters have decided to distribute separately so that they can fetch maximum price from consumers. They have the IBF and NBA to lobby for them apart from other Industry Associations. There is practically no room for smaller players in the country, be it in the TV Channel space or in distribution space. FTA broadcasters have not joined these groups.
- 3. Existing framework of Competition Commission of India is adequate. All these commissions and Courts are made for the big powerful people who have a coterie of very senior lawyers to guide them and influence the minds of the policy makers. Even in the courts a junior lawyer representing a small player does not have the courage to stand opposite these powerful people. Even Competition Commission proceedings are influenced by the verbal jugglery of these lawyers and the petitioners are forced to withdraw or go in

hiding. In any case a small player operating in a remote corner of the country has no hope of getting justice from a court in Delhi. So, either they give up or compromise to save their livelihood. To validate this, we request you to go through hundreds of cases in TDSAT and Competition Commission.

One recent case is of Media Pro where CCI gave them a clean chit in spite of the facts that the whole industry is familiar with their coercive methods with small players. The biggest hurdle in independent MSOs getting a DAS license was because Media Pro did not give them its content and Ministry, due to some reason had this mandatory condition of signing with the pay TV providers before they gave the license. Even Ministry did not think of the smaller players who have been earning their livelihood from cable networking and could still co-exist with only FTA channels for the poor people. There will be millions who would prefer not to watch a Pay channel if they have to dish out Rs 20 extra for that channel but the government does not have any concern with that.

So, CCI is meant only for corporate to fight with each other for supremacy and not to protect the rights of smaller entrepreneurs. Its definition of level playing field, relevant market etc do not suit our media industry where the whole industry is disorganized and difference in competing platforms and stake holders is substantive. One works all India and the other works in a small locality. It finds predatory pricing by a DTH player as no competition to a small independent MSO in a city because it thinks they function in different relevant markets without realizing that to consumer they serve the same product. CCI does not even consider FTA channels and Pay Channels as separate markets.

## We badly need an autonomous Broadcast Regulatory Authority

## 4. Counter on Comments made by Star India Ltd.

a) Star India says 20% direct shareholding restriction in DTH guidelines is devoid of reason. (Para 2, Page 2) DTH is a distribution platform which STAR has always been attracted to because it could give it a means to reach the consumers directly and create its own market. This is also a fact that their first two attempts in this direction were illegal and forced to close down. In spite of calling itself a media company, supposed to be a fourth pillar to the nation, it has shown least respect for national interest. It is to avoid such ventures that we need strict regulations on media ownership.

# b) It Advocates the 'Fit and Proper Test' and supports 'conduct' based regulations as opposed to investment related restrictions. (Sub Para c, Page 3)

It should not forget what happened to the father and son duo of Rupert Murdoch, chairperson of Star India's parent company M/S News Corp and his son James Murdoch in the British Parliament where they were accused of unethical phone hackings and influencing high government officials and politicians. In fact Rupert Murdoch had to undergo 'Fit and Proper Test' and was found unfit. We quote New York Times of 01 May 2012 on the subject:

"A damning report on the hacking scandal at Rupert Murdoch's British newspapers concluding that Mr. Murdoch is "not a fit person" to run a huge international company has convulsed Britain's political and media worlds and threatened a core asset of Mr. Murdoch's American-based News Corporation."

(**Note**: Just search on Google with tag words: 'Rupert Murdoch Scandals', 'james Murdoch', 'News Corp', 'telephone hacking', 'Rebecca Brook' to find track record of News Corp and its owners.)

People who represent Rupert Murdoch's companies in India are only employees or working under contracts. They speak this language only because they do not have their own money involved. Cable Operators have toiled hard for 25 years investing their own money to come up to this stage and created this small scale service and business enterprises (see **Annexure III** attached) now find their whole livelihood in danger because of these monopolies.

Unfortunately unfettered liberty to invest for expansion makes people greedy to the extent that they stoop down to any level. We should not forget that the first DTH operator registered in India by News Corp in 1997 was created using such unlawful means and it was asked to shut down by the government.

Things have not changed in all these years. A few media companies came with just one channel and now control 70% of the Indian market using all possible means of misusing media power using unethical means.

c) They say that **TRAI** did not analyse the regulatory framework in other countries (Para 3, Page 4) taking into account forbearance, freedom to contract etc. They have forgotten that those markets have developed through strict regulatory regime in the last thirty years to come up to this stage. We are only beginning to get regulated. Cable TV Act of 1994 was regulating only the Cable Operators who were declared as Small Scale Service & Business Enterprise by Government of India, Ministry of Industries (letter attached as Annexure III). Till date there is no law for DTH and Broadcasters- only guidelines exist. Any attempt by any government has failed because of their money and media power.

In the US when industry was being regulated, small cable operators were given all the protection to run their business.

All Big Players faced strict tariff regulations where as small ones were left free. **We quote from the FCC website:** 

"In passing the 1992 Cable Act, Congress found rates for cable services rose significantly following the 1984 Cable Act. Congress directed the Commission to establish rules to govern rate regulation of cable service tiers offered by cable systems that are not subject to effective competition. These rules were intended to improve service to the cable subscriber and to ensure competitive rates."

"Each service tier was subject to regulation under the 1992 Cable Act in a slightly different manner. Local franchising authorities are responsible for regulating the basic service tier and, until March 31, 1999 (as provided by the 1996 Act), the Commission was responsible for regulating cable programming services tiers. Both followed rules set by the Commission, which established a "benchmark" rate based on a number of factors, including the number of subscribers, channels, and a number of other factors. Pay-per-channel and pay-per-program services are not regulated."

"In addition, under the 1996 Act, small cable operators are partially or wholly exempt from rate regulation. A "small cable operator" is defined to include any operator that serves fewer than 1 percent of all subscribers in the United States and that is not affiliated with entities that have gross annual revenues exceeding \$250 million. In any franchise area where a small cable operator serves fewer than 50,000 subscribers, rate regulation does not apply to the operator's basic tier if it was the only tier subject to regulation as of December 31, 1994."

Also, if Star India has studied the international markets so well they would also know that **even USA and UK took** 

more than 10 years to migrate to digital and still it is not completed. Broadcasters are requesting more time there. (see chart showing time taken by other countries to go digital attached as **Annexure-II**).

With so much of knowledge and international experience, we are surprised why Star India did not suggest the Ministry not to create such a hurry in implementing Digitisation so that consumers adopt the technology smoothly? And we wish to know why in no consultation it ever suggested from News Corp's international experience that no country in the world ever mandated a technology on cable TV? It is the consumer need that decides such things. Answer is very simple, it gave a chance to rule over the TAM city market and increase its monopoly.

It is their group DTH operator that gave the first ad against the government campaign of going digital condemning the cable STB as 'Dibba'. That is the effect of monopolies and uncontrolled media ownerships.

- d) Star India has condemned the ASCI Report (Page 7) on Cross Media Ownership and Monopolies in Media. ASCI report was presented and discussed in an ASSOCHAM Special Meeting where lawyer lobby of one of the leading foreign broadcaster became very agitated and tried to impress upon the ASSOCHAM officials not to have any discussion on the subject. Ironically this company was also the sponsor for the event like they sponsor most of the other industry events regularly, particularly those organized by industry organizations like FICCI, ASSOCHAM & CII and foreign organizations like CASBAA and MPA. No other stake holder has condemned this report like Star has done.
- e) Star India's criticism of ASCI report and condemning it outright is not in the right spirit (Page 7). The report that was prepared on the request of the I&B Ministry took almost one year to its completion after a thorough grass root level research.

It appears that Star India did not like ASCI getting the ground report from the Cable Operators who own the last mile and are the biggest stake holder in the industry. But for Cable Operators, Star India would not have set their foot in India. Broadcasters like Star are always used to have their own way by sponsoring all major industry events, industry researches and the media to create an opinion of their own and impress regulators and bureaucrats with their money and media power. This further helps them to frame favourable regulations so that they strengthen their monopolies in the Industry. This is just their modus operandi to use media and money power to stffle any voice against them, particularly where their business interests are being harmed.

f) It is wrong on Star's part to state that a Cable Operator combine has the penchant to obfuscate the digitalisation mandate and carry a personal vendetta/grudge against selected broadcasters in all available fora. We do not know which combine they are talking about but COFI as a Cable Operator organisation has always tried to put across the ground realities in every fora which sometimes may go against the unethical methods of some stake holders. We believe that unless the regulator and the government takes in to account the ground realities before framing any regulations, their purpose will never be achieved.

Cable Operators always wanted transparency in their business because they have been advocating addressability right after the first FTA channel was made 'Pay' by Star TV in 1994. Even Star knew that all over the world 'PAY' channels are distributed using addressable STBs (then analogue) but still decided to force their pay channels on cable operators starting a negative trend taking the industry to its present state where ARPUs are still low and last mile infrastructure has not evolved to deliver pay channels. However,

broadcasters kept asking operators more payments and **blamed them for under-declaration**.

- g) It was with the efforts of COFI that CAS was introduced by the government in 2003 to bring transparency but was derailed by the 'Pay' Broadcasters because consumers would have had the choice to select content making many broadcasters to lose TRPs and thus revenue. If CAS had continued, India would have been completely digital by now but many pay channels would have either become FTA or wound up their business.
- h) There is no reason for any Cable Operators combine to have any personal vendetta against any broadcaster or other stake holder. All industry organisations try to protect the rights of their member stake holders, be it IBF, NBA, DTH Operator Association or COFI. There are no personal interests involved in any association work.

Some people get into the associations only for personal business gains for creating a lobby. These stake holders get the feeling that they are above law and indulge in all kinds of unethical and illegal ways to achieve their aim even if they have to harm someone personally or destroy someone's business and even go to the extent of hurting business of their family members. History is replete with such examples where false FIRs, criminal attacks and prolonged court cases have been resorted to against small players by some powerful stake holders.

i) It is such kind of powerful stake holders who resort to vertical and horizontal monopolies edging out smaller players so that consumers are left with no alternative for the services and are forced to pay what price they are asked.

- j) Present digitalisation process in fact, is going in this direction where a technology is being forced on consumers against their choice. Even after six months of completing the seeding process spending millions, there is no positive outcome and already consumers have started protesting against poor quality of STBs, no repairs and warranties, no BIS compliance, no BEE rating, no portability and no repairs. Increased bills and taxes are forcing them to disconnect their cable harming the business of last mile operators. We have opposed this methodology rather than technology.
- k) Star has quoted I&B Secy's statement before the Standing committee on IT to support their view that there is no monopoly in DTH domain (Page 9). However, Star India also knows that everything is not so nice in DTH domain and all that the Secy stated was also not correct. All the six players (not seven- DD FTA DTH is never counted in commercial DTH platforms) do not have the same market share and operators who are also Pay Broadcasters dominate the market. One of the non broadcaster DTH operator, Bharti Airtel has also suggested in its response that no broadcaster should have more than 20% equity in any distribution company including DTH.
- Indian consumers pay the lowest retail rates while consuming a plethora of media products. (Page 10) This is also a misconception if Star is referring to 'Pay' channels as these media products. People who have drafted these comments have no knowledge of the Indian market and compare our market with other developed countries. We had objected to TRAI 's statement in 2010 too.

No Pay Channel market in India—The fact is that India is a poor country and consumers can not afford costly entertainment (see chart showing poverty status of Indian states as Annexure IV). All star channels came to India as FTA channels. When they made their channels 'Pay' in

1994, they knew there was no addressability in India required to distribute pay channels. We had approached the Ministry at that time to allow pay channels only after introducing addressability but Ministry also ignored our request. The result was that cable operators were forced to pay STAR a monthly rental to distribute these channels from their pocket. This amount was increased arbitrarily every now and then where as consumers never paid for this content. Consumers are still the same and this will become more evident when consumers receive the DAS package bills now after two phases of digitization are over. This is the reason that ARPUs have not gone up from Rs 150.

**No Under-declaration** This concept was also introduced by big foreign broadcasters. Since there was no addressability, payments for pay channels were taken from cable operators on negotiated numbers. This negotiation depended on broadcasters' distribution executives who kept their own cuts and then gave rest of the cash to the company. So the concept of under-declaration was started. All other pay channels also followed this trend there after.

- m) Much against STAR's views, restrictions on monopolies and cross media holdings are very essential for any democratic setup. Need of the present exercise arose only after the Minister saw the ground situation worsening in every state due to monopolies supported by corporate or political parties.
- n) We are surprised to read in Star India's response that struggling media businesses already reeling amidst severe economic difficulties ( Page 11) when the same business has made them grow from one channel to India's biggest media group having majority shares in broadcasting, DTH, MSO, content aggregation etc. All this was done only after flouting all rules and regulations and monopolistic activities News Corp is famous for.

- o) Most of the wrong practices in the sector like minimum guarantees, creating monopolies using Distributor MSOs (Supreme Court case Sea TV Vs Star India), denying content to other operators violating the non-discriminatory rule, taking every dispute to the courts to delay the matters etc. have been indulged by Star India. The company has all the means and clout to circumvent rules and manipulate corporate structure to avoid difficult situations but it cannot be denied that from its very entry till date it has always been in controversies directly or indirectly. (There are hundreds of cases in TDSAT concerning this)
- p) According to Star India, Economic benefits of vertical integration are far more substantial. Not in the present case. We have practically seen that due to unabated vertical monopolies in Media by some broadcasting companies, cable TV sector has not progressed at all. Cable TV infrastructure of 100 million homes that could have served the nation as a broadband infrastructure has remained a one way outdated network. In a country like India where 70% population is poor we need to uplift the smaller entrepreneurs encouraging them to grow, protect them from unfair competition from the large corporate and give them ample opportunities to grow.
- 5. FICCI and such like organizations are only Lobbies for the Rich Media Companies. The comments received from FICCI are nothing but the voice of its sponsors who man its entertainment committee. Has FICCI as a national level industry organization ever taken up the cause of small cable operators who own the last mile of 100 million Homes and are recognized as Small Scale Service & Business Enterprise? In its Entertainment committee there is no representation of Cable Operators.
- **6.** <u>Media Cartels can block information of Public interest.</u> A very glaring example of monopoly and cartelization is that throughout the ongoing efforts of the government to implement

digitization, not even a single news channel ever discussed the problems faced by small cable operators who carry their signals to the masses and collect revenue for them. Not only this, even consumer views were never projected. No ground level information was broadcast by any channel. Only threatening videos were run IBF and NBA members so that common man is forced to pay a heavy subscription to them. On the other hand a small incident effecting broadcasters is blown out of proportion for days together like the cap on ad duration.

- 7. We sincerely feel that the laws and regulations should protect the rights of the smaller stake holders who do not have sufficient knowledge or resources to fight against the poachers. History is a proof that when thousands of unemployed people found their jobs in cable TV networking, within a few years the big and powerful organizations from all across the world pounced upon them to capture a market of millions of people. Some came with their 'Pay' Channels as FTA Broadcasters and other came as MSOs under the pretext of helping the small players. If their intentions were genuine, we would not have the industry so disorganized even after 22 years and the present situation where we are unable to migrate to a new technology in the National interest just because we are unable to find a better way to retain our consumers and work harmoniously with each other.
- 8. So, the fact is that Power, Money and Lobbying rule any business in India. If we do not have strong laws to restrict all kinds of domination and if we do not have an honest implementation of these laws providing level playing field to all, poor will get poorer and rich will get richer. WHERE IS THE DIVERSITY AND PLURALITY OF VIEW POINTS?
- We also strongly suggest that Media companies and their share holding pattern should be brought under the ambit of Right to Information Act.

Note: Above information has been gathered from various sources including Internet and documents available with us. Any clarifications and factual corrections are welcome.

Yours Faithfully,

Roop Sharma

## **Content Distribution Cartels by Large Broadcast Groups in the form of Aggregators**

Aggregator	Broadcasters	No. of Channels	Popular Channels in North India	A-la- Carte Rates	Remarks
Media Pro	<ul> <li>(a) Zee Entertainment Enterprises LTD</li> <li>(b) Zee News LTD</li> <li>(c) Turner International India Pvt. Ltd.</li> <li>(d) Zee Akaash News Pvt Ltd.</li> <li>(e) S.B. Multimedia Pvt. Ltd.</li> <li>(f) Media Content and Communications Services India Pvt. Ltd.</li> <li>(g) Star International Networks Pvt Ltd.</li> <li>(h) Vijay Television Pvt. Ltd.</li> <li>(i) Star Entertainment Media Pvt. Ltd.</li> <li>(j) Star India Pvt. Ltd.</li> <li>(k) New Delhi Television Ltd.</li> <li>(l) NDTV Lifestyle Ltd.</li> <li>(m) Fox Channels India Pvt. Ltd.</li> <li>(o) MGM Programming Services India Pvt. Ltd.</li> </ul>	78	Star Plus Zee TV Zee Cinema Cartoon Network HBO POGO Star Movies Life OK Nat Geo NDTV 24X7 Star World NGC	Rs. 20 Rs. 15 Rs. 15 Rs. 14 Rs. 18 Rs. 14 Rs. 19 Rs. 23 Rs. 7 Rs. 10 Rs. 6 Rs. 7	
IndiaCast	<ul> <li>(a) Viacom 18 Media Pvt. Ltd.</li> <li>(b) IBN 18 Broadcast Ltd.</li> <li>(c) The Walt Disney Company India Pvt. Ltd</li> <li>(d) Television Eighteen India Ltd.</li> <li>(e) AETN 18 Media Pvt. Ltd.</li> <li>(f) United Home Entertainment Pvt. Ltd.</li> <li>(g) Sun TV Network Ltd.</li> <li>(h) Ushodaya Enterprises Pvt.</li> </ul>	52	Disney IBN 7 Colors MTV CNBC TV 18 CNN-IBN CNBC Awaaz	Rs. 4 Rs. 3 Rs. 23 Rs. 3 Rs. 4 Rs. 3 Rs. 2	
MSM Discovery	<ul> <li>(a) Multi Screen Media Pvt. Ltd.</li> <li>(b) Bangla Entertainment Pvt. Ltd.</li> <li>(c) Discovery Communication India Pvt. Ltd.</li> <li>(d) TV Today Network Ltd.</li> <li>(e) Neo Sports Broadcast Pvt. Ltd.</li> <li>(f) Times Global Broadcasting Company Ltd.</li> <li>(g) Zoom Entertainment Network Ltd.</li> </ul>	28	Sony Set Max Discovery AXN SAB TV Set Pix Aaj Tak Headlines Today Neo Sports	Rs. 23 Rs. 20 Rs. 17 Rs. 17 Rs. 16 Rs. 14 Rs. 8 Rs. 4 Rs. 28	

Terrestrial

#### DIGITAL SWITCHOVER IN THE WORLD S.No. Country **Started Proposed Present State** Remarks Switch-off 1. USA 2000 2009 Six more months Terrestrial only given for switch-off \$40 Subsidy to on 12 June 2012 poor 73 Million 2. UK 2005 Oct 2012 Not yet For terrestrial completed only \$ 40 subsidy to low Income house holds 3. 2010 Switched Germany 2002 DTH only, Cable TV Still analog Over on 30 Apr 2012 No date fixed for Analog switch off Finland Available in 2001 31 Aug. 2007 Terrestrial 4. 5. France 2005 31 Aug. 2007 Completed in Nov 2011 Terrestrial 6. Available 2011 Terrestrial Spain Since 2000 Available Terrestrial 7. Sweden 2008 Since 1999 2001 2013 Terrestrial 8. Australia Canada **Terrestrial** 9. 2003 2012

2011

Switched-off

In 2012

10.

Japan

2003

#### **GOVERNMENT RECOGNISE CABLE TV OPERATION AS SSSBE**

Dated 1st Feb 1994

NO. 2(3)/93-SSB bD. & Policy
Govenment Of India Ministry Of Industry
Dptt. Of Small Scale Industries & A.R.I
Office of the Development Commissioner (SSI)

То

- 1 The Secretary (Industries) All States/UTs
- 2 The Director/Commissioner of Industries (All States/UTS).

Subject - Activities Registrable as SSBE-s Inclusion of Cable T.V Service as 'SSSBE'

Ref Letter No. 2(3)/91-SSI Bd. dated 30.9.91

Letter No. 2(3)/91-SSI Bd. dated 3.1.92

Sir

In Continuation of this office letters of even number referred to above. I am to inform you that it has now been decide to recognize the following activity as a Small Scale Service & Business Enterprises (SSSBE).

(a) "Installation and operation of Cable T.V. Network"

These units would be eligible to obtain registration with the registering authorities as 'SSSBE' and will be entitled to avail the benefits available to SSI units. Subject to other terms & conditions.

Yours Sincerely

Sd/-

(RAJUSHARMA)

DIRECTOR (SSIBD. &POLICY)

### Copy forwarded to

- 1 Director of all SISIs & Director in HQ& IAs.
- 2 All others as per mailing list.
- 3 Director. Tech.Pub. O/o the DC(SSI). New Delhi.

# **Poverty Mapping Chart**

Socio Economic Survey Sixty Third Round (July 2006 – June 2007) (Report of NSS) Submitted to Planning Commission, New Delhi, May 4, 2011

S. No.	State	Total Sample (People)	Poor Class	Middle Class Class	Upper Class Class	Per Capita Income
1.	Jammu & Kashmir	1118	918	183	17	
2.	Himachal Pradesh	1196	1160	34	2	
3.	Punjab	1584	1543	37	4	
4.	Chandigarh	182	123	40	19	
5.	Uttaranchal	616	594	20	2	2164
6.	Haryana	1321	1143	157	21	3611
7.	Delhi	1616	1203	346	67	4170
8.	Rajasthan	2956	2873	40	43	3518
9.	Uttar Pradesh	5195	4801	314	80	3186
10.	Bihar	2422	2185	227	10	
11.	Sikkim	256	218	35	3	4860
12.	Arunachal Pradesh	571	557	12	2	
13.	Nagaland	452	314	119	19	
14.	Manipur	823	818	4	1	3312
15.	Mizoram	604	483	111	10	6302
16.	Tripura	1060	984	69	7	2628
17.	Meghalaya	624	425	156	43	
18.	Assam	2089	1894	192	3	
19.	West Bengal	5651	5480	136	35	3402
20.	Jharkhand	1216	1107	108	1	2197
21.	Orissa	2628	2502	90	36	2464
22.	Chhattisgarh	1282	1085	181	16	3403
23.	Madhya Pradesh	2678	2515	162	1	2718
24.	Gujarat	2570	2500	68	2	5640
25.	Daman & Diu	220	198	14	8	4126
26.	Dadar & Nagar	131	109	17	5	4877
27.	Maharashtra	5040	4692	319	29	4944
28.	Andhra Pradesh	5635	5402	230	3	
29.	Karnataka	3013	2840	170	3	3031
30.	Goa	190	151	36	3	4244
31.	Lakshadweep	64	53	10	1	3074
32.	Kerala	3132	2977	125	30	6514
33.	Tamil Nadu	5226	4995	176	55	4131
34.	Pondicherry	216	205	7	4	4807
35.	Andaman and Nicobar	251	202	39	10	4899
	Total	63828	59249	3984	595	98222
	Percentage	122000000000000000000000000000000000000	92.82%	6.24%	0.94%	