

To
TRAI

15th November 2016

Dear Sir/Madam

Ref : comments on the draft Telecommunication (Broadcasting and Cable Services) Interconnection (Eighth) (Addressable Systems) Regulations, 2016

We appreciate the effort taken by TRAI in publishing the draft Interconnection Regulations afresh based on developments over the years and the initiative to invite comments from stake holders before notifying the same.

We as an MSO, operating a distribution platform for TV Services have following observations, suggestions, requests basis our study of the draft Tariff order.

1. It is not fair to limit the carriage fee to 20 p per channel per subscriber as the cost of carrying a channel is much larger. There should be larger range with a maximum and minimum rates. This is an important component of a distribution platform and if this is reduced it will impact them negatively.
2. Shopping channels should not be covered in any such limitation because for a distribution platform they are like advertisers and the price for the same should be left open based on local factors between the Platform and the Shopping channel broadcaster.
3. As per clause 11 it is not fair to a distribution platform to transmit channels on first come first serve basis rather it should be left to the platform and the broadcaster based on the market requirement and dynamics. If a particular channel has placed request but does not seem to appeal to local Populace it is not fair to push the same.
4. LCN Position should be the prerogative of the Distribution platform.
5. There should be more flexibility provided in the LCO/MSO interconnect agreement specially in terms of roles and responsibilities.
6. MSO should be provided for a period of 3-5 years a better revenue share from Broadcasters compared to DTH industry and there are multiple stakeholders and also the suggestion of charging additional infrastructure cost per 25 channels may not work.

For e-Infrastructure and Entertainment (India) Pvt. Ltd

Manoj Kumar Agarwal
President