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Subject: Comments on TRAI paper on Duration of Advt in TV Channels
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Sub: Comments on consultation on regulation on duration of advertisements in TV channels no 15 of 2012 related to advertise in TV channels dated 27 August 2012

We are aware that regulation of 14 May 2012 on the above subject is already challenged in Hon'ble TDSAT by Broadcasters to build pressure on TRAI to amend existing Regulations. We feel there is no need to amend them. The same regulation should stand.

Consumers are thoroughly exploited by the vested interest of Broadcasters. Since cable operators are in direct touch with consumer for service and Billing purpose, they get the DIRECT Feedback from them. Consumers do not have any reach to Broadcasters/ Govt Regulator (Everything is on English Websites). This is also outside the purview of Self Regulatory Committees of broadcasters as not related to content.

Thus, it is responsibility of TRAI to keep in mind CONSUMER interest and consumer viewing experience. Our Comments are given under.

2.1 No advt on pay TV should be there as due to Digital there is going to be total transparency.

2.2 Broadcasters earn from subscription and also Advertisement. They sell whole inventory of ads, paid news, paid interviews etc.

2.3 Many ads are inserted in the programmes as part of the programme like in sports events, TV serials etc. They look as part of the event or programme but are very disturbing and spoil the viewing experience of the consumer for which he pays heavily. These also must be counted in the time limit laid down by TRAI.

2.4 News channels are also becoming paid channels and are sold in bouquet of Channels by Aggregators. Why should consumer be penalised to watch news

channels full of various kind/types of advertisements?

2.5 Many channels including news channels have long hours of advertising from teleshopping companies. They sell all things, good or bad like tantric items, religious items, gold, exotic medicines with magical effects etc. Such advertisements are not counted in ads but they are not content too. Consumers get fed up with them because they keep repeating themselves. These must be regulated and some censorship should be there on them too. In many countries like UK, these ads are banned.

2.6 Broadcasters should choose one among Advertisement and subscription. They should not enjoy both in the name of CONSUMER interest & livelihood just because they can lobby Govt and regulator through their News Channels and are big powerful Media Houses.

2.7 News channels are bothered about their business interest, lobbying interest (most of the channels are owned by persons with vested interests) in GARB of Consumer interest and want consumer to pay for unwanted Advertisements.

2.8 News Broadcasters always try to pressurise Govt/ Regulator through their news channels. They never give cable operators/consumer view point in their channels rather they boycott the news. None of the channels has taken up digitalisation issue for discussion in the public, be it forced selling of STBs or FDI in broadcasting.

They only call CEOs of other news channels and make them guest speaker in channel or go and sit as guest in other channels.

Every order of TRAI has been challenged in TDSAT or Supreme Court by them. This shows their MONOPOLISTIC nature and dictator style. Since they also exist VERTICAL MONOPOLY, they get away befooling all.

3. Consumers have always been protesting against long disturbing advt in News items/ serials/ cricket matches, Religious Programmes etc.

4. Audio of Advertisement go very high which irritates consumers. At times consumer refuses to pay monthly bill. It causes noise pollution. Hence it should be covered under "Quality of Service"

5. Repetition of Advertisement and same advertisement on many channels gives irritating experience to consumers. They have irritating viewing experience.

6. In New digital Regime consumer has to pay for both Free to Air (FTA) and Pay TV. The channels full of/loaded with advertisements will give a very

irritant experience to consumers and they cannot complain to anyone as this is not covered as content. They cannot reach broadcasters. They have to go through LCO or MSO only.

With Regards

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23 September 2012

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