

## **Fwd: Re: Comments on TRAI Consultation Paper on Audit Related Provisions**

**SS** Sapna Sharma <jtadv-bcs@traf.gov.in>  
Fri, 06 Sep 2024 1:40:13 PM +0530

To "Bhupendra Singh" <bhupendra.singh78@traf.gov.in>, "Amrapali saket" <amrapali.105@traf.gov.in>, "Arvind Kumar" <interconnect-bcs@traf.gov.in>

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==== Forwarded message =====

From: rajesh Kumar <[rk.vatsa73@traf.gov.in](mailto:rk.vatsa73@traf.gov.in)>

To: "Sapna Sharma" <[jtadv-bcs@traf.gov.in](mailto:jtadv-bcs@traf.gov.in)>

Date: Thu, 05 Sep 2024 11:58:31 +0530

Subject: Fwd: Re: Comments on TRAI Consultation Paper on Audit Related Provisions

==== Forwarded message =====

Rajesh Kumar Vatsa,  
PPS to Advisor (B&CS)  
TRAI

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==== Forwarded message =====

From: <[piyush.misra.ca@gmail.com](mailto:piyush.misra.ca@gmail.com)>

To: "Deepak Sharma" <[advbcs-2@traf.gov.in](mailto:advbcs-2@traf.gov.in)>

Cc: <[itadv-bcs@traf.gov.in](mailto:itadv-bcs@traf.gov.in)>

Date: Thu, 05 Sep 2024 11:02:44 +0530

Subject: Re: Comments on TRAI Consultation Paper on Audit Related Provisions

==== Forwarded message =====

One more thing to add the Broadcaster must take explanation on Audit Report with in a stipulated time such as 30 days etc  
Sent from my iPhone

> On 5 Sep 2024, at 12:08 PM, Piyush Misra <[piyush.misra.ca@gmail.com](mailto:piyush.misra.ca@gmail.com)> wrote:

>

>

> Kind Attention

> Shri Deepak Sharma ji

> Advisor (B&CS)

> Telecom Regulatory Authority of India

> New Delhi

>

> Sir

> Our comments/ Suggestions on Consultation Paper on Audit related Provisions are given as under:-

> 1. Audit as per 15(1) must be continued as DPO has to be done only 1 audit in a

calender year so it will ease it's technical burden, otherwise it will be very very difficult for Dpo to manage every broadcaster audit,if they don't get every broadcaster audit so there is a 100 percent change of data hiding.

> 2. Audit should be compulsory for every DPO whether it is small or big ,Audit fees can be regulated for smaller DPOs which has subscriber base less than 1000.if they can be exempted from an audit so there is 100 chance that piracy will rise ,they will not show their exact database may be by running other parallel network or by other means ,which can be traced only through an audit.

> 3. Audit should be done as pe calender year.

> 4. Dpo must complete self audit as per 15(1) by 31st June so they will get time from Jan to June ,so after completion of 30th June if Audit is not caused so they have to pay penalty.if broadcasters will cause audit it would be very tough for DPOs to manage all broadcaster audit.

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> Thanking You

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> CA.Piyush Misra

> M.Com.,AICMA, FCA,DISA(ICA)

> PIYUSH MISRA & CO.

> CHARTERED ACCOUNTANTS

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