

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



**Comments on
Draft (Second Amendment)
to
The Telecommunication (Broadcasting and Cable) Services Standards of
Quality of Service and Consumer Protection (Addressable Systems)
Regulations 2017**

Comments :

After notifying the “ New Regulation Framework “ for Broadcasting and Cable services, Consumers are not able to make real choice of TV channels even after several efforts. We found that :

1. The process of selecting TV channels on various DPOs platform is cumbersome.
2. The process of subsequent change in the existing subscription is even more tedious.
3. The basic information like details of existing TV Channels subscription is also not available to the consumer.

4. DPO has no interest to provide consumer friendly options to consumers as easy channel selection option clashes with their own vested interest.
5. DPOs want to impose their preferred pack/bouquet to the subscribers without providing easy options as envisaged by the Authority.
6. DPOs interest is to maximize their revenue.

Lack of proper addressability is a major concern. The core issue here is consumer choice. Greater and easier choice will provide the consumer with more control over content and correspondingly will give the consumer better control over the price that he/she is charged.

We strongly feel that, if we enhance the flexibility permitting a consumer to exercise his choice, the objective of affordable TV services for the consumers can be met. This implies that affordability will come if a consumer is able to decide what his total bill should be through the method of selection of channels.

A Key Requirement for TV channel selection system is to :

1. Provide a solution that can work throughout the country.
2. Be accessible by every customer of Broadcasting and cable service sector.
3. Evolving the simple and robust solution, which should be stable, scalable and secure.

In order to address these issues, the steps taken by the Authority to have a channel selection system developed by the third party will be highly effective. We feel that this will resolve the key issues of consumers being unable to make their choice. While functioning across cable and DTH providers, the APP will help,

subscribers have more control on their channel selection with ease, and could thus lead to lower charges in monthly subscription plans.

The Third Party APP will aid consumers in easily selecting the TV channels that they want to watch. Creation of channel selection system API specification document, which prescribes common APIs with all Distribution platform operators will definitely help to the consumers in easy selection of the required TV channels. This is a tremendous work taken by TRAI for the benefit of consumers to ensure proper implementation of the new framework.

Following points should be kept in mind :

1. The APP should help consumers to optimize the selection of their choice and also inform the consumers about the MRP.
2. Consumer should select or deselect channels as per their wish.
3. There should be provision to download or take a print out of the channel selection along with optimized price of TV selection.
4. They should maintain an enhanced user experience.
5. The API service provider should be audited thoroughly and consistently, ensuring service quality and shortening the API selection process.

Problem and Risk with Third party APIs :

The use of third party APIs does introduce risks and challenges like :

1. Information security
2. Stability

3. Performance
4. Micro innovation

We strongly support the Draft Regulation (Second Amendment) to address the issues of consumers not able to make real choice of TV channels conveniently on the web portal/APPS of the DPOs as :

- 1. This will more effectively offer assistance to the consumers in choosing their want TV channel according to the new tariff regime.**
- 2. This will allow consumers securely communicate with the DPOs through APPs and Portals.**
- 3. The IT Application will also facilitate consumers to choose channels/bouquets of their interest among the offering by their respective DPOs.**
- 4. The APP can also suggest an optimal configuration of bouquets based on channels desired by the subscriber to reduce the total monthly bill.**

Thanks.

Yours faithfully,

(Dr. Kashyapnath)
Prsident