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**Sent:** Wednesday, August 23, 2023 7:42:00 PM

**Subject:** Comments on consultation paper on Broadcasting tariffs

Respected Sir,

Thanks for giving us the opportunity to share our views on consultation paper on Broadcasting tariffs. I would like to use this opportunity to express my views for few of the questions posted in the paper.

**Should the present ceiling of Rs.130/- on NCF be reviewed and revised?**

My view is that NCF of Rs. 130 is very high, it should be reduced, considering number of streams from where these DTH/MSO and broadcasters earn revenue. I understand broadcasters and MSO had requested that there should not be any cap and the NCF should increase every year considering inflation. Their greed will never end. They will tell they are in losses due to low NCF but that is not the case. Reason for their losses is people are migrating to OTT and poor people and lower middle class to DD Free Dish as they can't afford paying increase in monthly bills since this NTO 1 came in 2017. I remember I use to pay 695 to Tata Play for two TV and use to get all hindi GEC, Music, Movies, Sports, Knowledge, lifestyle and News channels. Only english news, movies and english GEC i won't get before NTO. When i was using cable tv i use to get all the channels available in India in around Rs. 400 for two TV. All family members have different taste so we had to keep two televisions.

**Should TRAI revise the current provision that NCF for 2nd TV connection and on wards in multi-TV homes should not be more than 40% of declared NCF per additional TV?**

2nd TV NCF fee is reasonable and should not be increased considering we are paying separately for each channel and the provider is not installing any additional infrastructure other than additional cable for second TV. DTH or MSO operators get NCF per television + around 10% margin on each channel subscribed by us. They charge channels to give them channel numbers as per their wish. They broadcasters to include their channels in curated bouquets or add ons DTH/MSO have created. Additionally, they take carriage fee from FTA channels to host them on their platform. They also get ad revenue from ads beaming on EPG. They earn from services channels which are very expensive and are more than Rs. 60 per channel. They earn from advertisement on home channel. Therefore, either NCF on first TV should be decreased, keeping second tv NCF same as now or else there should be Rs. 130 NCF irrespective of number of televisions you have.

**Should there be a provision to mandatory provide the Free to Air News / Non-News / Newly Launched channels available on the platform of a DPO to all the subscribers?**

Unless there is a bandwidth crunch for any operator and to accommodate new channels it has to compress the channels which could lead to decline in quality of video and audio of channels they should not be forced to make all the channels available. At the same time DTH operators and MSO should accommodate taste of all the people. They should not just keep on adding news channels because they are free to air and are paying carriage fee and not include channels which could be paid but interesting. Tata Play has not added channels like Investigation Discovery HD, &Xplor HD, Abzy movie channels, Goldmine movie channels even after years of their launch but keeps on adding 4-5 Free to air news channels. All news channels show same news at the same time and will continue to telecast one or two news stories throughout 1-2 days. Everyone will watch quality channels like NDTV, ABP, Republic, Navbharat, Aaj Tak and few more FTA news channels but these news channels don't stop. Although at the same time we need some international english news channels so that we get to know what's happening in rest of the world and they broadcast quality content as well apart from news like documentaries.

**In case of amendment to the RIO by the broadcaster, the extant provision provides an option to DPO to continue with the unamended RIO agreement. Should this option continue to be available for the DPO?**

My view over here is that there should a provision that DPO should have to amend their RIO agreement as soon as there are changes from broadcaster. I remember one instance where Disney had reduced price of their English channels bouquet pack from Rs. 49 to Rs. 25 per month but Tata play continued to charge the old price of Rs. 49 citing that our current RIO tenure has not ended and we will make the changes in the prices once our RIO agreement is renewed which is not honest in my words.

**Should it be mandated that the validity of any RIO issued by a broadcaster or DPO may be for say 1 year and all the Interconnection agreement may end on a common date say 31st December every year. Please justify your response.**

Agreements on common day will ensure uniformity as in the case i told in the previous question, only tata play was charging more not other operators.

**What periodicity should be adopted in the case of pre-paid billing system. Please comment with detailed justification**

It should be calendar month days.

Apart for my views on above questions, broadcasters should be engaged to explore opportunities of reduction of channel prices wherever possible. Star is charging Rs. 22 for both of English movies channels while telecasting limited library of movies, Rs. 22 for all its sports channels even when most of channels and most of the times highlights are being telecasted. Sony also is in same league of charging Rs. 22 each for all its sports channels and Rs. 22 for English movies channels. There is lot of opportunities to tap business in our country which is underutilized as watching television is not affordable even for middle class people, forget poor people. Hope broadcasters and DPO/DTH operators get some wisdom and leave greed and work for objective of providing access to entertainment and knowledge to each home in our country which is only possible if they shed their greediness. Trust me more the homes subscribe to the DPO/DTH more business they will get and their so called metrics will be green again and also increase their revenue as well.

Regards,

Amit Madan