

E-mail: fedservorg@gmail.com

Mobile: 94431 56100

FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

Promoted exclusively to deal with the pressing issues..

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4th Street, Lakshmipuram,
Tiruchirappalli – 620 010. T.N. State .

The Chairman,

Telecom Regulatory Authority of India,

New Delhi – 110 011.

19.01.2018

Kind attention: Shri Kaushal Kishore, Advisor (F&EA -11) TRAI

Sub: Our view on Consultation Paper on Empanelment of Auditors for
Digital Addressable Systems

Dear Sir,

At outset we express our sincere thanks for effort of the TRAI to improve services in Digital Addressable System, we one of the CAG members forward our view in the above consultation paper for your kind consideration and necessary action please:

Q1. Do you agree with the scope of technical audit and subscription audit proposed in the consultation paper? Give your suggestions along with justification?

Ans: Yes, we agree with TRAI view. It rightly think to handover these audit to outsider will create confident about the audit system.

Q2. Is there a need to have separate panel of auditors for conducting technical audit and subscription audit?

Ans: Yes, the conducting technical audit by the qualified technical persons or institution and regarding Subscription audit; the TRAI may consider in appointing its Consumer Advocacy Members, those who are in telecom consumer service and for not profit..

Q3: Should there be a different list of empanelment of auditors based on the model/make of CAS and SMS installed by distributor? Will it be feasible to operate such panel of auditors?

Ans: not required

Q4: What should be various parameters forming eligibility criteria for seeking proposals from independent auditors (independent from service providers) for empanelment? How would it ensure that such auditors have knowledge of different CAS and SMS systems installed in Indian TV sector?

Ans: Their track records about their qualifications and their reliability will help to consider..

Q5: Should the minimum period of experience in conducting the audit be made a deciding parameter in terms of years or minimum number of audits for empanelment of auditor?

Ans: The fixing minimum experience will put away the new talented youngsters, those who are with the genuine sprit to provide service at reasonable charges. Instead fix minimum experience; Form a technical team to decide their ability.

Q6: Any suggestions on type of documents in support of eligibility and experience?

Ans: The technical team may be empowered to decide.. The experience certificate is indirectly depraving the new comers.

Q7: What should be the period of empanelment of auditors?

Ans: One year provisional period will better, considering their performance thereafter allow for three years.

Q8: What methodology to decide fee of the auditor would best suit the broadcasting sector? and Why?

Ans: decide by technical team..

Q9: How the optimum performance of the auditors can be ensured including maximum permissible time to complete audit? Give your suggestions with justification.

Ans: No comments..

Q10: What can be the parameters to benchmark performance of the Auditor? What actions can be taken if the performance of an Auditor is below the benchmark?

Ans: The bench mark submit by the paper would not serve the purpose and it will see through their performance; as we suggested, if the committee satisfied, it could give an opportunity for one year as provisional period and latter decide and fix the benchmark of performance.

Q11: Should there be different time period for completion of audit work for different category of the distributors? If yes what should be the time limits for different category of distributors? If no what should be that time period which is same for all categories of distributors?

Ans: Yes the different time of period for different category.

Q12: Are the conditions cited sufficient for de-empanelling an auditor? If not what should be the conditions for de-empanelling the auditor?

Ans: yes it will sufficient.

Q13: Comments on re-empanelment if any?

Ans: No comments.

Q14: Any suggestion relating to the audit framework.

Ans: Our view to nominate technical audit with the qualified persons or institution regarding subscription audit, the TRAI may consider in nominating its CAGs considering they are serving in the interest of consumers without any expectation.

Thanks and regards.

M. Sekaran.

President.

Member, CAG with TRAI