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Important : Comments Required for consultation paper on Audit related provisions of Telecommunication (Broadcasting and Cable) Services Interconnection (Addressable Systems) Regulations, 2017 and The Telecommunication (Broadcasting and Cable) Services Digital Addressable Systems Audit Manual

Royal Digital Cable <royaldigitalcable.burhanpur@gmail.com>
To: TRAI Bhopal <traibhopal@gmail.com>

Mon, Sep 9, 2024 at 1:09 PM

DATED: 09-09-2024**BY EMAIL**

To,
Sh. Deepak Sharma ji,
Advisor (B&CS), Telecom
Regulatory Authority of India, New Delhi
By Email: advbcs-2@traigov.in

SUB: RESPONSE TO CONSULTATION PAPER DATED 09.08.2024 ON BEHALF OF ROYAL DIGITAL CABLE AND COMMUNICATIONS PVT. LTD

Response is as follows:

Ans. 1

DPOs having subscriber base of less than 20,000 subscribers should be exempted from subscription audit under the Audit u/r 15 (1). In case the DPO submits its compliance report showing compliance of the systems of the DPO then the reports should be considered as deemed corrected.

Ans. 2. A

DPOs having subscriber base of less than 20,000 should be considered as Small DPOs.

Ans. 2.

2. If the compliance report submitted by the TRAI Empaneled Auditor shows compliance to the regulations/schedule then no further audit should be permitted concerning the said period.

Ans. 2. B

Not applicable

Ans. 3

No difference as the DPO is burdened to cause audit after every 12 months.

Ans. 4

- i) No, this will create unnecessary burden on the Auditors in the month of September and this may further create rise in the professional fees of the Auditors.
- ii) After the submission of the Audit Report u/r 15 (1) the Broadcaster shall raise objection (if any and all) within 7 Days of the receipt of the Audit Report.
- iii) No.

Ans. 5

- i. If the regulator is continuing the Audit, then the gap is fine.
- ii. Yes, only subject to the reflection of non-compliance in the audit under 15 (1).
- iii. Yes.

Ans. 6

The major reason for which the Audits are not conducted is the cost involve in the Audits. The DPOs pays to the Auditor and also to its vendors for the support. Therefore, the broadcasters should compensate the DPOs for the Audits by way of discounts/incentives etc.

Ans. 7

Audit should be transparent for the DPO and Broadcaster and no activity should be performed at the back of the DPO in the entire process of the Audit. More specifically activities mentioned under Clause 17.

Ans. 8 - 19

NO COMMENTS

**Your's Sincerely
Deepak Patidar**

ROYAL DIGITAL CABLE AND COMMUNICATIONS PVT. LTD

On Fri, Aug 16, 2024 at 12:58 PM TRAI Bhopal <traibhopal@gmail.com> wrote:
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