



DIGITAL CABLE OPERATOR ASSOCIATION MUMBAI

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Prof. Kasim
Advisor (B&CS) – II
TRAI
New Delhi

Dear Professor,

We enclose herewith our comments on the Draft QoS & Consumer Protection (DAS) Regulations 2016.

Procedure for connection

Pt 6 permits a Distributor of TV Channels (DOTC) to charge an amount not exceeding Rs.350/- as an one time installation charge. We presume this does not include the cost of cable and materials consumed within the home which can vary from household to household. We wish that the same be amply clarified.

Billing and payments

In the case of delayed payment by post paid subscribers we feel it is better if a Fixed Late Payment fee of Rs.25/- per month (inclgd Taxes) as charged by other utilities is charged rather than a percentage.

Entire DTH industry is following pre paid billing and cable has started adapting to this. Recently Hathway has rolled out its portal for LCOs and the same is working fairly well and the MSO no longer has to follow up on collection from LCOs. The MSO & LCO have agreed upon their internal revenue sharing formula and the MSO is assured of its share of revenue 100% for all activated STBs. It is the LCO who now bears the brunt of collection from subscribers, activating STBs, attending to STB related problems, giving discounts for ROW/competitive LCOs/MSOs and risking payment default from subscribers.

In prepaid scenario there is hardly any dispute on billing and if required the detailed SOA can be provided to any subscriber at any time for the previous six months. This has worked well with DTH till now and even with us. However mandating that every subscriber be provided itemised details each month is an unnecessary task which is not even being demanded by every subscriber. If it means simply informing the subscriber of the monthly amount billed and deducted from his prepaid balance, the same is possible to be sent in electronic form. However itemised channels/packages selected will be many under the new Tariff Regulations due to the options of choice available and the same cannot be sent as a SMS to the subscriber but indirectly forces all to provide an invoice. Itemised usage is a telecom terminology and concept which a one way service like DTH & cable cannot provide.

For LCOs who wish to retain their identity and follow the QoS norms in their networks, it should be made mandatory for MSOs to offer APIs of their SMS with the billing software companies that LCOs have purchased.

Customer Premise Equipment

The Regulation proposes only 2 methods of supplying STBs – outright and rental scheme. The current practice is to charge an one time activation fee which is regarded as income for DOTC. Can this practice continue ?

The DTH industry is permitted to charge Rs.150/- as visiting charge for subscriber residence visits. The monthly subscription charges levied by Cable & DTH are hardly any different now. Today we are facing more complaints related to STBs than ever before and have hired more staff to attend to such complaints. The daily complaints that we attend to are mainly related to STB issues. Our staff has to visit the subscribers not once, but twice over to replace and provide a standby STB. Then we are to deposit it at the MSO office for repairs and collect the same again after few days and retrieve the standby STB installed. Many subscriber's are even refusing to pay the repair charges at cost charged by the MSO (receipt given to subscriber) and we end up bearing the same after warning such subscriber's that next time they will have to visit the MSO office and get this done on their own.

The MSO says they have come up with a policy whereby many repair centres have been opened but they refuse to handover the list to any of us. Also there is a single fixed charge per STB that the MSO charges irrespective of the defect. The tariff for repair of HD is 2 times the SD STB repair. There is no break up provided of materials used and labour charges either.

Our point is if DTH can charge 150/- for visit charges, the same should be permitted with cable. However we would be permitted to charge if

more than 2 visits per month per home are exceeded. And we should be allowed to recover the STB handling/transport charges from the MSO.

Display of channels in the EPG

Since each State is a different geographic area and each geographic area can theoretically have different MRPs, the only way DTH/National MSOs can implement is if they follow the CAS Bouquets methodology and assign the same to STBs as per their States which will involve modifications in their CAS and SMS systems.

Thanking you

For DCOAM

A handwritten signature in blue ink that reads "J. Mayekar" with the date "15/11/16" written below it.

Authorised Signatory