

COMMENTS ON TRAI CONSULTATION PAPER No 14/2008
On
QUALITY OF SERVICE ISSUES FOR CABLE TV SERVICES
And
FOR DTH SERVICES
By
Umesh Suryawanshi

Overview

The existing package based subscription, compels the subscriber to compromise on his program choices. Individual channel choices are left to the provider's channel package options.

On the other hand, the advantage of the addressable CA systems can be fully utilized to give the subscriber the flexibility to choose his own list of channels (e.g. Star News) (channel based subscription). The CA system capability makes this feasible as individual channel rates are finalized. This capability will also allow the billing facility to be developed or customized at operator premises. In other words, this type of channel based subscription can be controlled using CA systems.

Apart from some basic mandated programs like DD 1, DD News, the subscriber should be allowed to choose his own list of channels. Channel based subscription will give the subscriber the freedom to control his expenses and choose channels of his interest. If such facility is provided, user can subscribe to a costly channel for a limited period only. E.g.: A user subscribes for a One Day Cricket series being aired on channel X. However, handling too many subscription changes can be cumbersome to the operators. So subscription changes can be limited to some number e.g. 3 per month on pro-rata basis. Any additional subscription changes can be either billing cycle based or calendar month based.

For Direct to Home Broadcasting Services:

4.1.5 Whether the DTH operators should be specifically prohibited from dropping of channels from a subscription package for a subscriber for six months from the date of enrolment of that subscriber, if the channel continues to be available on their platform

Subscriber will never select a package based on a single specific channel. He would rather go for some combination. But he may have special interest in some specific channels, so operators should be prohibited from dropping such channels. The best way is to leave the choice to the subscriber along with some basic mandated programs rather than package based options. It may happen that operator may remove costly channels from the list and leaving only limited choice. Now days when you scan through the Cable TV, you will come across mostly news channels.

4.1.6 Within this period of six months, in case the channel ceases to be available on a particular DTH platform, then whether it would be appropriate to have a mechanism of reducing the subscription charges by an amount equal to the wholesale a-la-carte rate of that channel. Alternatively, can you suggest any other methodology for such compensation to the subscriber? Should such compensation be paid/adjusted even when one channel in a package is dropped, and it is replaced/substituted by another channel so that the total number of channels in that package is not affected?

Individual channel based subscription should solve such issues. If such program is not available, subscription charge can be reduced by that amount as if user has unsubscribed that channel. But if such channel is FTA, then it should be replaced by other relevant channel of same category. The subscriber should be notified well in advance for any such changes.

4.1.7 Whether the subscribers should also be required to subscribe to any channel/package for a certain minimum subscription period as in CAS areas. If yes, what should be such minimum subscription period?

Channel based subscription gives more flexibility to the subscriber. If such facility is provided, user can subscribe to a costly channel for a limited period say One Day Cricket series.

But handling too many subscription changes can be cumbersome to the operators. So subscription changes can limit to some number e.g. 3 per month.

Additional subscription changes can be either billing cycles based or calendar month based.

4.1.8 Whether there is any justification for visiting charges for “no signal” complaint by the subscribers? If yes, should there be a ceiling on such visiting charges for complaints of “no signal”?

“No signal” scenario is typically caused by the improper installation or faulty CPE or signal cable damage.

CPE’s can be purchased from retail market (provided that they are interoperable) or operators provide it to subscriber on hire purchase or rent, or say free of cost.

CPE acquired by any means should be treated as a consumer device like say washing machine. Subscriber should be protected for certain initial period from any visit, repair and maintenance charges (6 months-1 year). Otherwise subscriber may be unnecessarily charged even for improper installation or faulty CPE’s provided by operators or manufacturer.

For CPE’s purchased from the retail market, manufacturer should provide the consumer with free service/warranty for a limited period. For operator provided CPE’s, it should be the responsibility of the operators to provide this protection.

In addition, there should not be any visiting charges for “no signal” complaints caused due to changes in the transmission parameters such as direction.

4.1.9 Similarly, should any ceiling be placed in respect of visiting charges for repair and maintenance of CPE for DTH services? Alternatively, should DTH operators be required to offer Annual Maintenance Contracts (AMCs) to their subscribers?

Ceiling can be there for visiting charges after protection period either by operator or manufacturer. AMC should not be offered rather such charges should be need basis. In addition there should be a ceiling for such charges per year. This would protect the subscriber who is constantly facing such issues.

4.1.10 Can you suggest some form of AMCs for DTH Service covering all aspects such as repair & maintenance charges for CPE, visiting charges, attending “no signal” complaints, etc.? 3. Can you suggest some form of AMCs for DTH Service covering all aspects such as repair & maintenance charges for CPE, visiting charges, attending “no signal” complaints, etc.?

This is already suggested through comments for 4.1.8, 4.1.9 and 4.1.10. Subscriber should be protected for certain period (6 months, 1 year) against service, maintenance and after this period their can be any visit or repair charges on need basis and with certain ceiling.

4.1.11 Whether the service providers should be required to make available toll-free numbers for recharge calls for prepaid accounts?

Service provider should provide toll-free number; retail counter or free SMS based facility for recharge or subscription changes similar to mobile services.

4.1.12 Whether the request for suspension of service for full calendar months only should be entertained?

Channel based subscription gives more flexibility to the subscriber. If such facility is provided, user can subscribe to a costly channel for certain period say One Day Cricket series. Subscriber can effectively manage his channel expenses.

But too many subscription changes can be cumbersome to the operators. So subscription changes per month can limit to some number say 3.

Additional subscription changes can be either billing cycles based or calendar month based.

4.1.13 Whether tariff plan or subscription package changes requested by the DTH subscriber should be accepted and implemented immediately or from the start of next billing cycle for DTH subscriber.

In cellular system any package change is provided with immediate effect (within 1-2days). So it should be implemented immediately as per comment 4.1.12.

4.1.14 Whether advance notice of minimum 30 days should be given by DTH operators to a DTH subscriber before terminating his existing tariff plan provided that no tariff plan can be terminated within the contracted period, if any, for that package or within six months of enrolment of that subscriber to that package.

Advance notice of 30 days is enough for termination of any **tariff plan or package**. But in suggested channel based subscription this issue would not surface. But 30 days notice can be provided for termination of any **channel** from DTH service provider and not necessary to put limit of six months.

For Non-CAS Cable Services:

Generalized comments are given for Non-CAS cable services.

Subscription based comments mentioned earlier can be similar to the mentioned DTH services.

Most of the operational parameters and procedures applicable to CAS and DTH services can also be taken for non-CAS areas. But we need to consider some specific issues related to Cable services specially.

Most of the Non-CAS cable services are still analog. So QoS parameters should be considered for both Analog and Digital services.

Unlike DTH, Cable services are distributed to interconnected cable, so major issues faced by cable subscriber is the service unavailability due to cable network breakdown or power failures.

With the digital technologies, service interruption for the individual or group of the subscribers can be identified automatically and related subscribers should not be charged for the duration of interruption.

With analog cable services, it would be difficult to have such auto monitor facility.

Quality of Reception is one of major issues faced by analog cable subscribers. Also existing analog cable services are not addressable.

In digital TV services, quality of reception by individual or group can also be logged, retrieved and monitored independently

Considering the digital TV advantages such as Audio/Video Quality, advanced features(EPG, VOD, PVR etc), effective spectrum utilization, effective monitoring and subscription capabilities, there is need to consider the digital switchover for non-CAS area as well.