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Subject In Response/Suggestion to the Consultation Paper dated 07.05.2022 by M/S
: SIVKAMI AMMAN CABLE TV SYSTEMS

To : Anil Kumar <advbcs-2@traf.gov.in>, V.K. Aggarwal <jtadvbcs-1@traf.gov.in>,
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Respected Sir,

Well. We are a multi-Systems Operators based in parts of Tamil Nadu, our suggestions to the consultation paper are as follows:

A. 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.

B. 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.

C. If the broadcaster is making a bouquet, it may be permitted to do so but no discount difference shall be allowed between bouquet and al-a-carte channels, if the Broadcaster wishes to promote any of its channels, then it should offer a discount on the basis of equality.

D. 15% Slab of discount should be removed and broadcasters should be given a free hand to offer the discounts on al-a-carte channels but the discounts offered should be non-discriminatory to all the DPOs and subscribers whether al-a-carte or bouquet.

E. The broadcasters should be restrained to do any type of agreements like marketing, distributorship, etc with any DPO or any of the subsidiaries/holding of the DPO.

F. The Schedule III compliance report and subscription report of all the DPOs should always remain available in the public domain.

G. 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.

H. That keeping the complex regulatory system has harmed the industry more than anything and will continue to harm the service providers if freehand is not provided to all the service providers. It is pertinent to mention here that though regulations are extremely necessary but they same are meant to nourish the business and not to harm the business.

I. 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.

In the circumstances, we request you to consider our points to make the industry better and nourish.

Thanking You

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With Trust in God

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