

**Comments of Issues for Consultation
05-06-2022**

Q1. Should TRAI continue to prescribe a ceiling price of a channel for inclusion in a bouquet?

- a. If yes, please provide the MRP of a television channel as a ceiling for inclusion in a bouquet. Please provide details of calculations and methodology followed to derive such ceiling price.
- The trai should check the price and the billing collected for a particular channel or a bouquet during the analog period, from the beginning period of a particular broadcaster and to compare the increase of prices made during the analog period for every year.
 - From this data trai should make a graph and as per the graph pricing should be fixed. Even for a 0.10 Paise (Nat Geo, Raj News) there are channel
 - Trai should take into the account , the transaction period of analog to digital conversion the monthly revenue generated by the broadcaster invoices made to the DPO's.
 - TRAI should take account of the Advertisement Revenue of the particular channel as a customer is paying they should not add advertisement in it

Q2. What steps should be taken to ensure that popular television channels remain accessible to the large segment of viewers. Should there be a ceiling on the MRP of pay channels?

- Same methodology to be followed as Q1.

Q3. Should there be ceiling on the discount on sum of a-la-carte prices of channels forming part of bouquets while fixing MRP of bouquets by broadcasters? If so, what should be appropriate methodology to work out the permissible ceiling on discount? What should be value of such ceiling? Please provide your comments with justifications.

- There should be no discount, as level playing starts there.



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Q4. Please provide your comments on following points with justifications and details:

a. Should channel prices in bouquet be homogeneous? If yes, what should be an appropriate criteria for ensuring homogeneity in pricing the channels to be part of same bouquet?

i) When a broadcaster telecast a channel for Rs 0.10 paise Why cant the broad caster can telecast the channel for below Rs 5, then the consumer can buy the channel easily. Its free in OTT.

b. If no, what measures should be taken to ensure an effective a-la-carte choice which can be made available to consumers without being susceptible to perverse pricing of bouquets?

i) The DPO's should not allowed to form boquet it gives rights to a customer to choose , the pricing will also reduced by the broadcaster to make the consumer to choose the channel.

c. Should the maximum retail price of an a-la-carte pay channel forming bouquet be capped with reference to average prices of all pay channels forming the same bouquet? If so, what should be the relationship between capped maximum price of an a-la-carte channel forming the bouquet and average price of all the pay channels in that bouquet? Or else, suggest any other methodology by which relationship between the two can be established and consumer choice is not distorted.

Q5. Should any other condition be prescribed for ensuring that a bouquet contains channels with homogeneous prices? Please provide your comments with justifications.

i) When a broadcaster telecast a channel for Rs 0.80 paise Why cant the broad caster an telecast the channel for below Rs 5 that's how the consumer can buy the channel easily. Its free in OTT



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d. Should the maximum retail price of an a-la-carte pay channel forming bouquet be capped with reference to average prices of all pay channels forming the same bouquet? If so, what should be the relationship between capped maximum price of an a-la-carte channel forming the bouquet and average price of all the pay channels in that bouquet? Or else, suggest any other methodology by which relationship between the two can be established and consumer choice is not distorted.

i) When a broadcaster telecast a channel for Rs 0.80 paisa Why cant the broad caster an telecast the channel for below Rs 5 that's how the consumer can buy the channel easily. Its free in OTT

Q6. Should there be any discount, in addition to distribution fee, on MRP of a-la-carte channels and bouquets of channels to be provided by broadcasters to DPOs? If yes, what should be the amount and terms & conditions for providing such discount? Please provide your comments with justifications.

i) There should be no discount, only MRP as level playing starts there.

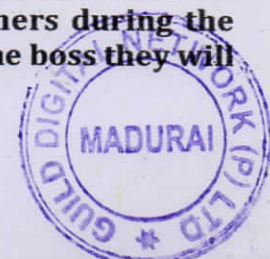
Q7. Stakeholders may provide their comments with full details and justification on any other matter related to the issues raised in present consultation.

i) From analog to digital conversion only the subscriber or an mso had given the set top boxes there is no roll by the broadcaster in this conversion.

ii) For head end also the mso had invested huge investment, and there is no roll by the broadcaster during the conversion of digital.

iii) During analog period there was many distributors to distribute their channels on district wise. The broadcaster paid nearly 30 to 50 percent to distribute their channels but in this digital there is no distributor point for this broadcaster even their not ready to reduce the price for customers.

iv) If only the consumer can choose the channels all problems will be solved initially as small struggle occurred during conversion of analog to digital same will be happen to the consumers during the selection time then it will be smooth. As customer is the boss they will have full rights to select what he want to see.



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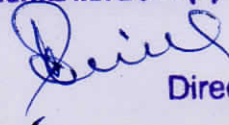
- v) If DPO's has no rights to form a MSO packs the true digitalization will start
- vi) NCF should be fixed for all and billing should be made as per the fixed NCF of trai
- vii) The broadcaster should be restrained to retransmit the content of Linear channels through any other modes as they are increasing the prices of subscriptions on CABLE TV and they are providing the same content through OTT channels, this is nothing but an attempt to bypass the law. The content available on linear channels should not be allowed to be retransmitted by the broadcaster through their OTT apps.
- viii) The broadcaster may be restrained to make a bouquet of channels and should only provide the channels through the AL-A-CARTE system, the subscribers should not be confused while subscribing to the broadcaster packages.
- ix) The Schedule III compliance report and subscription report of all the DPOs should always remain available in the public domain and Trai Audit must be paid by the broadcaster.
- x) xi) That the industry is going through very crucial times and OTT is about defeat the entire cable tv industry by just providing the content at low prices, today, the content producers are selling their content to OTT apps and are not giving the content to CABLE TV broadcasters, this discussion is required to be conducted with the broadcasters so that shall be able to procure more content for the subscribers
- xi) That the independent MSOs and LCOs have suffered a lot during these NTO times and now we are not in a position to handle any more complexities in the business, experiments of the regulator will harm the business and close the operations which will lead to severe unemployment and crises for the industry.

Kindly do the needful to save the customer and MSO from the greedy Broadcasters

Thanking you

Yours Truly,

For GUILD DIGITAL NETWORK (P) LTD.,



Director