Date: June 06, 2022

To,

Shri Anil Kumar Bharadwaj,
Advisor (B&CS)-II,
Telecom Regulatory Authority of India (TRAI),
Mahanagar Door Sanchar Bhawan,
J.L. Nehru Marg (Old Minto Road),
New Delhi-110002

Ref: Consultation Paper bearing No. 05/2022 dated 07.05.2022 on Issues related to New Regulatory Framework for Broadcasting and Cable services (Consultation Paper)

Subject: Response of Hathway Digital Limited (Hathway) to the Consultation Paper

Dear Sir,

We write in reference to the captioned Consultation Paper issued by Telecom Regulatory Authority of India (TRAI) on issues related to New Regulatory Framework for Broadcasting and Cable services.

We thank TRAI for taking up the issues pertaining to implementation of New Regulatory Framework for Broadcasting and Cable Services and giving us the opportunity to present our views in relation to the same.

In furtherance thereof, before foraying into the queries raised by TRAI, we would like to bring forth various challenges/difficulties being/to be faced by Multi System Operators (MSOs) specifically owing to implementation of New NTO 2.0. The same are as follows:

A. Background:

1. TRAI may note that the subscriber base of Direct to Home Operators (DTH) as well as Multi System Operators (MSOs) has been gradually and drastically shrinking in the recent times. According to TRAI's own data, in a period of less than 24 months (approx.), the total active subscriber base of DTH has come down from 70.99 million subscribers to 68.89 subscribers. Likewise, the total active subscriber base of MSO/HITs having more than 1 million subscribers, have reduced from 47.58 million subscribers to 45.55 million subscribers.

2. TRAI may take note that the situation is quite grim and annihilating for the broadcasting and cable sector barring big Broadcasters. The said big Broadcasters are already present in the alternative space of OTT services and any impact due to reduction in subscriber base/shrinking market size of cable tv platform is being well-balanced by their presence in

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the said alternative space of OTT/online market. It is pertinent to mention that the MSOs, DTH and Local Cable Operators (LCOs) employs more than 10 lakhs peoples whose livelihood are at stake due to the aforementioned reduction/depreciation in subscriber base.

3. TRAI may take note that there is reduction/churn of 2.5% per month in subscriber base of MSO, and any further increase in prices of the channels/cost of cable service will prove devastating for the cable sector.

B. <u>Same Service, Same Rules – Linear TV vs OTT Platform services:</u>

4. The Policy Guidelines for Downlinking of Television Channels (hereinafter "**Downlinking Guidelines**") published by the Ministry of Information and Broadcasting (MIB), Government of India on 05 December 2011 lays down a procedure, details of do and don't's for grant of permission for downlinking a channel in India. One of the Guidelines outlined by the MIB requisite for entities permitted to downlink channel in India is mentioned below:

   As per Clause 5.6 of the Downlinking Guidelines, "*The applicant company shall provide Satellite TV Channel signal reception decoders only to MSOs/Cable Operators registered under the Cable Television Networks (Regulation) Act 1995 or to a DTH operator registered under the DTH guidelines issued by Government of India or to an Internet Protocol Television (IPTV) Service Provider duly permitted under their existing Telecom License or authorized by Department of Telecommunications or to a HITS operator duly permitted under the policy guidelines for HITS operators issued by Ministry of Information and Broadcasting, Government of India to provide such service.*"

5. The aforementioned guideline evidently mandates the provision of satellite channel(s) to the MSOs/Cable Operators registered under the Cable Television Networks (Regulation) Act 1995 or to a DTH operator registered under the DTH guidelines issued by Government of India or to an Internet Protocol Television (IPTV) Service Provider duly permitted under their existing Telecom License or authorized by Department of Telecommunications or to a HITS operator duly permitted under the policy guidelines for HITS operators issued by Ministry of Information and Broadcasting, Government of India to provide such service. However, many Broadcaster through their own and/or third party owned OTT are making the satellite channels available to the subscribers which should strictly be prohibited being the apparent violation of downlinking guidelines.

6. The provision of linear or non-linear signal of the same content as available on cable tv platform, in violation of the downlinking guidelines as available on cable tv platform, is making the unregulated OTT service, a substitutable and competing service, thereby making the cable tv service more unsustainable.

7. TRAI may take note that there is also a huge disparity in pricing and presentation between OTT and cable tv sector. Since there is no regulated pricing regime in OTT as in cable tv sector, the cost of subscription of average OTT platforms is much lesser in comparison to

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cable tv sector wherein the paid content is also provided advertisement free to the subscriber.

8. TRAI should appreciate that without bridging the regulatory/ pricing gap/disparity between the OTT and cable operators, the issue of reduction in subscriber base of cable tv sector cannot be addressed. Further, ensuring the strict compliance of the downlinking guidelines by the Broadcaster is also need of the hour which will emphatically change the approach of Broadcasters towards the cable tv platform and will create a level playing field for the MSOs.

C. <u>Exponential increase in prices of driver channels:</u>

9. It is evident from the Reference Interconnect Offer (RIO) published by the Broadcasters pursuant to introduction of NTO 2.0 that almost all the Broadcasters have increased the prices of their popular/driver channel exponentially by 30% to 60%, thereby resulting in the exclusion of such channels from the bouquets as NTO 2.0 has capped the price of channel to be included in bouquet at Rs. 12/-

10. We are detailing the comparison of MRP of SD variants of certain popular/driver channels for the ready reference of TRAI as under:

S. No	Name of the channel	Genre	SD /HD	Pre NTO 1 (A)	NTO 1 (B)	NTO 2 (C)
1	Star Plus	GEC	SD	7.87	19.00	23.00
2	Zee TV	GEC	SD	5.83	19.00	22.00
3	Colors	GEC	SD	8.99	19.00	21.00
4	Sony Entertainment Channel(SET)	GEC	SD	8.99	19.00	24.00
5	ETV	GEC	SD	4.49	17.00	22.00
6	SUN TV	GEC	SD	5.25	19.00	19.00
7	Asianet	GEC	SD	5.23	19.00	22.00
8	Maa TV	GEC	SD	5.25	19.00	22.00
9	Vijay TV (Star Vijay)	GEC	SD	1.80	17.00	19.00

11. A further analysis of data mentioned under Column B of the aforementioned table would also reveal that the MRP of popular/driver channels of premier broadcasters have increased manifolds i.e. between 200- 400% in a short span of around two years, i.e. from 2019 to 2021, which increased by 150-200% during the implementation of NTO 1.0/Principal Regulation in 2019, further increased by 20-30% in 2021 and consequently, subscribers have to shell out approximately 200% -400% of additional cost on the MRP of channels since 2019.

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12. In reference to the aforementioned analysis, it is pertinent to mention that while the revenue growth of the MSOs have been restricted by making it subject to micromanagement and the stringent regulated pricing regime/revenue streams, the Broadcasters have not only continued with the exploitation of their liberty by increasing the prices of their channels as per their whims and fancies and on the other hand the DPOs have been micromanaged and over regulated on all their revenues resulting in losses for them..

13. TRAI It may be noted that, such pervasive pricing model adopted by the Broadcasters will lead to a further erosion of the subscriber base, which was quite evident during the implementation of the New Regulatory Framework in 2019. This evidently establishes that such broadcasters are the only stakeholder that are benefitting from the entire revenue chain, and they are guided with the objective of increasing their revenues, even at the cost of the consumers.

14. TRAI may appreciate that the reduction in television bills of the subscriber was one of the principal motive behind the enactment of NTO 2.0. However, the pricing of channels declared by the Broadcasters has defeated the very purpose of the NTO 2.0 and the same will further push the already disgruntled subscribers away from the cable tv platform.

15. The increase in the prices of driver/popular channels will inflate the monthly television bills of subscribers by Rs.60/-to Rs.100/- owing to the reason that the premiere channels have been kept outside the purview of the Broadcasters' formed bouquets due to its pricing and in the event, a subscriber still want to have access to all such premiere channels, it will have to spend extra money for availing the same services/channels. It is stated before the Authority that for instance, presently, a subscriber who has subscribed to the bouquets of:

    i. Star India Private Limited (Hindi Value comprising of two of its premiere channels Star Plus and Star Sports1) – Rs. 49
    ii. TV18 Broadcast Limited (Hindi Budget comprising of its premiere channel 'Colors') – Rs. 22
    iii. Zee Entertainment Enterprises Limited (Zee Family Pack SD comprising of its premiere channel 'Zee TV') - Rs. 39
    iv. Sony Pictures India Private Limited (Happy India 31 with its premiere channel 'SET') - Rs. 31

    Pays an amount of Rs. 49+22+39+31, i.e., an amount of Rs. 141/- (towards the price of the respective bouquets in the aforesaid order) + Rs. 130/- (towards the NCF). i.e., a cumulative amount of Rs.271/- towards cable television services.

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16. Whereas pursuant to the implementation of NTO 2.0, any subscriber who wishes to avail and enjoy similar cable television services as was being availed by him till now, will get the bouquets of:

    i. TV18 Broadcast Limited in the name of 'Colors Family Hindi Pack' (priced at Rs.12.80/-) along with its premiere channel Colors (priced at Rs.21/-);
    ii. Star India Private Limited in the name of 'SVP Lite Hindi' (priced at Rs. 25/-) along with its premiere channel Star Plus(priced at Rs.25/-) and Star Sports I (priced at Rs.23/-)
    iii. Sony Pictures India Private Limited in the name of 'Happy India Hindi Blockbuster' (priced at Rs. 24/-) together with its premiere channel 'SET' (priced at Rs. 24/-) and
    iv. Zee Entertainment Enterprises Limited in the name of 'Zee Family Pack' (priced at Rs.27/-)together with its premiere channel Zee TV (priced at Rs.22/-

    Pays an amount of Rs.203.80/- instead of Rs.141/-towards the MRP of channels and bouquets of pay channels and a cumulative amount of Rs.333.80/-{MRP of channels and bouquets of pay channels + NCF of Rs.130/-)

17. It is pertinent to mention that all the major Broadcasters also own their OTT platforms wherein the same content is being provided at a much cheaper rate in comparison to cable tv platform. Hence, to create a level playing field and to save the cable tv industry from diminishing further, **a cap of INR 12 on MRP of any channel is required to be introduced by TRAI.**

18. Despite the amended Regulations in 2020 limiting the 15% discount only for the a la carte channels but not for the bouquets, the RIO published by some broadcasters have linked the 15% discount based on the minimum penetration of the driver a la carte channels along with the bouquet of non-prominent channels, in order to push them on to subscriber and increase the subscriber costs.

D. <u>Response to queries raised in consultation paper</u>

Q1. Should TRAI continue to prescribe a ceiling price of a channel for inclusion in a bouquet?

a. If yes, please provide the MRP of a television channel as a ceiling for inclusion in a bouquet. Please provide details of calculations and methodology followed to derive such ceiling price.

b. If no, what strategy should be adopted to ensure the transparency of prices for a consumer and safeguard the interest of consumer from perverse pricing?
Please provide detailed reasoning/ justifications for your comment(s).

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Hathway's Response:

i. As discussed, above, it is reiterated that the Broadcasters have clearly exploited the price model of TRAI thereby fixing the MRP of its driver channels such as to avoid its inclusion in any bouquet thereby leading to substantial increase in the subscriber cost.

ii. Therefore, in order to safeguard the subscribers from perverse pricing and ensure parity of prices, the correct strategy would be to cap the overall price of any channel MRP at INR 12/-only.

iii. The channel pricing before implementation of NTO (refer page 73 of TRAI consultation paper dated 16th Aug 2019), wherein maximum price of SD channels were marked at Rs. 9 per channel and below that, post that if we add inflation of last 3-4 years, at a CAGR of 7%, the channel price shall not exceed Rs. 12 in any case.

iv. It is pertinent to mention that the cable tv services is for the subscriber and because of the subscribers. Hence, while enacting any implementing any regulation or pricing regime, the interest of subscriber must be the principal concern and accordingly, the price/cap of INR 12/- per channel will ensure affordability and access to content to all consumers. It may be noted that since the major Broadcasters have their own OTT platform and they do not have any concern or incentive to price channels as per the requirement of the customers to ensure affordability, competitiveness and protection of the customer base for Cable TV industry.

v. In addition to above with respect to regulating advertisement time on pay channels, we would also request Authority to introduce Ad-Cap wherein there should be cap of maximum permissible time for advertisement during an hour i.e. 60 minutes ("**Ad-Cap**"), based on the aforesaid price range/band(s). Accordingly, we suggest an Ad-Cap as is stated in the table below:

Sr. No.	**Band(s) for the purpose of Ad-Cap**	**Lower Range of MRP (In Rs)**	**Upper Range of MRP (In Rs)**	**Ad-Cap per 60 Minutes**
1	Band 1	0.01	1.00	12
2	Band 2	1.00	4.00	9
3	Band 3	4.01	8.00	6
4	Band 4	9.01	12.00	3

vi. TRAI may take note that as per the data quoted by TRAI in the consultation paper itself, Broadcaster earns revenue not only from subscription but also from advertisements. The advertisement revenue is humongous, as the Broadcasters are showing advertisements for up to 20% of the viewership time. There is a requirement for Ad-Cap as the customer who is already paying for the channel is still subjected to

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advertisement when accessing the content on DPOs platforms. However, content is provided ad-free on OTT platform.

Q2. What steps should be taken to ensure that popular television channels remain accessible to the large segment of viewers. Should there be a ceiling on the MRP of pay channels? Please provide your answer with full justifications/reasons.

Hathway's Response:

i. The pricing freedom has been deliberately exploited by the Broadcasters thereby pricing the driver channels at exorbitant and irrationally high price, consequently making the content beyond the reach of a consumer.

ii. The channels, irrespective of its popularity should be capped at Rs. 12 to make it affordable and keep it within the reach of a consumer.

iii. If the price of the driver channels is not capped, customers who are accustomed to such driver channels will have to shell out more money to get access to such driver channels.

iv. As suggested above, the 15% discount should be merged with distribution fee so that pure subscriber choice alone determines the off take of the channel rather than push/inducement to increase the channel off take to earn 15% discount. Such an amendment will lead to true price discovery of the channel /bouquet based on subscriber choice.

Q3. Should there be ceiling on the discount on sum of a-la-carte prices of channels forming part of bouquets while fixing MRP of bouquets by broadcasters? If so, what should be appropriate methodology to work out the permissible ceiling on discount? What should be value of such ceiling? Please provide your comments with justifications.

Hathway's Response:

i. Yes, there should be ceiling on the discount on sum of a-la-carte prices of channels forming part of bouquets while fixing MRP of bouquets by broadcasters so that unwanted channels are not pushed to subscribers increasing the cost to subscribers. There should be linkage of Bouquet price and sum of a-la-carte price so that the pricing is not twisted in favour of bouquets.

ii. In addition to the clause 3(b)(a) of the regulation "The Telecommunication (Broadcasting and Cable) Services (Eighth) (Addressable Systems) Tariff (Second Amendment) Order, 2020" dated 1st Jan-2020 which provides for a direct-correlation with the price of the Bouquets being offered by the Broadcasters vis a vis the ala -

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carte price of the pay channel, following conditions shall be added to the condition prescribed in the clause :

> "The maximum retail price per month of any one à-lacarte pay channel forming part of such a bouquet, shall in no case exceed three times the average maximum price per month of a pay channel of that bouquet"

iii. In order to ensure that popular/premium channels are not unnecessarily clubbed with unpopular channels, we suggest that a price range/band(s) should also be introduced and adhered to for inclusion of channels in a bouquet. Accordingly, for the purpose mentioned above, we would like to suggest a price range/band(s) for inclusion of a channel in a bouquet and the same is/are reproduced herein below:

Sr. No.	**Band(s) for inclusion of a channel in a Bouquet**	**Lower Range (In Rs)**	**Upper Range (In Rs)**
1	Band 1	0.01	1.00
2	Band 2	1.01	4.00
3	Band 3	4.01	8.00
4	Band 4	9.01	12.00

iv. TRAI may further take note that, any channel whose MRP is above Rs. 12/- should not be permitted to be part of a bouquet and mandatorily made ad free

v. In addition to the above, in order to keep the size of the bouquet small and affordable, the formation of bouquet can be made subject to channels within the same genre/same language.

Q4. Please provide your comments on following points with justifications and details:

a. Should channel prices in bouquet be homogeneous? If yes, what should be an appropriate criteria for ensuring homogeneity in pricing the channels to be part of same bouquet?

b. If no, what measures should be taken to ensure an effective a-la-carte choice which can be made available to consumers without being susceptible to perverse pricing of bouquets?

c. Should the maximum retail price of an a-la-carte pay channel forming bouquet be capped with reference to average prices of all pay channels forming the same bouquet? If so, what should be the relationship between capped maximum price of an a-la-carte channel forming the bouquet and average price of all the pay channels in that bouquet? Or else, suggest any other methodology by which relationship between the two can be established and consumer choice is not distorted.

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Hathway's Response:

i. We are of the view that a customer's choice of a channel is not only driven by the price of a channel but also the content of the said channel. Homogeneity in a bouquet should not only be considered as a similarity in pricing but also the homogeneity of the content considering India's social, cultural and demographic diversity. The content creating an equal interest such a popular tv show or a sports program will also drive the consumer selection.

ii. It may be noted that since the broadcasters are controlling the MRP of the channels, the Broadcasters, in response to the regulations/tariff regime enacted by TRAI on the formulation of bouquet has been to overprice a channel to keep it out of the bouquet, knowing well that the consumer that is already used to a particular channel will subscribe that channel.

iii. Hence, in order to protect the interest of a consumer, it is important to ensure the price capping of popular channels so as to keep the channel within the reach of a consumer who wishes to subscriber the said channel. The change in the market scenario is that the Broadcasters are no longer directly concerned with the loss in subscribership in the cable TV platforms so long as they can capture the customer in the alternative OTT platform services that they are providing directly.

iv. If TRAI accepts if the recommendation to cap MRP of channels at INR 12/- per channel, which is the need of the hour for protecting the broadcasting and cable TV industry in India, the question of homogeneity of the bouquet will become less important.

v. We are of the opinion that the twin conditions methodology prescribed in current regulation is sufficient to define the relationship between pricing of a la carte and bouquet price of channel. Further, homogeneity in content will help in curtailing skewed bouquet pricing vs a la carte pricing.

vi. In addition to the above, there should also be restriction on inclusion of any single channel in the bouquets offered by the Broadcasters. A single channel should not be part of more than 10 bouquets offered by the Broadcasters.

Q5. Should any other condition be prescribed for ensuring that a bouquet contains channels with homogeneous prices? Please provide your comments with justifications.

Hathway's response:

Kindly refer to our Response to Question No. 4

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Q6. Should there be any discount, in addition to distribution fee, on MRP of a-la-carte channels and bouquets of channels to be provided by broadcasters to DPOs? If yes, what should be the amount and terms & conditions for providing such discount? Please provide your comments with justifications.

Hathway's Response:

i. It may be noted that ongoing reduction in revenue of MSOs has been mentioned by the TRAI in the consultation paper. It is pertinent to mention that, since the MSOs form the backbone of cable TV industry, it is important to ensure that the profitability of the MSOs is also protected.

ii. It is an evident fact that the broadcasters are earning huge revenues from advertising stream also. However, MSOs have restricted revenue streams/sources.

iii. The 15% incentive being provided by the Broadcasters to MSOs is linked to penetration of the channel or bouquet in the DPO's customer base, is itself contrary to the mandate provided by the regulation, which envisages consumer choice as first and foremost paramount interest of the New Tariff Order (NTO). This is forcing MSOs also to push unpopular channels of the Broadcaster.

iv. <u>In order to curb the anti-regulatory activities by the Broadcasters, we suggest that the distribution fee on both a-la-carte as well as bouquet offerings by the Broadcasters should be made flat at 35% of MRP. This will ensure and keep a check that the DPOs are not arm twisted to meet unreasonable penetration targets set by the Broadcaster.</u>

v. The Broadcaster who sign interconnect agreement with DPOs should also be required to mandatorily sign the carriage RIO of DPO.

vi. We have already stated that on parity, a maximum discount 33% should also be made available to both the broadcasters as well as DPOs, on their bouquet offerings.

Q7. Stakeholders may provide their comments with full details and justification on any other matter related to the issues raised in present consultation.

Hathway's Response:

While Hathway has number of issues pertaining to NTO 2.0 and the existing regulatory framework, however given the issues raised in the Consultation Paper, Hathway would like to highlight the following additional points:

i. Genre wise Capping on MRP of Pay channels including a maximum cap of Rs. 12/- for any pay channel (Irrespective of Genre)

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ii. Incentive of 15% may be combined with distribution fee and make it 35% of the MRP to be given to DPOs for both a la carte channels and bouquets.

iii. DPOs should have freedom to choose channels from Broadcasters bouquet which was prevalent before NTO -1

iv. Linear channels shall be offered to OTT subscribers at MRP declared in RIO of addressable platform.

v. The 60% discount on Multi TV from second TV onwards, which has been mandated by TRAI on DPOs, shall also be extended to Broadcasters. It is very much logical that for each subscriber and its choices of channel, the price is being paid by DPOs to Broadcasters, as it's a part of business value chain, and therefore, if any discount is mandated to be given by DPOs on Multi TV to subscribers, than that same shall be extended by the Broadcasters to DPOs.

Thanking you,

Your Faithfully,

For **Hathway Digital Limited**

HATHWAY DIGITAL LIMITED MUMBAI

AJAY SINGH
Director
DIN: 06899567

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