

To,  
Shri Wasi Ahmad, Advisor (B&CS),  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan (Opp. Ram Lila Gr.),  
J.L.N. Marg, NEW DELHI – 110 002  
[advbcs@traai.gov.in](mailto:advbcs@traai.gov.in) / [traicable@yahoo.co.in](mailto:traicable@yahoo.co.in)

**COMMENTS ON draft regulation “Standards of Quality of Service (Duration of Advertisements in Television Channels) (Amendment) Regulations, 2012” F. No. 23-1/2012- B&CS dt. 27/08/2012**

**VOICE COMMENT:**

Further to our comments submitted on above subject on 23 March 2012 we still would like differentiation between FTA and paid channels. We should not confuse between carriage fees/connection charges being paid to the Cable Operator and fees payable for PAID CHANNELS. Hence we again propose –

- Advertisement for 12 minutes per hour **inclusive of self promotion** for FTA channels is acceptable.
- But for pay channels ideally only self promotions should be allowed as the consumer is actually paying for the program he specifically wants to watch. But to begin with, as a compromise a maximum of 5 minutes per hour of advertisement including self promotion may be allowed for PAID CHANNELS.

Hemant Upadhyay

10 September 2012

Advisor IT & Telecom  
VOICE

**Comments received w.r.t. OHD**

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Shri Wasi Ahmad, Advisor (B&CS),  
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**VOICE COMMENTS ON “Standards of Quality of Service (Duration of Advertisements in Television Channels) after Open House held on 23/11/2012**

**VOICE COMMENT:**

Further to our comments submitted on above subject on 10 September 2012 we still would like differentiation between FTA and paid channels. We should not confuse between carriage fees/connection charges being paid to the Cable Operator and fees payable for PAID CHANNELS. Hence we again propose –

- Advertisement for 12 minutes per hour **inclusive of self promotion** for FTA channels is acceptable.
- But for pay channels ideally only self promotions should be allowed as the consumer is actually paying for the program he specifically wants to watch. But to begin with, as a compromise a maximum of 5 minutes per hour of advertisement including self promotion may be allowed for PAID CHANNELS.
- Viewable screen space at all time other than advertisement time should not be less than 97% mainly for News Channels and sports channels.
- Sports channels may be allowed to have larger variation of say average advertisement time over 3 hours unlike regular channels for 1 hour.
- An opinion also needs to be formed on “Pseudo-advertisement” like inviting stars to promote their films, promotion of financial products/services in the guise of consumer advice, showcasing of real-estate projects etc.
- Channels promoted by MSOs/LCOs also need to be strictly advised / monitored for these regulations.
- Size of “Information Tablet” visible for 5 to 10 seconds while changing channels should also be limited to say 10% of screen on the side of screen.
- Public service obligation related advertisements may be exempted.

Hemant Upadhyay

29 November 2012

Advisor IT & Telecom  
VOICE

----- Forwarded message -----

From: **TRAI CABLE** <[traicable@yahoo.co.in](mailto:traicable@yahoo.co.in)>  
Date: Mon, Dec 3, 2012 at 1:12 PM  
Subject: Fwd: VOICE COMMENTS ON “Standards of Quality of Service (Duration of Advertisements in Television Channels) after Open House held on 23/11/2012  
To: [amshtrai@gmail.com](mailto:amshtrai@gmail.com), [gauriskesari@gmail.com](mailto:gauriskesari@gmail.com), [cpssharmatrai@yahoo.com](mailto:cpssharmatrai@yahoo.com)

--- On **Fri, 30/11/12**, Advisor TRAI <[advbcs@trai.gov.in](mailto:advbcs@trai.gov.in)> wrote:

From: Advisor TRAI <[advbcs@trai.gov.in](mailto:advbcs@trai.gov.in)>  
Subject: Fwd: VOICE COMMENTS ON “Standards of Quality of Service (Duration of Advertisements in Television Channels) after Open House held on 23/11/2012  
To: [traicable@yahoo.co.in](mailto:traicable@yahoo.co.in)  
Date: Friday, 30 November, 2012, 3:11 PM

from adv(b&cs)

----- Forwarded message -----

From: [hupadhyay@consumer-voice.org](mailto:hupadhyay@consumer-voice.org)  
To: advbcs <[advbcs@trai.gov.in](mailto:advbcs@trai.gov.in)>  
Cc: traicable <[traicable@yahoo.co.in](mailto:traicable@yahoo.co.in)>  
Date: Thu, 29 Nov 2012 17:31:41 +0530  
Subject: VOICE COMMENTS ON “Standards of Quality of Service (Duration of Advertisements in Television Channels) after Open House held on 23/11/2012  
To,  
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VOICE COMMENTS ON “Standards of Quality of Service (Duration of Advertisements in Television Channels) after Open House held on 23/11/2012

VOICE COMMENT: (a word doc. is also attached)

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29 November 2012

Hemant upadhyay  
Advisor-IT & Telecom

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