

**Comment(s) by Hathway Cable & Datacom Limited, to the proposed amendments given in the draft Standards of Quality of Service (Digital Addressable Cable TV Systems) (Amendment) Regulations, 2014:**

**1. Regulation 1 (2) : They shall come into force thirty days from the date of publication in the official Gazette**

The implementation time of 30 days from the publication in the official gazette under regulation 1 (2) given under the amendment is too short. The implementation of the electronic pre-paid mechanism wherein the amount paid by the subscriber is adjusted automatically for the services availed by him, which Trai has proposed in this amendment would not only require fresh investment by the MSO's but would also require time for its development, testing and then implementation.

Hence we propose that the amendment should come into effect atleast 6 months from the date of publication of the same in the Gazette.

**2. Regulation 15 - Issue of Bills and Receipts to Subscriber and entry of detail of receipt in subscriber account in MSO's SMS system**

The onus on providing bills and receipts to customers should be squarely placed on one of the entity (either the MSO or the LCO), which raises the invoice on customers and collects money from customers. Presently we are billing the LCO who in turn is billing the subscriber. We are generating subscriber bills on behalf of the LCO and handing it over to the LCO.

Therefore sending bill to consumers and issuing receipt to the customer should be the sole responsibility of the LCO.

### **3. Regulation 16 A – Consequence of contravention of provision of regulation 15 or regulation 16**

Financial disincentives are very onerous. Amount of disincentives are very high, and the logic behind penalising both LCO & MSO, in case of an agreement between the two, is a very oppressive to MSOs. Further, penalizing the MSO alone in the case of absence of any agreement between the MSO and the LCO is unfair to MSOs.

Thus financial disincentive may not be able to resolve the issue and may further lead to acrimony between MSOs & LCOs, accordingly Trai should have a relook on this regulation.