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Telecom Regulatory Authority of India,
Jawaharlal Nehru Marg,
Mahanagar Doorsanchar Bhawan,
Old Minto Road, New Delhi-110002

Kind Attn: Sh. S.K. Singhal, Advisor (B&CS),

Subject: VIEWS OF NOIDA SOFTWARE TECHNOLOGY PARK LTD (NSTPL), NEW DELHI ON THE CONSULTATION PAPER ON MODEL AND STANDRAD INTERCONNECTION AGREEMENT BETWEEN MULTI SYSTEM OPERATOR AND LOCAL CABLE OPERATOR FOR OFFERING CABLE TV SERVICES THROUGH DIGITAL ADDRESSABLE SYSTEMS (DAS).

NSTPL welcomes and thank the Telecom Regulatory Authority of India for providing an opportunity to the stakeholders' to offer their views/suggestions on the aforesaid Consultation Paper on Draft SIA.

We understand from this consultation paper that LCO and MSO can have different mutually agreed arrangements encompassing the regulatory regime as set by Hon'ble Authority, however this model SIA will be a fall back arrangement when mutual negotiation fails between LCO and MSO.

NSTPL comments on the specific issues of the aforesaid consultation paper are as under:

1. The clause 8.4 proposed in consultation paper states that
"8.4 The MSO shall not distribute pre-activated STBs and the STBs shall be activated only after the details of the Customer Application Form (CAF) have been entered into the subscriber management system."

NSTPL Response: After installing the STB at the premises of the subscriber, LCO takes few days time to get the form filled and enter into the SMS along with all mandatory details. Hence it is suggested that **Pre-activated STBs along with only FTA channels should be allowed for a time period of 7 days.** If all mandatory details will not be entered within 7 days, then STBs, without CAF form details, will be disconnected temporarily till CAF details will not be entered into the Subscriber Management System.

2. In the context of clause 12 regarding Revenue settlement between LCO and MSO, it is suggested that along with the revenue settlement mechanism proposed by Hon'ble Authority, there should also be a mechanism namely **"Transfer Price"**. In this mechanism, *MSO will raise the invoice to the end subscriber and handover it to their respective LCO. In addition to this, MSO will also raise invoice/ Statement of Account (SoA) to LCO towards his share in the total billed amount. Now, LCO will be obliged to pay to MSO on actual basis.* In this mechanism, LCO will get his share much easier



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Also, as per HITS Guidelines issued by Ministry of Information and Broadcasting (MIB), a HITS operator, under no circumstances, can provide signals from his satellite directly to the end consumers. Therefore the mechanism of Transfer Price is most suitable for a HITS operator like us and our interconnected LCOs.

Apart from these issues, the other clauses of SIA proposed by TRAI are acceptable to NSTPL.

For Noida Software Technology Park Ltd



Authorised Signatory