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Date: Sat, 24 Aug 2013 22:15:08 +0530
Subject: Reference to Consultation paper no. 8/2013
To: traicable <traicable@yahoo.co.in>
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Date: 24/08/2013
Place: PATNA

To,
Mr. Wasi Ahmad
Advisor (B & CS) ,
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi-110002
Tel: 011- 23237922

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Dear Sir,

Comments from Darsh Digital Network Pvt.ltd., Patna, pertaining to consultation paper on distribution of TV channels from Broadcaster to platform operators .

The distribution business of Pay TV market presently controls by top 4 major aggregators , these aggregators incorporate all the major popular and maximum no. of pay TV channels.

Further study of the ground of pay TV channels , these aggregators ownership structure reveals that the broadcasters whose channels they distribute own or control these entities has cross holding ownership platform in the aggregators. These reflects the ill effects of vertical integration and misuse of dominant position as Cable Tv Services industry is content driven pull. But these aggregators having substantial negotiation power often misuse and led to several market distortion.

However the pattern observed in the market that the entry of Broadcasting companies into a business of aggregation by forming joint venture companies, the major broadcasters whose channels are being distributed by such companies controls these aggregators and so they are the direct beneficiary of the aggregation.

Here comes one doubts in the mind 'Why broadcasters want to act as a aggregator too', by these formula of compulsion promote the big business MSO's who are national pan player or regional player who are some how vertically integrated or cross ownership holding discourage

the local and small independent MSO's to get up and hindering to become bigger by all such means of activities.

Thus the offer and model of business help their own cross ownership holding company in promoting as compare to small independent local MSO's in the competitive environment by offering higher cost per subscriber . Thus promoting to kill the competitors & competition in the Market.

In the era of Analog mode of business the concept of marketing was 'SELLERS' driven but in the DAS era will be 'BUYERS' driven by having purchasing power decision directly with subscribers to choose their favorite channels of their own choice as per their need and subscribe according to that. Even in this situation their will be no need of Cross ownership because content will play their own role to drive the individual channels rather than choose the route of aggregators through cross ownership holding.

Therefore our view is that there should not be Cross media ownership holding in pay TV distribution aggregators hence we are strongly opposing the cross holding aggregation concept for smooth and transparent Cable TV distribution roll over where content will play their own roll.

Thanking you

With Regards

For : DARSH DIGITAL NETWORK PVT LTD.