

**Comments of Ortel Communications Ltd. on Consultations papers issued
For Implementation of QoS in NON CAS Cable services.**

Chapter 4. Issues for Consultation

4.1 The issues for consultations are summarized below:

For Non-CAS Cable Services:

4.1.1 Please offer your comments on the areas and parameters of Quality of Service which need to be covered in such regulations (refer para 2.16)? Please offer comments whether QoS parameters should also be made applicable to voluntary CAS networks in non-CAS areas. If yes, then please indicate what should these parameters these parameters should be.

Subsequent to bringing cable services within the definition of Telecommunication services and in view of the objective sought to be achieved through such services setting up of a model QOS is imperative and called for. Particularly in view of the present scenario before us when various other Distribution platforms have come into being a gradual restructuring and for providing as an efficacious option before the consumers it the right time and right topic before all of us.

Ortel Communications Ltd welcomes the TRAI decision to work on for setting up of QoS Standard to provide Cable TV services in Non CAS areas. We are the first MSO in India who has voluntarily implemented Call Centre facility to provide 24Hrs. assistance to Customers including repair and maintenance of the services and contribute hereunder from the above experience.

Though the service besides commercial interest mostly deal with public utility services an in the said process take on the cause of the State to great extent still the service providers hardly get any support for the above cause from the State. This is an important field and which also affects any QOS mechanism adopted internally or mandated under the Regulation. So all authentic and legally laid networks, by the service providers, should be treated alike as property of State. With said support and subsequent QOS can only help one achieve the purpose. These includes expeditious grant of ROW, ensuring protection to the network, giving preference to the network and its purpose by Urban and State bodies.

The QOS parameters as laid for CAS areas take care of almost all issues. However in addition to same measures which is ancillary to the same as discussed also should be adopted.

We are one of the largest MSO who are providing voluntary CAS in the similar fashion than the other cable operator's providing services in CAS area.

But before implementing the QoS in Non CAS area Ortel would like to emphasize the need for adoption of recommendations for Cable TV restructuring earlier sent by TRAI to the Ministry. The regulations once adopted would ensure proper licensing system and regularize the system to a great extent.

Keeping in view all the above the QOS for Voluntary CAS areas as well as in basic service tier should be mandated and we propose for:

1. Prescription of Designed Coaxial, digital, addressable, return path enable cable network.
2. A 24 Hrs. Call Centre with a Toll free No. to provide Customer Care services.
3. Quality of Service and Customer Handling should be monitored by TRAI.
4. Annexure A is sufficient to be adopted for better customer care services.

We recommend the BIS standard IS-13420 to deliver the Signal with following

Parameters as under-

C/N >44dB

Minimum Carrier level 60dB

Maximum Carrier level 80dB

Slope < 12 dB

X-mod > 57dB

CSO > 57dB

We also propose simplified distribution chain to be developed by Broadcasters for ensuring better services.

It is possible only in the case when the signal is delivered to the customer with minimum interference as possible.

4.1.2 In particular, comments and suggestions are invited for effective and transparent monitoring and implementation of proper billing, to protect consumers' interests.

The Non-CAS tariff order prescribes for the billing requirements and same takes care of the interest of consumer to the full extent.

However till the inter connection issues are resolved and a-la-carta pricing of channels or any mechanism is developed there can not be any billing procedure for the same.

However, to promote the concept and cause TRAI should fix a minimum price to be charged by the distributor of services to its consumers for the STBs and subscription charges. The charge should be as per slab taking into account the number of channels provided in STBs.

4.1.3 There is an expectation that the State Governments and the Ministry of Information & Broadcasting will extend necessary cooperation in the effective implementation of QoS Regulations. Can you suggest any other

supplemental measures for further strengthening the implementation of QOS Regulations?

Besides the present contemplation for proper implementation of QOS there should be always Self Monitoring Mechanism and Redressal of complaints/issues in the designated authorities appointed by the Distributor on hierarchy basis as original and appellate authority. Even appointment of Ombudsman either internally or for a region should be explored for effective implementation of the QOS.

4.1.4 Please offer your view on any other issues which will make the Regulations more complete and effective.

Besides regulatory bodies the appointment and formation of community bodies and organisations with due approval of TRAI should be encouraged. They should advice small but issues in the field for betterment of the system.