



Cable tv operators association

Kerala State Committee

Date.....

29th July 29, 2014

To,
Mr. Agneswar Sen
Advisor (B&CS)
Telecom Regulatory Authority of India

Respected Sir,

Ref:- Consultation Paper, No. 07/2014, on the Regulatory Frame Work for Platform Services Dated 23 June 2014

Sub:- Comments of Cable Operators Association of Kerala.

This is in reference to the discussion on the regulatory framework for all operators providing Platform Services (PS). On behalf of the Local Cable Operators in the State of Kerala, we would like to submit the following suggestions to your queries on Platform Services (PS).

1) Do you agree with the following definition for Platform Services (PS)?

In our considered opinion, the LCO also operates local based programs in his network, other than the services available from his MSO. So the definition of Platform Services (PS) should include the services not only from the MSO, but also the Local Cable Operators.

2) Kindly provide comments on the following aspects related to programs to be permitted on PS Channels:

It contains mainly local programs, in which the Broadcasters are not at all interested. News and current affairs cover only local based issues. There is no question of



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any Doordarsan channels or any other channel programs being re-transmitted. Thus, we suggest that all local based programs, including news, current affairs, political, sports, cultural etc. shall be allowed to be transmitted, which comes under his (LCO) network, restricting State level or National level programs.

(3) PS channels can transmit/include Movie/Video on demand by obtaining permission from authorities (cinema producers/companies usually issue license to transmit movies to local operators), interactive games, coverage of local cultural events and festivals, traffic, weather, educational/academic programs (such as coaching classes, discussions etc.), information regarding examinations, results, admissions, career counseling, availability of employment opportunities and job placement. We suggest that such PS should work as a community television for the local area by providing all information. It shall be permitted to carry all localised information relating to common necessities like water, electricity, education, health, etc.

4) What should be periodicity of review to ensure that the PS is not trespassing into the domain of regular TV broadcasters?

A local based monitoring under the guidance of District Collector or RDO shall be engaged to monitor every 3 or 6 months that the PS is not trespassing into the domain of regular TV broadcaster.

5) Should it be mandatory for all DPOs to be registered as Companies under the Companies Act to be allowed to operate PS? If not, how to ensure uniform legal status for all DPOs.

The DPO under the DAS environment should have DAS license, which can be used



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for this. But in the case of a LCO it is difficult for him to form a company for running the local channel. So postal license shall be used to LCO to ensure his existence and legal status.

6) Should there be any minimum net-worth requirement for offering PS channels? If yes, then what should it be?

Not required as these are only small scale and tiny units with limited area of operation.

7) Do you agree that PS channels should also be subjected to same security clearances/conditions, as applicable for private satellite TV channels?

In our view, it would not be workable and possible at all. On the other hand, Multi-level monitoring from State to Taluk levels is the best and effective option.

8) For the PS channels to be registered with MIB through an online process, what should be the period of validity of registration and annual fee per channel?

As suggested earlier, a registration under State level PRD shall be introduced and it may be for three years. The operators will find it difficult to obtain license from MIB.

9) Should there be any limits in terms of geographical area for PS channels? If yes, what should be these limits?



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Yes indeed, it should not overlap beyond his network area.

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10) Should there be a limit on the number of PS channels which can be operated by a DPO? If yes, then what should be the limit?

A DPO can have multi-layer channels at its, (1) entire network or State level, (2) District level, or, (3) Local (Taluk) level.

11) What should be the time limit that should be granted to DPOs for registration of the existing PS channels and bring them in conformity with the proposed regulatory framework once it is notified by MIB?

On the time of digitising network or within a maximum period of one month.

12) Stakeholders may also provide their comments on any other issue relevant to the present consultation, including any changes required in the existing regulatory framework?

Apart from the above suggestions, we would like to inform that there are channels under every DPO. The DPO runs the said channels as State level, District level and Taluk level and even some cluster of operators run the very same localised programs in the channels. This aspect may be kindly taken note of.

More to the above we request your attention that a huge investment has been made by operators to run the channels and a good number of employments is involved in this. As such any move to ban such local channel activities would not only affect freedom of media but loss of employment.

Thanking You,
Yours Faithfully \

N.H. Anwar

President, Cable Operators Association of Kerala (COA Kerala)

