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09 January 2009

The Chairman  
Telecom Regulatory Authority of India  
New Delhi-110001

**Sub: Comments on Consultation Paper on Quality of Service issues for Cable TV Services in Non-CAS Areas and for DTH Services**

Dear Sir,

Reference your Co Consultation Paper on Quality of Service issues for Cable TV Services in Non-CAS Areas and for DTH Services dated December 01, 2008.

Our comments on the subject are forwarded herewith.

**For Non-CAS Cable Services**

**Para 4.1.1. Please offer your comments on the areas and parameters of Quality of Service which need to be covered in such regulations (refer para 2.16)? Please offer comments whether QoS parameters should also be made applicable to voluntary CAS networks in non-CAS areas. If yes, then please indicate what should these parameters be.**

**Comments**

**Use of Standard Cable TV Equipment.** Although BIS had finalised technical standards for cabled distribution of television signals in 1996, yet no ISI marked equipment is available in India so far. Even if the equipment manufactured by the indigenous manufacturers comply with the standards, there is no way of certifying it as the BIS had shown their inability to do so due to non availability of adequate laboratories in India.

We would like to bring to the kind attention that the equipment manufactured in India is either assembled or made from imported components which comply to international standards. Thus the LCO's use standard equipment but there are other factors affecting delivery of standard signal to the subscribers. As the Authority has mentioned in Para 2.4 of the Consultation Paper, use of standard equipment may not suffice the necessary QOS as the delivery of the signal is dependant upon the following three factors :

**(a) The Feed to LCO from MSO**

The feed LCO gets from the MSO is sometimes disturbed intentionally so that the LCO can be compelled to pay higher declaration to the MSO or is forced to sell out the MSO. It is a

known fact that the signal as it progresses on the cable network, cannot be improved but can be maintained only for a certain distance. So it is very important that the feed which the LCO gets from the MSO is of quality nature otherwise the basic purpose of the feed is defeated.

### **(b) The Network of the LCOs**

Since the network of the LCOs are the lifeline of the cable networks, all LCOs try to maintain them to the best of their capability. In certain cases due to the rights of the electric poles for fixing cables are so expensive that they are out of reach of ordinary LCO. Thus the cables are laid on trees or house balconies etc and become prone to damages by unscrupulous subscribers and weather conditions. It is therefore requested that Right of Way to the LCOs should be given at a concessional rate so that the network quality is maintained.

### **(c) The Internal Wiring of the Consumers**

Consumers today either have internal wiring in their houses done by ordinary electricians or tap the signals to the multiple television sets they have got in their houses. Electricians make twisted joints in co-axial cables which also deteriorates the signal quality as the joints tend to pick up signals which cause interferences. Even the co-axial cables used for internal wiring are the cheapest, non-standard cables available, not fit to carry all frequencies. Therefore there is a need to have strict laws to curb tampering of CATV cables and illegal connections. Regulatory guidelines must ensure that customers pay for all the connections they enjoy after getting them installed properly by the LCO.

**Para 4.1.2. In particular, comments and suggestions are invited for effective and transparent monitoring and implementation of proper billing, to protect consumers' interests.**

#### **Comments**

Individual Billing and service related complaints can be effectively dealt with by the Consumer Forums as is being done now. However, the authorized officers may be given the powers to monitor these services and take action where needed.

#### **Billing, Collection & Contact Point with Subscribers**

Since the LCOs operate over a small area they maintain a personal contact with all of their customers which ensures that a collection man goes every month to every house taking the amount due. Even a receipt is given. It is interesting to note here that no cable operator ever charges a delayed payment surcharge inspite of making numerous visits to a customer for payment. The Authority should consider authorizing the LCO to charge delayed payment surcharge. In analogue regime unless a customer is a regular defaulter or really harasses the collection boys no disconnection normally occurs. Similarly the process for providing new connection and transfer of a connection within the locality of the cable operator is made in less than a day lest another LCO lures the customer. No shifting charges are asked.

We wish to bring to your notice that there has been a constant demand from the authority that if a customer wishes to temporarily deactivate his signal in Non-CAS market then he should be given a rebate. Such a rebate is beyond the LCOs as a Broadcaster/MSO does not recognize the reduction given by the LCO to the consumer and want their amount in full. Hence no QoS on the billing front can work unless the same is applied to all stakeholders ie.

Broadcasters, MSOs, LCOs and subscribers.

It has been seen that certain Broadcasters change their bouquets and move from one distributor to another which ultimately impacts the pricing of the channels and the consumer is not willing to pay that extra amount. The cable operator is left with no other choice than to either disconnect him or get himself disconnected by his MSO or the Broadcaster. The Authority should ensure that channels which move from one distributor to another do not increase their A-La-Carte price or bouquet price.

**Para 4.1.3. There is an expectation that the State Governments and the Ministry of Information & Broadcasting will extend necessary cooperation in the effective implementation of QoS Regulations. Can you suggest any other supplemental measures for further strengthening the implementation of QOS Regulations?**

#### **Comments**

There is a need to monitor and ensure compliance to technical standards where applicable. However, whereas the non-technical standards can be monitored by the authorized officers in each state, we need a technical body to monitor the technical standards. In the absence of any such body at present, cable operators and the MSOs can be made to give an annual certificate of their compliance to all the QoS regulations including technical standards at the time of renewal of their annual registration/licence.

#### **Monitoring of Quality of Service Standards**

Making third parties to monitor QOS parameters may breed further bureaucracy and red tapism. It is suggested that a very simple self certification should suffice the requirement. However some practical solutions are given below.

**Voluntary CAS Networks using digital equipment** can be asked to comply with the technical standards as set for the CAS areas.

**Parameters of Quality of Service** related to technical standards as applicable to CAS areas can be made applicable to all addressable networks, whether in CAS or Non CAS areas. Billing and service related parameters can also be made applicable to all the networks taking in to account what has been suggested in the above paras.

**Monitoring of technical standards** can also be entrusted with the local ITI s where lab facilities already exist and technical staff is also available. Infact, these ITI s can serve a dual purpose; they can run technical courses in digital cable technology and broadband as well as act as technical standard monitoring organizations. These ITI s can even submit their report to the authorized officers in the districts. The staff in these ITI s can be trained by the local Doordarshan engineers.

**Para 4.1.4 Please offer your view on any other issues which will make the Regulations more complete and effective.**

#### **Comments**

Quality of Service standards although desired, can not be implemented in practice unless the

whole chain of providing a service follows some kind of standards. Notwithstanding the above, the customer is the best judge of quality of service and a healthy competition the best catalyst for the stake holders to do so. Empowering the customer and providing a level playing field to all stake holders will ensure the QoS standards being maintained by one and all.

Yours Sincerely,

(Roop Sharma)  
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