

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

### 1. This 'Consultation Paper is regarding 'Review of Regulatory Framework for Broadcasting and Cable services'<sup>7</sup>.

(a) The various aspects covered are:

- (i) Tariff
- (ii) Interconnection
- (iii) QoS

(b) The Telecom Regulatory Authority of India (TRAI) on 3<sup>rd</sup> March 2017 notified the new regulatory framework and after a number of intervening regulations, amendments were issued to the Principal Regulatory Framework 2017, on 1<sup>st</sup> January 2020<sup>8,9,10</sup>

(c)(i) **Regulations mentioned** in the extant CP<sup>11</sup> are:

- (i.) The Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff Order, 2017 (Tariff Order 2017);
- (ii.) The Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017 (Interconnection Regulations, 2017);
- (iii.) The Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations, 2017 (QoS Regulations, 2017). Salient features of 'the Framework 2017' are given in **Annexure I**.

1.2 In order to address the issues noted during implementation of the Framework 2017 'the Authority, after due consultation, notified the following amendments to the Regulatory Framework 2017, on 1st January 2020:

- (i.) The Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff (Second Amendment) Order, 2020 (Tariff Amendment Order 2020)
- (ii.) The Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Second Amendment) Regulations, 2020 (Interconnection Amendment Regulations, 2020)
- (iii.) The Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) (Third Amendment) Regulations, 2020 (QoS Amendment Regulations, 2020)<sup>12</sup>

(d) The following entry regarding **NCF** in the extant CP<sup>13</sup> may please be noted:

*'81. Accordingly, in order to protect the interests of consumers and in view of the fact that (a) many DPOs are already providing more than 200 channels for existing NCF of Rs. 130/-*

*(b) Revenue realisation for major DPOs corresponding to NCF is also not more than Rs. 130/-*

*(c) there is no incremental cost to DPOs for additional channels, the Authority has decided that DPOs shall offer 200 channels for NCF of Rs. 130/- in addition to such number of channels as may be mandated by the Government from time to time for mandatory provisioning.'*<sup>14</sup>

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

3. Authority issued a letter dated 12<sup>th</sup> October 2021 to all broadcasters seeking compliance with all the provisions of amended Framework 2020-----  
Consequently, most of the broadcasters submitted their Reference Interconnect Offer (RIO's) to TRAI in line with amended Framework 2020 and also published these on their websites in November 2021<sup>15</sup>.

1. Apparently there are issues remaining as 'The stakeholders requested TRAI to enable smooth implementation of the amended framework 2020'<sup>16</sup>.

(a) 'some stakeholders suggested that to avoid likely disruption for consumers, some provisions of the amended framework 2020 may be considered for revision'<sup>17</sup>.

(a) Accordingly issues identified after discussions with stakeholders and forming the basis of extant CP<sup>18</sup> are as follows:

(i)**Chapter II** Issues related to Tariff for Broadcasting and Cable services<sup>19</sup>

(ii)**Chapter III** Issues related to Interconnection for Broadcasting and Cable Services<sup>20</sup>

(iii)**Chapter IV** Issues related to Standards of Quality of Service (QoS) and Consumer Protection Regulations for Broadcasting and Cable Services<sup>21</sup>

4. The phrase 'level playing field' is occurring '9' times in the Extant CP<sup>22</sup> and distribution of context of use of the same is as follows:

'one time' as objective of TRAI.<sup>23</sup>

'one time' w.r.t customer a.k.a user, subscriber.<sup>24</sup>

'three times' w.r.t service provider<sup>25</sup> &

'four times' w.r.t DD free Dish.<sup>26</sup>

1. The 'level playing field' also finds a mention in comments of stake holders<sup>27,28,29,30,31,32,33,34,35,36,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,53,</sup>

(a) '2. The primary issue in the Consultation Paper concerning Prasar Bharati is the issue raised by DTH Operators seeking a level playing field with DD Free Dish.<sup>54</sup>

(i) Prasar Bharati responded as in<sup>55</sup>.

(b) 'At present, Broadcaster's RIOs are not approved by TRAI but the DPO's RIOs are. Therefore, in order to have a level playing field, both RIO's should have the same regulatory status.<sup>56</sup>

5. Various reasons have been put forward by Stakeholders for eroding subscriber base.

(a) Like:

(i) 'Escalating subscription costs have resulted in DPOs losing millions of subscribers each quarter.<sup>57</sup>

(ii) '2017, Cable TV subscribers were 110 million, and in 2023 the Cable TV subscribers have been reduced to 65 million'<sup>58</sup>.

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

(iii) 'the subscriber base of DTH platforms is alarmingly reducing as the DTH Operators are unable to compete with the packaging and price offerings of OTT and DD Free Dish, which are outside the purview of TRAI Regulations'<sup>59</sup>.

6. "**Cord-Cutting**" is mentioned in comments by Times

Network<sup>60</sup>. Notwithstanding the context in which 'cord-cutting' has been used by 'Times Network' in their document, the phenomenon may be much wider, may be the prime cause of reducing subscribers base of DPO's in India considering that 'A person who switches from a pay TV subscription (cable, satellite or telephone company) to an Internet-based streaming service such as Netflix. The purpose of cord cutting is to save a considerable amount of money each month.

A "cord never" or "never-connected" is someone who never had such a subscription, while "cord shavers" are subscribers who have reduced their pay TV fees by eliminating certain channels. A "cord stacker" is someone who subscribes to both pay TV and one or more streaming services.'<sup>61</sup>

7. Nether the issue of convergence has been referred to in the extant CP<sup>62</sup> nor taken into account explicitly by stake holders in the comments of stake holders.

8. The Time Line of implementation The Principal Regulation 2017 (**NTO.1**) as amended TRAI regulations 2020(**NTO.2**) is as follows:

i. The Regulatory Framework consisting of the Telecommunications (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017, the Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff Order, 2017, and the Telecommunications (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations, 2017, (collectively referred as NTO-1) was implemented by TRAI w.e.f. 1.02.2019'<sup>63</sup>.

v. NTO-1 was subsequently amended in 2020 vide the NTO-2, which consisted of Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff (Second Amendment) Order, 2020; Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) (Second Amendment) Regulations, 2020; and Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) (Third Amendment) Regulations, 2020.

vi. The Regulatory Framework was further amended on 22.11.2022 and was implemented with effect from 1.02.2023 to address some difficulties faced by the broadcasters due to NTO-2 regulations'<sup>64</sup>.

### 9. Interoperability:

(a) Regarding Interoperability 'four consultation papers' have been issued.<sup>65</sup> till date over a span of 'ten years' 2010 to 2019 but inconclusive.

(i) The only tangible benefit which appears to be achievable is '• A consumer becomes real decision maker of what she/he views and has complete freedom to choose what he/she wishes to watch and pay only for that. It is mandated that all

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

channels have to be offered on a-la-carte basis and the MRP has to be declared. Same way, the MRP of the Bouquet has to be published.<sup>66</sup>

(b) Still consumer is dependent on service provider for CPE (Consumer Premises Equipment).

(i) The said dependency needs to be removed by a suitable regulation.

10. 'Regulatory Impact Assessments

'• As a general rule, we would propose that TRAI should consider in detail the impact on the industry of each regulatory initiative it proposes. There are well-established global guidelines for Regulatory Impact Assessments<sup>267</sup>, which are designed to create a framework for governments to assess whether and how to regulate; we would suggest that TRAI incorporate these internationally-validated approaches into its standard practices.<sup>68</sup>

## Summary of Issues for Consultation

### A. Tariff related issues

**Q1.** Should the present ceiling of Rs.130/- on NCF be reviewed and revised?

a. If yes, please provide justification for the review and revision.

b. If yes, please also suggest the methodology and provide details of calculation to arrive at such revised ceiling price.

c. If not, provide reasons with justification as to why NCF should not be revised.

d. Should TRAI consider and remove the NCF capping?

**Q2.** Should TRAI follow any indices (like CPI/WPI/GDP Deflator) for revision of NCF on a periodic basis to arrive at the revised ceiling? If yes, what should be the periodicity and index? Please provide your comments with detailed justification.

**Q3.** Whether DPOs should be allowed to have variable NCF for different bouquets/plans for and within a state/ City/ Town/ Village? If yes, should there be some defined parameters for such variable NCF? Please provide detailed reasons/ justification. Will there be any adverse impact on any stakeholder, if variable NCF is considered?

**Q4.** Should TRAI revise the current provision that NCF for 2<sup>nd</sup> TV connection and onwards in multi-TV homes should not be more than 40% of declared NCF per additional TV?

a. If yes, provide suggestions on quantitative rationale to be followed to arrive at an optimal discount rate.

b. If no, why? Please provide justification for not reconsidering the discount.

c. Should TRAI consider removing the NCF capping for multi TV homes? Please provide justification?

**Q5.** In the case of multi-TV homes, should the pay television channels or each additional TV connection be also made available at a discounted price?

a) If yes, please suggest the quantum of discount on MRP of television channel/ Bouquet for 2<sup>nd</sup> and subsequent television connection in a multi-TV home. Does multi-TV home or single TV home make a difference to the broadcaster? What

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

mechanism should be available to pay-channel broadcasters to verify the number of subscribers reported for multi-TV homes?

b) If not, the reasons thereof?

**Q6.** Is there a need to review the ceiling on discount on sum of MRP of a-la-carte channels in a bouquet (as prescribed through the second proviso to clause 4 (4) of the Tariff Order 2017) while fixing the MRP of that bouquet by DPOs?

a. If yes, what should be the ceiling on such discount? Justify with reasons.

b. If not, why? Please provide justification for not reviewing the ceiling

**Q7.** Whether the total channel carrying capacity of a DPO be defined in terms of bandwidth (in MBPS) assigned to specific channel(s). If yes, what should be the quantum of bandwidth assigned to SD and HD channels. Please provide your comments with proper justification and examples.

**Q8.** Whether the extant prescribed HD/SD ratio which treats 1HD channel equivalent to 2SD channels for the purpose of counting number of channels in NCF should also be reviewed?

a. If yes, should there be a ratio/quantum? Or alternatively should each channel be considered as one channel irrespective of its type (HD or SD or any other type like 4K channel)? Justify with reasons.

b. If no, please justify your response.

**Q9.** What measures should be taken to ensure similar reception quality to subscribers for similar genre of channels? Please suggest the parameter(s) that should be monitored/ checked to ensure that no television channel is discriminated against by a

DPO. Please provide detailed response with technical details and justification.

**Q10.** Should there be a provision to mandatorily provide the Free to Air News / Non-News / Newly Launched channels available on the platform of a DPO to all the subscribers?

a. If yes, please provide your justification for the same with detailed terms and conditions.

b. If not, please substantiate your response with detailed reasoning.

**Q11.** Should Tariff Order 2017, Interconnection Regulations 2017 and Quality of Service Regulations 2017 be made applicable to nonaddressable distribution platforms such as DD Free Dish also?

**Q12.** Should the channels available on DD Free Dish platform be mandatorily made available as Free to Air Channels for all the platforms including all the DPOs?

**Q13.** Whether there is a need to consider upgradation of DD Free Dish as an addressable platform? If yes, what technology/ mechanism is suggested for making all the STBs addressable? What would be the cost implications for existing and new consumers? Elaborate the suggested migration methodology with suggested time-period for proposed plan. Please provide your response, with justification.

R B Sahajpal

nurbaks78@gmail.com



## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

### B. Interconnection related issues

**Q14.** 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

a. If yes, how the issue of differential pricing of television channel by different DPOs be addressed?

b. If no, then how should the business continuity interest of DPO be protected?

**Q15.** Sometimes, the amendment in RIO becomes expedient due to amendment in extant Regulation/ Tariff order. Should such amendment of RIO be treated in a different manner? Please elaborate and provide full justification for your comment.

**Q16.** 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 31<sup>st</sup> December every year. Please justify your response.

**Q17.** Should flexibility be given to DPOs for listing of channels in EPG?

a. If yes, how should the interest of broadcasters (especially small ones) be safeguarded?

b. If no, what criteria should be followed so that it promotes level playing field and safeguard interest of each stakeholder?

**Q18.** Since MIB generally gives permission to a channel in multiple languages, how the placement of such channels may be regulated so that interests of all stakeholders are protected?

**Q19.** Should the revenue share between an MSO (including HITS Operator) and LCO as prescribed in Standard Interconnect Agreement be considered for a review?

a. If yes:

i. Should the current revenue share on NCF be considered for a revision?

ii. Should the regulations prescribe revenue share on other revenue components like Distribution Fee for Pay

Channels, Discount on pay channels etc.? Please list all the revenue components along-with the suggested revenue share that should accrue to LCO. Please provide quantitative calculations made for arriving at suggested revenue share along-with detailed comments /justification.

b. If no, please justify your comments.

**Q20.** Should there be review of capping on carriage fee?

a. If yes, how much it should be so that the interests of all stakeholders be safeguarded. Please provide rationale along with supporting data for the same.

b. If no, please justify how the interest of all stakeholders especially the small broadcasters can be safeguarded?

**Q21.** To increase penetration of HD channels, should the rate of carriage fee on HD channels and the cap on carriage fee on HD channels may be reduced. If yes, please specify the modified rate of carriage fee and the cap on carriage fee on HD channels. Please support your response with proper justification.

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

**Q22.** Should TRAI consider removing capping on carriage fee for introducing forbearance? Please justify your response.

**Q23.** In respect of DPO's RIO based agreement, if the broadcaster and DPO fail to enter into new interconnection agreement before the expiry of the existing agreement, the extant Interconnection Regulation provide that if the parties fail to enter into new agreement, DPO shall not discontinue carrying a television channel, if the signals of such television channel remain available for distribution and the monthly subscription percentage for that television channel is more than twenty percent of the monthly average active subscriber base in the target market. Does this specified percentage of 20 percent need a review? If yes, what should be the revised prescribed percentage of the monthly average active subscriber base of DPO. Please provide justification for your response.

C. Quality of Service related issues

**Q24.** Whether the extant charges prescribed under the 'QoS Regulations' need any modification required for the same? If yes, justify with detailed explanation for the review of:

- a. Installation and Activation Charges for a new connection
- b. Temporary suspension of broadcasting services
- c. Visiting Charge in respect of registered complaint in the case of DTH services
- d. Relocation of connection
- e. Any other charges that need to be reviewed or prescribed.

**Q25.** Should TRAI consider removing capping on the above-mentioned charges for introducing forbearance? Please justify your response.

**Q26.** Whether the Electronic Programme Guide (EPG) for consumer convenience should display

- a. MRP only
- b. MRP with DRP alongside
- c. DRP only?

Justify your response by giving appropriate explanations.

**Q27.** What periodicity should be adopted in the case of pre-paid billing system. Please comment with detailed justification.

**Q28.** Should the current periodicity for submitting subscriber channel viewership information to broadcasters be reviewed to ensure that the viewership data of every subscriber, even those who opt for the channel even for a day, is included in the reports? Please provide your comments in detail.

**Q29.** MIB in its guidelines in respect of Platform Services has *inter-alia* stated the following:

- a. The Platform Services Channels shall be categorised under the genre 'Platform Services' in the EPG.
- b. Respective MRP of the platform service shall be displayed in the EPG against each platform service.
- c. The DPO shall provide an option of activation /deactivation of platform services.

In view of above, you are requested to provide your comments for

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

suitable incorporation of the above mentioned or any other provisions w.r.t. Platform Services channels of DPOs in the 'QoS Regulations'.

**Q30.** Is there a need to re-evaluate the provisions outlined in the 'QoS Regulations' in respect of:

- a. Toll-free customer care number
- b. Establishment of website
- c. Consumer Corner
- d. Subscriber Corner
- e. Manual of Practice
- f. Any other provision that needs to be re-assessed

Please justify your comments with detailed explanations.

### **D. Financial Disincentive**

**Q31.** Should a financial disincentive be levied in case a service provider is found in violation of any provisions of Tariff Order, Interconnection Regulations and Quality of Service Regulations?

a. If yes, please provide answers to the following questions:

i. What should be the amount of financial disincentive for respective service provider? Should there be a category of major/ minor violations for prescription of differential financial disincentive? Please provide list of such violation and category thereof. Please provide justification for your response.

ii. How much time should be provided to the service provider to comply with regulation and payment of financial disincentive. and taking with extant regulations/tariff order?

iii. In case the service provider does not comply within the stipulated time how much additional financial disincentive should be levied? Should there be a provision to levy interest on delayed payment of Financial Disincentive?

1. If yes, what should be the interest rate?

2. In no, what other measures should be taken to ensure recovery of financial disincentive and regulatory compliance?

iv. In case of loss to the consumer due to violation, how the consumer may be compensated for such default?

b. If no, then how should it be ensured that the service provider complies with the provisions of Tariff Order, Interconnection Regulations and Quality of Service Regulations?

**Ans. Q1. Q31.-** No specific comments. Please refer **Ans. 32.** also.

### **E. Any other issue**

**Q32.** Stakeholders may provide their comments with full details and justification on any other matter related to the issues raised in present consultation.

**Ans.32.**

### **Part 'A'**

1. Kindly refer to paras **1.4, 1.4.1, 1.4.1(a), 1.4.1(b)** above accordingly:

(a) It is not possible to have a **universal definition** for the phrase 'level playing field' which may be suitable in all contexts of the use of the same viz,;

R B Sahajpal

nurbaks78@gmail.com



## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

(b) '2. The primary issue in the Consultation Paper concerning Prasar Bharati is the issue raised by DTH Operators seeking a level playing field with DD Free Dish.<sup>69</sup>

2. Kindly refer to paras **1.5, 1.5(a)(i)(ii)(iii), 1.6, 1.7** above about varying reasons put forth by stake holders for rapidly diminishing subscriber/customer/user base of DPO's.

(a) Most probably, nay, really is **CONVERGENCE & alternate options** available for the type of content being provided by DPO's. Accordingly:

(i) Any upward revision in various charges already notified will not be justified and will be against the interest of customers.

(iii) Declining customer base may be due to the phenomenon of "Cord Cutting"

3. Kindly refer to paras **1.8, 1.8(i), 1.8(1)** above regarding timeline of implementation principal regulations 2017 a.k.a (**NT-1** as amended **NTO-2**). The extent of implementation (100%age or ----%age) is neither available in extant CP or comments of worthy stake holders).

4. Kindly refer paras **1.9, 1.9(a), (b)** above regarding Interoperability of DTH Set top Boxes. The Interoperability will give the customer the freedom of choice of having not only the CPE of his/her choice but also the choice of DTH provider as CPE will not go waste if customer chooses change DTH provider.

5. Kindly refer to para **1.10** above.

(i) Regulator need to undertake periodic Regulatory Impact Analysis to have a data base for informed midstream corrections/modifications in the Regulatory Framework even those of expedient nature.

### Part B

#### Submitted for kind consideration

I. Kindly refer para 1. above:

1. The use of phrase '**Level Playing Field**' may be held in abeyance in view of **Part A** paras 1., 1(a), 1(b) above till a definition is developed by **TRAI** for a universal use of all including various stake holders covering all eventualities.

(a) In the meantime each related issue may be processed case by case basis.

2. Kindly refer to para 2. above:

The presence of phenomena of convergence & cord cutting may be given due weight-age instead of burdening the consumer with enhanced charges by regulatory process to compensate DPOs' for loss of customer base. This may accelerate the rate of loss. Perhaps reduced charges voluntarily by DPOs' may halt downward trend of loss of customers.

3. Kindly refer to para 3. above:

The extent of implementation of principal regulation as amended may be put in public domain as part of Regulatory Impact Analysis and as part of consultation process.

4. Kindly refer para 4. above:

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

The case of **Interoperable STB** for DTH may be taken up in right earnest again. It is almost 13 years since the issue was taken up first.

a) The provision of CPE (installation of Dish with associated electronics, lead in cable, STB may be arranged by the customer customer.

5. Kindly refer para 5. above:

Regulatory Impact Analysis periodically may help in evaluating the Regulatory Framework. If felt so earlier the better.

## References

1. [https://traigov.in/sites/default/files/CP\\_08082023\\_0.pdf](https://traigov.in/sites/default/files/CP_08082023_0.pdf)
2. [https://traigov.in/sites/default/files/PR\\_No.69of2023.pdf](https://traigov.in/sites/default/files/PR_No.69of2023.pdf)
3. [https://traigov.in/sites/default/files/PR\\_No.79of2023.pdf](https://traigov.in/sites/default/files/PR_No.79of2023.pdf)
4. [https://traigov.in/sites/default/files/PR\\_No.85of2023.pdf](https://traigov.in/sites/default/files/PR_No.85of2023.pdf)
5. [https://traigov.in/sites/default/files/PR\\_No.102of2023.pdf](https://traigov.in/sites/default/files/PR_No.102of2023.pdf)
6. [https://traigov.in/sites/default/files/PR\\_No.115of2023\\_0.pdf](https://traigov.in/sites/default/files/PR_No.115of2023_0.pdf)
7. page '1/124' of reference supra '1'.
8.
  1. [https://traigov.in/sites/default/files/Tariff\\_Order\\_English\\_3%20March\\_2017.pdf](https://traigov.in/sites/default/files/Tariff_Order_English_3%20March_2017.pdf) (Main)
  2. [https://traigov.in/sites/default/files/Tariff\\_Amendment\\_Order\\_Eng\\_3032017.pdf](https://traigov.in/sites/default/files/Tariff_Amendment_Order_Eng_3032017.pdf) (Amendment)
  3. [https://traigov.in/sites/default/files/Regulation\\_Tariff\\_Order\\_01012020.pdf](https://traigov.in/sites/default/files/Regulation_Tariff_Order_01012020.pdf) (Second Amendment)
  4. [https://traigov.in/sites/default/files/Regulation\\_22112022.pdf](https://traigov.in/sites/default/files/Regulation_22112022.pdf) (Third Amendment)
9.
  1. [https://traigov.in/sites/default/files/Interconnection\\_Regulation\\_03\\_mar\\_2917.pdf](https://traigov.in/sites/default/files/Interconnection_Regulation_03_mar_2917.pdf) (Main)
  2. [https://traigov.in/sites/default/files/Regulation\\_04092019.pdf](https://traigov.in/sites/default/files/Regulation_04092019.pdf) (Register of Agreements)
  3. [https://traigov.in/sites/default/files/Regulation\\_30102019.pdf](https://traigov.in/sites/default/files/Regulation_30102019.pdf) (Amendment)
  4. [https://traigov.in/sites/default/files/Regulation\\_01012020.pdf](https://traigov.in/sites/default/files/Regulation_01012020.pdf) (Second Amendment)
  5. [https://traigov.in/sites/default/files/Regulation\\_11062021.pdf](https://traigov.in/sites/default/files/Regulation_11062021.pdf) (Third Amendment)
  6. [https://traigov.in/sites/default/files/Regulation\\_Interconnection\\_22112022.pdf](https://traigov.in/sites/default/files/Regulation_Interconnection_22112022.pdf) (Fourth Amendment)
  7. [https://traigov.in/sites/default/files/Regulation\\_15092023\\_0.pdf](https://traigov.in/sites/default/files/Regulation_15092023_0.pdf) (Fifth Amendment)
10.
  1. [https://traigov.in/sites/default/files/QOS\\_Regulation\\_03\\_03\\_2017.pdf](https://traigov.in/sites/default/files/QOS_Regulation_03_03_2017.pdf) (Main)
  2. <https://traigov.in/sites/default/files/Regulations28122018.pdf> (First)
  3. [https://traigov.in/sites/default/files/Regulation\\_09102019.pdf](https://traigov.in/sites/default/files/Regulation_09102019.pdf) (Second)
  4. <https://traigov.in/release-publication/regulations/amendments-page/94215> (API)
  5. [https://traigov.in/sites/default/files/Regulation\\_QoS\\_01012020.pdf](https://traigov.in/sites/default/files/Regulation_QoS_01012020.pdf) (Third)
11. para '1.1 of supra reference '1'.
12. para 1.2 of supra reference '1'.
13. para 2.5 of supra reference '1'.
14. para '81' page 22/124 of supra '1'.
15. para '18' of supra reference '1'.
16. para 1.15 page 11/124 of reference supra '1'.
17. *ibid.*

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

18. supra reference '1'.
19. page '18/124' of supra reference '1'.
20. page '47/124' of supra reference '1'.
21. page '67/124' of supra reference '1'.
22. supra reference '1'.
23. para '1' page ('7/124') of reference supra '1'.
24. para '3.5' page '48/124' of reference '1'.
25. paras 'Q17.b', 'f', 'b' pages (54,61,97)/124 respectively of supra '1'.
26. paras '1.24', 'f', 'F', '2.47' pages ('14', '18', '39', '48')/124 respectively of supra '1'.
27. Q.17 page '6/11' of reference 69.85.
28. page '1/14' of reference 69.84.
29. page '1/14' of reference 69.83.
30. pages ('1', '2', ('3'Q3), ('8'Q11, Q12), ('9'Q17b))/15 respectively of reference 69.82.
31. pages ('1', '2', ('3'Q3), ('8'Q11, Q12), ('9'Q17b))/15 respectively of reference 69.81.
32. pages ('1', '2', ('3'Q3), ('8'Q11, Q12), ('9'Q17b))/15 respectively of reference 69.80.
33. pages ('1', '2', ('3'Q3), ('8'Q11, Q12), ('9'Q17b))/15 respectively of reference 69.79.
34. pages ('1', '2', ('3'Q3), ('8'Q11, Q12), ('9'Q17b))/15 respectively of reference 69.79.
35. page '1/6' of reference 69.78.
36. page '1/6' of reference 69.76.
37. page '1/6' of reference 69.75.
38. page '1/6' of reference 69.73.
39. page '1/6' of reference 69.72.
40. page '1/3' of reference 69.71.
41. page '1/3' of reference 68.70.
42. page '1/7' of reference 69.69.
43. page '1/3' of reference 69.68.
44. page '1/14' of reference 69.67.
45. page '1/3' of reference 69.66.
46. page '1/6' of reference 69.65.
47. page '1/3' of reference 69.64.
48. pages (38,39,41,42,46) of reference 69.63.
49. page '1/7' of reference 69.41.
50. page '1/15' of reference 69.42.
51. page '1/6' of reference 69.43.
52. pages(4,6 four times,7 two times,(9,10,11) one time))=15 times of reference 35.44.
53. pages(2,15,36 two times,38 two times,44)/51 of reference 69.4.
54. para '2' of reference 69.24.
55. paras '3' to '35' of reference 69.24.
56. Q14. Para 11 of reference 69.4.
57. Para '43' of reference 69.63.
58. Para "10' Q4 page 26 of reference 35.62.
59. Q6 page 4/15 of reference 69.4.
60. page 13/24 reference 69.26.
61. <https://www.pcmag.com/encyclopedia/term/cord-cutter>
62. para (i) page 2/25 of reference 69.9.
63. para (vi) page '3/25' of reference 35.9.

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

64. supra reference '1'.

65.

1. <https://traigov.in/sites/default/files/bandcsconsulta20agu10.pdf>
2. [https://traigov.in/sites/default/files/CPE-draft-27022015\\_0.pdf](https://traigov.in/sites/default/files/CPE-draft-27022015_0.pdf)
3. [https://traigov.in/sites/default/files/Pre\\_consultation\\_paper\\_on\\_interoperability\\_final.pdf](https://traigov.in/sites/default/files/Pre_consultation_paper_on_interoperability_final.pdf)
4. [https://traigov.in/sites/default/files/CP\\_STB\\_Interoperable\\_1112019.pdf](https://traigov.in/sites/default/files/CP_STB_Interoperable_1112019.pdf)

66. Bullet 'First' Annexure '1' of supra reference '1'.

67. page 2/3 of reference 35.5.

68. <https://www.oecd.org/gov/regulatory-policy/regulatory-impact-assessment-7a9638cb-en.htm>

69.

- \*1. [https://traigov.in/sites/default/files/ISPAI\\_12102023.pdf](https://traigov.in/sites/default/files/ISPAI_12102023.pdf) (26)
- \*2. [https://traigov.in/sites/default/files/CII\\_12102023.pdf](https://traigov.in/sites/default/files/CII_12102023.pdf) (2)
- \*3. [https://traigov.in/sites/default/files/Digital\\_Cable\\_Operator\\_Association\\_12102023.pdf](https://traigov.in/sites/default/files/Digital_Cable_Operator_Association_12102023.pdf) (13)
- \*4. [https://traigov.in/sites/default/files/AIDCF\\_12102023.pdf](https://traigov.in/sites/default/files/AIDCF_12102023.pdf) (51)
- \*5. [https://traigov.in/sites/default/files/avia\\_12102023.pdf](https://traigov.in/sites/default/files/avia_12102023.pdf) (3)
- \*6. [https://traigov.in/sites/default/files/Ideal\\_Cable\\_Operator\\_Association\\_12102023.pdf](https://traigov.in/sites/default/files/Ideal_Cable_Operator_Association_12102023.pdf) (10)
- \*7. [https://traigov.in/sites/default/files/KOLKATA\\_WELFARE\\_ASSOCIATION\\_OF\\_BROADBAND\\_AND\\_CABLE\\_TV\\_12102023.pdf](https://traigov.in/sites/default/files/KOLKATA_WELFARE_ASSOCIATION_OF_BROADBAND_AND_CABLE_TV_12102023.pdf) (15)
8. [https://traigov.in/sites/default/files/IBDF\\_12102023.pdf](https://traigov.in/sites/default/files/IBDF_12102023.pdf) (23)
9. [https://traigov.in/sites/default/files/NBDA\\_12102023.pdf](https://traigov.in/sites/default/files/NBDA_12102023.pdf) (25)
10. [https://traigov.in/sites/default/files/Digital\\_Service\\_Provider\\_Federation\\_12102023.pdf](https://traigov.in/sites/default/files/Digital_Service_Provider_Federation_12102023.pdf) (29)
11. [https://traigov.in/sites/default/files/cable\\_operators\\_sevabhavi\\_organization\\_12102023.pdf](https://traigov.in/sites/default/files/cable_operators_sevabhavi_organization_12102023.pdf) (14)
12. [https://traigov.in/sites/default/files/Ideal\\_Cable\\_TV\\_Association\\_12102023.pdf](https://traigov.in/sites/default/files/Ideal_Cable_TV_Association_12102023.pdf) (17)
13. [https://traigov.in/sites/default/files/DCBOA\\_16102023.pdf](https://traigov.in/sites/default/files/DCBOA_16102023.pdf) (19)
- \*14. [https://traigov.in/sites/default/files/USIBC\\_12102023.pdf](https://traigov.in/sites/default/files/USIBC_12102023.pdf) (4)
- \*15. [https://traigov.in/sites/default/files/USISPF\\_12102023.pdf](https://traigov.in/sites/default/files/USISPF_12102023.pdf) (3)
16. [https://traigov.in/sites/default/files/PHDCCI\\_16102023.pdf](https://traigov.in/sites/default/files/PHDCCI_16102023.pdf) (14)
17. [https://traigov.in/sites/default/files/Rajiv\\_Khattar\\_12102023.pdf](https://traigov.in/sites/default/files/Rajiv_Khattar_12102023.pdf) (9)
- \*18. [https://traigov.in/sites/default/files/Amit\\_Madan\\_12102023.pdf](https://traigov.in/sites/default/files/Amit_Madan_12102023.pdf) (2)
- \*19. [https://traigov.in/sites/default/files/Harsha\\_12102023.pdf](https://traigov.in/sites/default/files/Harsha_12102023.pdf) (1)
- \*20. [https://traigov.in/sites/default/files/Himesh\\_Kumar\\_12102023.pdf](https://traigov.in/sites/default/files/Himesh_Kumar_12102023.pdf) (1)
- \*21. [https://traigov.in/sites/default/files/joydeep\\_Kapadia\\_12102023.pdf](https://traigov.in/sites/default/files/joydeep_Kapadia_12102023.pdf) (2)
- \*22. [https://traigov.in/sites/default/files/ST\\_Balamurugan\\_12102023.pdf](https://traigov.in/sites/default/files/ST_Balamurugan_12102023.pdf) (8)
23. [https://traigov.in/sites/default/files/Den\\_Network\\_Limited\\_12102023.pdf](https://traigov.in/sites/default/files/Den_Network_Limited_12102023.pdf) (58)
- \*24. [https://traigov.in/sites/default/files/Prasar\\_Bharti\\_12102023.pdf](https://traigov.in/sites/default/files/Prasar_Bharti_12102023.pdf) (11)
- \*25. [https://traigov.in/sites/default/files/ZEEL\\_12102023.pdf](https://traigov.in/sites/default/files/ZEEL_12102023.pdf) (22)
- \*26. [https://traigov.in/sites/default/files/Times\\_Network\\_12102023.pdf](https://traigov.in/sites/default/files/Times_Network_12102023.pdf) (24)
27. [https://traigov.in/sites/default/files/Dish\\_TV\\_12102023.pdf](https://traigov.in/sites/default/files/Dish_TV_12102023.pdf) (26)
28. [https://traigov.in/sites/default/files/SUN\\_Direct\\_16102023.pdf](https://traigov.in/sites/default/files/SUN_Direct_16102023.pdf) (29)
29. [https://traigov.in/sites/default/files/Eenadu\\_Televisio\\_%2013102023.pdf](https://traigov.in/sites/default/files/Eenadu_Televisio_%2013102023.pdf) (13)
30. [https://traigov.in/sites/default/files/Siti\\_Network\\_12102023.pdf](https://traigov.in/sites/default/files/Siti_Network_12102023.pdf) (21)
31. [https://traigov.in/sites/default/files/ACT\\_DIGITAL\\_HOME\\_ENTERTAINMENT\\_12102023.pdf](https://traigov.in/sites/default/files/ACT_DIGITAL_HOME_ENTERTAINMENT_12102023.pdf) (12)

R B Sahajpal

nurbaks78@gmail.com

## Counter Comments

TRAI CP<sup>1</sup> PR<sup>2,3,4,5,6</sup>

32. [https://traf.gov.in/sites/default/files/TELEVIEW\\_12102023.pdf](https://traf.gov.in/sites/default/files/TELEVIEW_12102023.pdf) (3)
33. [https://traf.gov.in/sites/default/files/Sukanta\\_Satellite\\_Service\\_12102023.pdf](https://traf.gov.in/sites/default/files/Sukanta_Satellite_Service_12102023.pdf) (15)
34. <https://traf.gov.in/consultation-paper-review-regulatory-framework-broadcasting-and-cable-service> (15)
35. [https://traf.gov.in/sites/default/files/A\\_K\\_Star\\_Cable\\_Network\\_12102023.pdf](https://traf.gov.in/sites/default/files/A_K_Star_Cable_Network_12102023.pdf) (14)
36. [https://traf.gov.in/sites/default/files/Showman\\_Communications\\_12102023.pdf](https://traf.gov.in/sites/default/files/Showman_Communications_12102023.pdf) (15)
37. [https://traf.gov.in/sites/default/files/ABP\\_Network\\_12102023.pdf](https://traf.gov.in/sites/default/files/ABP_Network_12102023.pdf) (8)
38. [https://traf.gov.in/sites/default/files/Akangsha\\_Net\\_12102023.pdf](https://traf.gov.in/sites/default/files/Akangsha_Net_12102023.pdf) (6)
39. [https://traf.gov.in/sites/default/files/Dolon\\_Communication\\_12102023.pdf](https://traf.gov.in/sites/default/files/Dolon_Communication_12102023.pdf) (15)
40. [https://traf.gov.in/sites/default/files/Dolon\\_Communication\\_12102023.pdf](https://traf.gov.in/sites/default/files/Dolon_Communication_12102023.pdf) (15)
- \*41. [https://traf.gov.in/sites/default/files/ABHIJIT\\_MULLICK\\_12102023.pdf](https://traf.gov.in/sites/default/files/ABHIJIT_MULLICK_12102023.pdf) (7)
- \*42. [https://traf.gov.in/sites/default/files/ANIRBAN\\_DAS\\_12102023.pdf](https://traf.gov.in/sites/default/files/ANIRBAN_DAS_12102023.pdf) (15)
- \*43. [https://traf.gov.in/sites/default/files/Saibal\\_Bhattacharjee\\_12102023.pdf](https://traf.gov.in/sites/default/files/Saibal_Bhattacharjee_12102023.pdf) (6)
44. [https://traf.gov.in/sites/default/files/Tata\\_Play\\_12102023.pdf](https://traf.gov.in/sites/default/files/Tata_Play_12102023.pdf) (15)
45. [https://traf.gov.in/sites/default/files/Culver\\_Max\\_Entertainment\\_12102023.pdf](https://traf.gov.in/sites/default/files/Culver_Max_Entertainment_12102023.pdf) (19)
46. [https://traf.gov.in/sites/default/files/Bharti\\_Telemedia\\_12102023.pdf](https://traf.gov.in/sites/default/files/Bharti_Telemedia_12102023.pdf) (34)
47. [https://traf.gov.in/sites/default/files/Trisha\\_Technologies\\_12102023.pdf](https://traf.gov.in/sites/default/files/Trisha_Technologies_12102023.pdf) (14)
48. [https://traf.gov.in/sites/default/files/BANGUR\\_AMENITIES\\_CENTRE\\_12102023.pdf](https://traf.gov.in/sites/default/files/BANGUR_AMENITIES_CENTRE_12102023.pdf) (15)
49. [https://traf.gov.in/sites/default/files/R\\_K\\_Cable\\_Network\\_12102023.pdf](https://traf.gov.in/sites/default/files/R_K_Cable_Network_12102023.pdf) (6)
50. [https://traf.gov.in/sites/default/files/World\\_Wide\\_Connector\\_12102023.pdf](https://traf.gov.in/sites/default/files/World_Wide_Connector_12102023.pdf) (15)
51. [https://traf.gov.in/sites/default/files/World\\_Wide\\_Connector\\_12102023.pdf](https://traf.gov.in/sites/default/files/World_Wide_Connector_12102023.pdf) (14)
52. [https://traf.gov.in/sites/default/files/SITI\\_Saistar\\_Digital\\_Media\\_12102023.pdf](https://traf.gov.in/sites/default/files/SITI_Saistar_Digital_Media_12102023.pdf) (13)
53. [https://traf.gov.in/sites/default/files/DEN\\_RAJKOT\\_CITY\\_COMMUNICATION\\_12102023.pdf](https://traf.gov.in/sites/default/files/DEN_RAJKOT_CITY_COMMUNICATION_12102023.pdf) (57)
54. [https://traf.gov.in/sites/default/files/DEN\\_MANORANJAN\\_SATELLITE\\_12102023.pdf](https://traf.gov.in/sites/default/files/DEN_MANORANJAN_SATELLITE_12102023.pdf) (56)
55. [https://traf.gov.in/sites/default/files/MAHAVIR\\_DEN\\_ENTERTAINMENT\\_12102023.pdf](https://traf.gov.in/sites/default/files/MAHAVIR_DEN_ENTERTAINMENT_12102023.pdf) (55)
56. [https://traf.gov.in/sites/default/files/MANSION\\_CABLE\\_NETWORK\\_12102023.pdf](https://traf.gov.in/sites/default/files/MANSION_CABLE_NETWORK_12102023.pdf) (54)
57. [https://traf.gov.in/sites/default/files/Den\\_Ambey\\_Cable\\_Networks\\_12102023.pdf](https://traf.gov.in/sites/default/files/Den_Ambey_Cable_Networks_12102023.pdf) (56)
58. [https://traf.gov.in/sites/default/files/DEN\\_ENJOY\\_CABLE\\_NETWORKS\\_12102023.pdf](https://traf.gov.in/sites/default/files/DEN_ENJOY_CABLE_NETWORKS_12102023.pdf) (56)
59. [https://traf.gov.in/sites/default/files/DEN\\_F\\_K\\_CABLE\\_TV\\_NETWORK\\_12102023.pdf](https://traf.gov.in/sites/default/files/DEN_F_K_CABLE_TV_NETWORK_12102023.pdf) (56)
60. [https://traf.gov.in/sites/default/files/Libra\\_Cable\\_Network\\_12102023.pdf](https://traf.gov.in/sites/default/files/Libra_Cable_Network_12102023.pdf) (58)
- \*61. [https://traf.gov.in/sites/default/files/EMINENT\\_CABLE\\_NETWORK\\_12102023.pdf](https://traf.gov.in/sites/default/files/EMINENT_CABLE_NETWORK_12102023.pdf) (55)
- \*62. [https://traf.gov.in/sites/default/files/DEN\\_Premium\\_Multilink\\_Cable\\_Network\\_12102023.pdf](https://traf.gov.in/sites/default/files/DEN_Premium_Multilink_Cable_Network_12102023.pdf) (54)
- \*63. [https://traf.gov.in/sites/default/files/DEN\\_Discovery\\_Digital\\_Networks\\_12102023.pdf](https://traf.gov.in/sites/default/files/DEN_Discovery_Digital_Networks_12102023.pdf) (54)
- \*64. [https://traf.gov.in/sites/default/files/AD\\_ENTERPRISE\\_12102023.pdf](https://traf.gov.in/sites/default/files/AD_ENTERPRISE_12102023.pdf) (6).
- \*65. [https://traf.gov.in/sites/default/files/Ashis\\_Kumar\\_Biswas\\_12102023.pdf](https://traf.gov.in/sites/default/files/Ashis_Kumar_Biswas_12102023.pdf) (6)
- \*66. [https://traf.gov.in/sites/default/files/BRIGHTER\\_TECHNOLOGY\\_12102023.pdf](https://traf.gov.in/sites/default/files/BRIGHTER_TECHNOLOGY_12102023.pdf) (3)
- \*67. [https://traf.gov.in/sites/default/files/Golden\\_Cable\\_Network\\_12102023.pdf](https://traf.gov.in/sites/default/files/Golden_Cable_Network_12102023.pdf) (14)
- \*68. [https://traf.gov.in/sites/default/files/Jeevan\\_Deep\\_Durgapur\\_12102023.pdf](https://traf.gov.in/sites/default/files/Jeevan_Deep_Durgapur_12102023.pdf) (3)
- \*69. [https://traf.gov.in/sites/default/files/Joy\\_Guru\\_Enterprises\\_12102023.pdf](https://traf.gov.in/sites/default/files/Joy_Guru_Enterprises_12102023.pdf) (7)
- \*70. [https://traf.gov.in/sites/default/files/MATHCOLE\\_CABLE\\_TV\\_NETWORK\\_12102023.pdf](https://traf.gov.in/sites/default/files/MATHCOLE_CABLE_TV_NETWORK_12102023.pdf) (6)
- \*71. [https://traf.gov.in/sites/default/files/Mr\\_Chaitali\\_Bhattacharjee\\_12102023.pdf](https://traf.gov.in/sites/default/files/Mr_Chaitali_Bhattacharjee_12102023.pdf) (3)
- \*72. [https://traf.gov.in/sites/default/files/Nikhil\\_ghosalkar\\_12102023.pdf](https://traf.gov.in/sites/default/files/Nikhil_ghosalkar_12102023.pdf) (14)
- \*73. [https://traf.gov.in/sites/default/files/ramen\\_banerjee\\_12102023.pdf](https://traf.gov.in/sites/default/files/ramen_banerjee_12102023.pdf) (6)

R B Sahajpal

nurbaks78@gmail.com

