



Harpal Digital

Meghbela Cable & Broadband Services (P) Ltd
Registered office - 35B/1B, Raja Naba Krishna Street
Kolkata - 700005
Phone :033-2530 2316

20th August'2013

To
The Advisor (B&CS)
Telecom Regulatory Authority of India
Mahanagar Doordarshan Bhawan,
Jawaharlal Nehru Marg,
New Delhi – 110002

Kind Attn: Mr.Wasi Ahmad

Re: Consultation Papers "Distribution of TV Channels from Broadcasters to Platform Operators"

Dear,

This is in reference to the Consultation Papers cited above, we would like to highlight certain recommendations for your kind perusal:

- 1) Definitely, there should be a need of having Reference Interconnect Agreements between MSO & the broadcaster without keeping the aggregators in between. This move shall help both the parties to have clarity towards subscription, Carriage fees for each & every Channel on a separate note.
- 2) The Ministry of Information & Broadcasting has encouraged new entrants in the Digital Addressable System to cater to the needs of the customers. The idea of DAS is to offer its customers choice of Channels & pay accordingly. However, new MSO's are not being able to give the same Channels/bouquets in comparison to other existing/established MSO's, reasons being the deals offered by the existing aggregators. The Broadcaster distributors are offering deals such as Cost Per Subscriber, Minimum Guarantee, Fixed fee deals etc. For example, if a particular aggregator is having 10 Channels in their kitty, MSO's need to pay for all the Channels even if a subscriber opts for a single Channel. This is a problem for both the MSO as well as the subscriber wherein both of them need to pay for something in which he is not interested.
- 3) There should be a national parity towards Agreements between Broadcasters & MSO's towards subscription of each & every Channel in order to provide with the same offerings nationally, else there would be disparities in Channel/bouquet offerings amongst subscribers nationally.



Harpal Digital

Meghbela Cable & Broadband Services (P) Ltd
Registered office - 35B/1B, Raja Naba Krishna Street
Kolkata - 700005
Phone :033-2530 2316

- 4) However, if there are any disputes between the Broadcaster & the MSO's, it can always be settled amicably/in the court of Law (TDSAT) instead of making it Public by way of running On Screen displays as per their wills & whims. Direct interaction with the Channel broadcasters would definitely help in permanently resolving the same.
- 5) Aggregators are even charging for FTA Channels which falls under their respective bouquets.

In lieu of the above, we highly recommend that the powers/authorities of the Aggregators should be immediately limited/restricted & the MSO's should have a right to deal with the Channel broadcasters directly in terms of subscriptions, transmissions & Carriage fees.

Thanks & Regards

For Meghbela Cable & Broadband Services (P) Ltd

**(Tapabrata Mukherjee)
Director**

**MEGHBELA
DIGITAL**