



## CABLE OPERATORS WELFARE FEDERATION (INDIA)

A-201, Dr. Ambedkar Nagar, Sector-2, New Delhi-110062

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Greetings of the Day!

Date: 23<sup>rd</sup> December 2021

Mr. V. K. Agrawal

Joint Advisor (BCAS)

TRAI

New Delhi

Respected Sir,

Subject: Refer to your Letter No. "F.No. :RG-8-1/[9]/2021-B&CS Dated 22<sup>nd</sup> Dec. 2021"

We have come across copy of the captioned letter and have to convey as under.

The initiative to hold the meeting is as laudable as inexplicable is the omission to include LCOs in this vital exercise. It pains us to see continued neglect of LCO fraternity As per TRA itself over 98% market is owned by LCOs and therefore they deserve invite more than the DPOs who own less than 2% of the Market. The invite to Corporate Players and omission of entrepreneurs sends out signal of feudal approach

Kindly do not misread this as a self-invitation instead of taking this as a sincere request from thousands of LCOs whom we represent and their lakhs of Subscribers. We have been overlooked, if not sidelined in all critical matters related to our Business. History stands in testimony to the LCOs role in DAS roll out and Customer handling for decades

LCOs deserve to be treated as **frontline workers** who touch base with each Subscriber at least once a month and understand their customers much better than any CAF saved on DPO Servers. In a country where half the people do not subscribe to Internet, continue to use Feature phones the Web based communication that DPOs adopt is ineffective. The best way



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to reach the Subscribers would be communicating in person, in their language, printed handouts to evaluate the options and thus help them make a well-informed decision

The implementation, if it can be so called, of NTO 1 was a disaster with most MSOs designing Best Fit Plans to protect their revenues from Pay Feed and Carriage and failure to educate LCO and Subscribers in any manner. You may not be aware but it was the LCOs, who spent thousands of rupees to print Request Forms, collect and feed the Data into their Systems for onward transmission to MSOs

it is most regrettable that at no point in their entire lifetime have the DPOs made any efforts, expect a few Ads here and there and cryptic messages on/via STBs, to educate the Subscribers connected by us to their Systems

The Broadcasters did use spare airtime, but more to sell their respective offerings and deride the Cable Networks.

If the Value chain above us and the Regulator itself are inclined to empower the Subscriber, inputs and propositions from LCOs need to be taken into account so that the emergent SOP is user friendly

The Market discovery of prices and consumption pattern evolution cannot be back-end driven; rather the front-end instructions should drive the backend. The DPOs manage the back-end that would implement the service requests coming in from the front-end and should not be imposing any Packages and choices on the Subscribers

The LCO fraternity is driven by a sincere desire to ensure that the gamechanger Regulations are adopted across board. The roll out will discharge our duty to our Customers and also protect the future of wireline distribution business



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We are afraid that unless the implementation is taken up as a Mission to grant the Subscribers freedom to Packages and hike Subscription (Inter Connect Fees) and leave the LCOs to helplessly face barrage of protests from his Customer

**We therefore call upon you to extend an invitation to at least two each LCO representatives from the Four Zones or four from All Indian Federation.**

Needless to mention, LCOs are aware of Rules of the game as far as specific Agenda is set and will not demean the occasion by referring to other Inter Se Issues

We hope to hear soon from you in the affirmative

Thanking you,

**CABLE OPERATORS WELFARE FEDERATION OF (INDIA)**

**Dushyant Kanojia**

**General Secretary**

**9810813173**

CC to TRAI and MIB