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## FEDERATION OF CONSUMER AND SERVICE ORGANIZATIONS

(Regd. No.CAG/01/2016 as a Consumer advocacy group with TRAI)

No.5, 4<sup>th</sup> Street, Lakshmipuram,  
Tiruchirappalli – 620 010. T.N. State .

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The Chairman,  
Telecom Regulatory Authority of India,  
New Delhi – 110 002

29<sup>th</sup> May, 2016

Kind attention to: Shri Sunil Kumar Singhal, Advisor (B&CS)

Sir,

Sub: Forwarding our view on consultation paper on Interconnection framework for Broadcasting TV Services distributed through Addressable System dated 4<sup>th</sup> April, 2016 – reg:

We have pleasure in forwarding our suggestions for your kind consideration and our views on the above consultation paper including our other suggestions;

### Others:

The present system of Customer complaints lack transparency. Whatever the Customer Care Executive says is final and mostly the customer is left dissatisfied. It is very difficult to get Customer Service of any service provider. Instead we recommend, the Consultative Committee could redress the issue by passing orders.

The network drops are a major issue. Some service provider signals drop for many minutes with the Broadcaster, resulting in loss of communication for minutes at a stretch.

The Consumers/ subscribers are unaware of whom to contact or to address this problem.

Apart from dispute between the Broadcaster and distributors the consumers are affected adversely, they simply disconnect signals for their disputes without considering whether the customers have paid, even if, for one year subscription.

Radio Frequency signals can be tried out and service providers must provide uninterrupted signal. Severe penalty must be levied on service providers failing to adhere to this.

Many STBs have dropped signals or unable to provide all the channels assured due to inter service providers wrangles. The sufferer is the customer. This should be eliminated.

The picture clarity is vary from one to another, the cable operators are even now using old technology instead of switchover to Fibre Cable..

The cable operator block selected channels due dispute between them.

The high number of advertisements are big nuisance to the consumers, these have to be restricted and regulated by the regulator. The subscribers are paying for viewing television programmes, without disturbance and without loss of continuity.

For mere money; the broadcaster telecast false, frivolous and at times misleading advertisements and this is also another way of exploitation.

Also should consider in checking exploitation on the viewers through advertisement as well as game show affecting children, with value added SMS, in such case the cost of the SMS must also be displayed.

The telemarketing also one of the great nuisance to the end-users;Most of the subscribers are unaware about Do Not Disturb option. The Regulator must consider in ensuring the telemarketing to get the consent before sending advertisements and offers to the Consumers.

With regards and respects.

M. Sekaran,

President.

Attached: over view on Consultation Paper..

## **OUR VIEW ON TRAI CONSULTATION PAPER:**

### **CHAPTER-4**

#### **ISSUES FOR CONSULTATION**

The following issues have been posed for consultation. To better understand and appreciate the viewpoint/comments it is essential that the same are supported with appropriate reasoning.

#### **Issue 1:- COMMON INTERCONNECTION FRAMEWORK FOR ALL TYPES OF ADDRESSABLE SYSTEMS [3.2 to 3.5]**

- **Common Interconnection Framework for all types of addressable system will help to the Consumers. The technical details would get from the competent persons.**

#### **Issue 2:- TRANSPARENCY, NON-DISCRIMINATION AND NON-EXCLUSIVITY [3.6 to 3.25]**

- **The Consumer interest will be taken for consideration.**

#### **Issue 3:- EXAMINATION OF RIO [3.26-3.32]**

- **The RIO may be published through leading English, Hindi and respective Regional Language News papers in their service areas and with the web site of regulator as well as service providers website. The stakeholder may be permitted to raise objections on the terms and conditions of the draft RIO published within 30 days.**

#### **Issue 4:- TIME LIMIT FOR PROVIDING SIGNALS OF TV CHANNELS / ACCESS TO THE PLATFORM [3.33-3.39]**

- **This may be reduced to 30 days..**

#### **Issue 5:- REASONS FOR DENIAL OF SIGNALS / ACCESS TO THE PLATFORM [3.40-3.42]**

- **Yes, it should it be made mandatory for service providers to provide an exhaustive list in the RIO which will be the basis for denial of signals of TV channels/ access of the platform to the seeker.**

**Issue 6:- INTERCONNECTION MANAGEMENT SYSTEM (IMS) [3.43-3.48]**

- **In the interest of subscribers/ end users, the IMS should be developed and it should bring under direct control of the regulator.**

**Issue 7:- TERRITORY OF INTERCONNECTION AGREEMENT [3.49-3.51]**

**We feel it is reasonable. One agreement is adequate and it will help the regulator to monitor closely.**

7.2 Should MSOs be allowed to expand the territory within the area of operations as permitted in its registration issued by MIB without any advance intimation to the broadcasters?

**Only on advance intimation and approval. But the authorities must clear it immediately, as this will benefit the end users with better coverage as well as options.**

7.3 If no, then should it be made mandatory for MSO to notify the broadcaster about the details of new territories where it wants to start distribution of signal a fresh in advance? What could be the period for such advance notification?

**Even in case of affirmative for the above, MSO must made mandatory to notify the broadcaster in order to enable what is happening. Else authoritarian and muscle power acts might be enforced.**

**Issue 8:- PERIOD OF AGREEMENTS [3.52-3.55]**

**> No comments..**

**Issue 9:- CONVERSION FROM FTA TO PAY CHANNELS [3.56-3.57]**

- **Yes.. they it may be mandatory..**

**Issue 10:- MINIMUM SUBSCRIBERS GUARANTEE [3.58-3.62]**

- **No comments.**

**Issue 11:- MINIMUM TECHNICAL SPECIFICATIONS [3.63-3.67]**

11.1 Whether the technical specifications indicated in the existing regulations of 2012 adequate?

> **Not adequate.. the existing regulation may incorporate that before sending commercial SMS, they first obtained the connect of subscribers. In case of wrong doing; based on complaint or suo - motto the regulator will initiate action against the agencies.**

**Issue 12:- TECHNICAL AUDIT OF ADDRESSABLE SYSTEMS [3.68-3.72]**

- **No comments.**

**Issue 13:- SUBSCRIPTION DETAILS [3.73-3.80]**

- **Yes, common format for subscription report be specified in the regulations with adequate and required details.**

**Issue 14:- DISCONNECTION OF SIGNALS OF TV CHANNELS [3.81-3.84]**

- **yes, thirty days period for ordinary cases, if any special, the notice time may reduce even 24 hours.**

**Issue 15:- PUBLICATION OF ON SCREEN DISPLAY FOR ISSUE OF NOTICE FOR DISCONNECTION OF TV SIGNALS [3.85-3.88]**

- **The present system is good and helping to Consumer/ subscribers. The notice of the disconnection should through in full screen and partial part of the screen; when the programe is telecasting.**
- **Yes, the requirement for publication of notices for disconnection in the news papers may be dropped.**

**Issue 16:- PROHIBITION OF DPO AS AGENT OF BROADCASTERS [3.89-3.91]**

- **The Regulations should be formed in appointing a MSO by broadcaster. The Appointment will subject to intimation and approval of Regulator.**

**Issue 17:- INTERCONNECTION BETWEEN HITS/IPTV OPERATOR AND LCO [3.93-3.96]**

17.1 Whether the framework of MIA and SIA as applicable for cable TV services provided through DAS is made applicable for HITS/IPTV services also.

> **Yes..**

> **proposed changes would give due consideration/ importance to the end users interest .**

**Issue 18:- TIME PERIOD FOR PROVIDING SIGNALS OF TV CHANNELS [3.97-3.99]**

- **The present duration may be reduced consultation with service providers.**

**Issue 19:- REVENUE SHARE BETWEEN HITS/IPTV OPERATOR AND LCO [3.100-3.103] Page 71 of 77.**

- **No comments..**

**Issue 20:- NO-DUES CERIFICATES [3.104-3.107]**

20.1 Whether a service provider should provide on demand a no due certificate or details of dues within a definite time period to another service provider? If yes, then what should be the time period?

> **It is not require..**

**Issue 21:- PROVIDING SIGNALS TO NEW MSOs [3.108-3.110]**

- **No comments.**

**Issue 22:- SWAPPING OF SET TOP BOX [3.111-3.113]**

22.1 Whether, it should be made mandatory for the MSOs to demand a no-dues certificate from the LCOs in respect of their past affiliated MSOs?

**> Not require, this would affect the endusers adversely, when claiming the No due; the possibilities are there in exploiting the consumers..**

22.2 Whether it should be made mandatory for the LCOs to provide copy of last invoice/ receipts from the last affiliated MSOs?

**> Not require..**