

**Subject:** THE TELECOMMUNICATION (BROADCASTING AND CABLE ) SERVICES  
( FOURTH )(ADDRESSABLE SYSTEMS ) TARIFF (SECOND AMENDMENT) ORDER,2013

Dear Mr Wasi Ahmad,Advisor (B & CS ), TRAI,  
Mahanagar Doorsanchar Bhawan,  
Jawahar Lal Nehru Marg,NEW DELHI-110002,

On the above subject our comments/suggestion are as under :--

1.(1)& (2) ok,

2. (a) the word "pay "shall be deleted.,

2 (b) in sub-clause (1) :--PARA 6 sub-para (1) second proviso shall be substituted as proposed.

Sub -para (a) ..... "not exceeding two times ".....shall be modified as ...." not exceeding 50 % "...in the interest of customers as well as keeping in view any principle of trading/marketing --retailer /end customer pricing.2times does not appear logical & rational.

Sub -para ( b).... " a bouquet shall not exceed three times " shall be modified as " a bouquet shall not exceed 100% "...

in sub-clause (2) the word "pay " shall be deleted as proposed.

(4) kindly add in first para as under :---

For add-on devices /CPEs such as more than one TV ,PC,etc. annual value of bouquet shall not exceed 25 % of basic bouquet of any systems /technology .It shall be indecent of nature of technique/technology such as HDTV,3D etc.

**PART IV OFFERING OF CUSTOMER PREMISES EQUIPMENT**

**PARA 7. Sub-para (b) (ii)**

Most of the DTH,HITs, LCOs offer the services with CPEs on turn key basis which includes the following :--

(i) Installation of CPEs ( excluding customer devices like TV sets ,PCs etc ).The broadcasters/their agents charges which are astronomically very high .For example with INR 2900/00 cost DTH receiver cost of installation of Rs 1000/ & one year maintenance.Such cost shall not be more than Rs300/ at the best.It is exploitation of customers.PREFERABLY INSTALLATION & AMC SHALL BE FREE OF ANY CHARGE. Under both the schemes i.e.Hire Purchase or Rental Scheme

(ii) Both schemes shall be mandated to be offered to all customers without any discrimination and published by all service providers.

(iii) Sub para (b) information shall be mandated to be published and part of agreement with customers to curb any wrong tendencies /doings /fraudulent, at field level staff in the interest of customers and as to make them aware for such provisions .

**PART VI ... MISCELLANEOUS**

It is observed that number of Broad casters,programme distributors /LCOs/DTH service providers withdraw few or some channels without informing customers on various accounts --technological up gradation (from normal to HDTV ), Reshuffling of Bouquet ,etc. and no benefits are passed to customers for such withdrawals/ dropping of channels etc.on prorated-basis or otherwise.. For such changes service providers shall be directed by TRAI by order to timely intimate customers about such changes & benefits accruing to them.

All tariffs shall be based on cost-economics i.e.IRR and shall be

examined either by TRAI or PUBLIC through OHD consultations on tariffs for broadcasting services based on general principles of whole-sale,retailers hip and end-distribution etc..No principle of FOR BEARANCE shall be applied in our environment.or other wise best practices of some other countries may be looked including their complete process of forbearance ..proposals ,their examination by specialist group in TRAI,followed by public notification , & public consultation and final view of TRAI for recommending to concerned Ministry/ Minister I/C of the Subject matter.

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