

RST Digital Media comments' on the consultation paper on Renewal of Multi-System Operators (MSOs) Registration

3.1 What should be the period of extension/renewal, to be prescribed in the Cable Television Networks (Regulation) Act, 1995 /Cable Television Networks Rules, 1994, on the expiry of the initial period of permission of MSO registration? Please elaborate your response with justification.

*Ans: Cable TV Sector is in its Middle age and a subsequent Renewal of 10 years will be sufficient as Technological changes predict **today's** mode of Cable TV Sector distribution will slowly cease to exist as medium to distribute content .*

3.2 Whether a one-time fee should be levied at the time of renewal of the MSO registration? If yes, please suggest amount of fee for such renewal to be prescribed in the Cable Television Networks (Regulation) Act, 1995 /Cable Television Networks Rules, 1994. Please provide detailed reasoning for your comment.

Ans : The earlier Rs 1 lakh registration was a huge burden on small time MSO , so a Slab should be fixed to ascertain the renewal fees. Like Below 5000 points nil , Above 5000 to 50000 points Rs 50000, above 50000 points Rs 1 lakh.

3.3 Should a time window be prescribed before the expiry of MSO registration, within which the MSO shall apply for renewal of the MSO registration?

Ans : Yes a time period should be prescribed as in the name itself "Renewal" means the License should be ACTIVE . Any License coming after the expiry date should be treated as Fresh applicant.

3.4 In case an MSO has applied for renewal, and the final decision on renewal is pending, what should be the provision to ensure continuity of service for the consumers on expiry of previous registration?

Ans : As the renewal affects thousands of consumers the consumers should be not affected and Existing MSO should be provided the options to merge with any other neighbouring MSO if they decide to stop operating or License is not renewed for a very sufficient reason . Frivolous reasons should not be a reason for refusal to renew and the renewing authority should be fully prepared to substantiate the reasons for not renewing.

3.5 In case an MSO hasn't applied for renewal before the expiry of its registration:

And: Literally If a MSO does not apply means they are not interested in the trade and want to exit . A notice before expiry date can be issued.

3.5.1 What should be the status of services by such MSO after the expiry of registration? As per extant guidelines/ regulations an MSO with valid registration only can get the signals of a television channel. Should a broadcaster disconnect the television channels for such MSOs whose registration has expired?

Ans : Broadcasters are bound by rules and surely they cannot provide Signals to expired Licence holders unless they are intimidated by Licensing authority for the delay or renewal application proof is given to them and the process is pending before the licensing authority.

3.5.2 Should existing registered operational MSOs be provided with an extended time beyond the original registration period for applying for renewal? What should be the maximum time after expiry up to which an application for renewal can be entertained by MIB?

Ans : An extension time should be given only to those who have applied for renewal and even if rejected some time should be also given so as to time for appeal.

3.5.3 Should there be an additional fee for such applications that are received after the expiry of registration period?

Ans : All applications after renewal should be treated as fresh applications.

3.6 Should some qualifying conditions be prescribed for renewal of MSO registration, under which the MSO, along with the application for renewal, shall be required to submit its compliance status with the terms and conditions of registration and the extant regulatory framework?

Ans : Again 100% Compliance should be a criteria only for PAN India MSO and many Small MSO find it hard to understand the process. So this should not deprive them of the opportunity of the right to operate . For example the Criteria to maintain Toll Free number doesn't make sense at local level MSO and where a Small MSO operates locally and gives personalised service which cannot be given by a PAN India MSO So here things like Toll free number , Computerised menus are not used as they are offering more better options for customer service support. Even if implemented no Consumer would not waste time pressing options in the menu based Toll free options rather than dial the Human complaint receiver directly.

Please provide the details of:

(i) List of necessary compliances that should be mandatory for considering renewal of MSO registration,

Ans: A MSO without serious consumer disputes means their ability to serve consumers is proven and also , Pay their Taxes and does not indulge in Tampering database reports or anti national activities. Other routine compliances can be achieved but not consumer satisfaction cannot be bought from.

(ii) List of documents, which may include, but may not be limited to, self-certifications, NOCs from TRAI/MIB/licensing authority, audit reports etc. that would be required to be submitted for verification of such compliances at the time of application,

Ans : MSO should be Tax Compliant and should submit proof of their tax Compliance , in addition to audit reports .

(iii) Any other mandatory requirements for verification of status of compliances of the MSOs before grant of renewal of registration.

Ans :As said previously Tax compliance should be a criteria .

Please elaborate your suggestions with reasons for the mandatory requirement of each compliance in tandem with ease of doing business in the television distribution network.

3.7 Should there be any additional terms and conditions for renewal of the permission for MSO registration? Please elaborate.

Ans: Present ones cover most of variations in situations

3.8 Stakeholders may also provide their comments on any other issue relevant to the present consultation.

And : Already mentioned some regulatory compliances like compulsory Toll free number where the Toll free number system doesn't work OK and most telecom companies don't allow calls on the basic pack recharge to these so called "Toll free numbers" , and the local Operator mobile works perfectly Ok and comes Free to Dial from. any mobile is a better idea , is a better method to achieve customer satisfaction.