

Wednesday, 14 October 2015

Mr. Sanjeet Singh,
Advisor (B&CS),
Telecom Regulatory Authority of India,

Subject : Consultation on the draft Telecommunication (Broadcasting and Cable) Services (Fourth)
(Addressable Systems) Tariff (Amendment) Order, 2015

Dear Sir,

In response to the consultation paper issued by TRAI, we would like to reproduce our representations dated 24/02/2014 & 20/08/2014 wherein in the Interest of just and equitable approach we requested the authority to redefine the RIO & RIO rate definition. we are hereby reproducing the abstract of the representations.

“The Authority may in order to protect the interest of the consumer and the service provider and to promote and ensure orderly growth of broadcasting and cable services direct the service provider to modify its Reference interconnect offer”.

We would like to bring to the kind notice of the authority that the markets across the world with just and an equitable approach has a standard clause inserted in the RIO which is as follows:

“The charges being made available in this RIO will be available to all Interconnecting Operators on a non-discriminatory basis. In the event that agreement is reached with any single Operator on new rates for any service covered by this RIO, then those rates will be made available to all Interconnecting Operators.”

But in our market with a prejudicial content providers and a regulator with half baked approach has put this just and equitable approach in garbage bin. The irony is standard RIO published by authority does not even have a clause on non-discrimination of pricing.

In view our above submission we would humbly request TRAI to modify the terms of RIO to include above clause for non-discrimination of pricing, mandating the offering of terms offered to any MSO to all other MSOs, in order to protect the interest of the consumer and the service provider and to promote and ensure orderly growth of broadcasting and cable services.

Looking forward for an urgent attention and early action on our Plea.”

So we strongly oppose the definition of RIO & RIO rate as suggested in the consultation paper which is going to further give broadcasters to continue with discriminatory approach towards the different stakeholders and almost eradicate the smaller players from the market and further compelling them to either shut down the business or become sub franchisee / distributors of the bigger players .

Even the formula suggested will lead to such a discrepancy in pricing that one MSO retail price to end customer of a channel may be much lesser than the wholesale price of another MSO hence leading to chaos on the ground and narrowing the competition on the ground and limiting the choice for end subscribers of service providers.

So we hope the authority will have complete relook on the whole consultation paper and definitions of RIO and RIO rates in particular.

Thanking You.

Yours Truly

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