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**The Mathrubhumi  
Printing & Publishing Co. Ltd.**

M J Krishnamohan Memorial Building, K P Kesava Menon Road, Kozhikode 673 001  
CIN: U22110KL1922PLC001522

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**BEFORE THE TELECOM REGULATORY  
AUTHORITY OF INDIA  
AT NEW DELHI**

**Response on behalf of The Mathrubhumi Printing &  
Publishing Company Limited, Kozhikode, Kerala  
(Broadcasters of Mathrubhumi News and Kappa TV) to:**

- (i) DRAFT TELECOMMUNICATION (BROADCASTING AND CABLE SERVICES) INTERCONNECTION (ADDRESSABLE SYSTEMS) REGULATIONS, 2016 (hereinafter the “Regulations”); and
  - (ii) THE TELECOMMUNICATION (BROADCASTING AND CABLE SERVICES) (EIGHTH) (ADDRESSABLE SYSTEMS) TARIFF ORDER, 2016 (hereinafter the “Tariff Order”); and
  - (iii) THE STANDARDS OF QUALITY OF SERVICE AND CONSUMER PROTECTION (DIGITAL ADDRESSABLE SYSTEMS) REGULATIONS, 2016 (hereinafter the “said QoS”)
1. Basic Tier – 100 Channels – see page 32 – Paras 43 & 44 of the Tariff Order – Criteria for deciding the Basic Tier of 100 SD channels by MSOs and DTH operators are to be defined. In the News genre, preference should be given to Free to Air Regional News Television Channels to be included in the Basic Tier of 100 Channels. Regional News Channels are predominantly Free to Air Channels and each MSO / DTH operator must ensure that all Free to Air News Channels in a particular region / language for eg., Malayalam language Free to Air News Channels in Kerala State and Tamil language Free to Air News Channels in Tamilnadu.
  2. Format of Agreement between Broadcasters and MSOs may be provided in the Policy.

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3. Provisions for calculation of the carriage fee amount – see: Schedule I – page 41 of the Interconnection Regulations applies only to a new entrant and will not be applicable to Basic Tier and Free to Air Channels. This must be made clear in the Policy.
4. “Must Carry” and “Basic Tier of 100 SD Channels” must be based on each geography. This is necessary to ensure fair play and for removing entry barriers. see: page 116 to 119 – paras 29 to 37 of the Interconnection Regulations.
5. EPGs with detailed description must be made available by all MSOs before the coming into force of these regulations.
6. MSOs / DTH operators must not disconnect any TV channel being carried by them at present. This must be made clear in the policy.
7. In the event it is decided that Broadcasters have to pay Carriage Fee, the said Fee must have a co-relation to the subscriber base, subscriber profile / geography / reach. Subscriber base must be subject to independent Audit like the ABC and Subscriber profile / geography / reach of MSOs should be subject to surveys on the lines of Readership surveys.
8. DAS completion by end-December, 2016 should not be extended for any reason. In Kerala, 95% digitisation is complete and any further extension will be disadvantageous to the Broadcasters and MSOs.
9. With a view to ensure level playing field and transparency, it is necessary to define the Placement fee or Marketing fee or such other fee charged by the MSOs to place a particular channel at a certain position. The maximum rate of 20 paise per subscriber per month as shown in Schedule I – Provisions for calculation of the carriage fee amount – may be made applicable as the maximum rate for allotment of a specified position.

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The above submissions may be taken into account while finalising the Policies. We may be given a personal hearing to make further submissions in this regard.

Dated this the 15<sup>th</sup> day of November, 2016.

for The Mathrubhumi Ptg. & Pbg. Co. Ltd.,

**(Sajeevan Nannat)**

**Senior General Manager-Finance & Company Secretary**

