



TEL.: 022 - 2351 5531
FAX : 022 - 2352 2062
E-mail : filmfed52@gmail.com
supransen@filmfed.org
Website : www.filmfed.org

REGD. OFFICE
B/3, EVEREST BUILDING,
TARDEO, MUMBAI-400 034.

FFI/011/2016
January 13, 2016

Ms. Vinod Kotwal
Advisor (F&EA),
Telecom Regulatory Authority of India (TRAI)
Jawahar Lal Nehru Marg,
New Delhi - 110 002.

Subject :- Comments of the Federation of Indian Chambers of Commerce and Industry (FICCI) on TRAI's Consultation Paper on Differential Pricing for Data Services.

Dear Madam,

COUNTER COMMENTS ON TRAI CONSULTATION PAPER ON 'DIFFERENTIATED PRICING FOR DATA SERVICES.'

Film Federation of India (FFI) would like to commend the Telecom Regulatory Authority of India (TRAI) for running an open and transparent consultative process on the issue of differential pricing.

Our Federation is the recognized apex body of film bodies across all states and regions of India and represents the production, distribution and exhibition sectors. The entertainment industry plays a major role in providing wholesome family entertainment to all parts of the country, across all languages and all economic strata.

The FFI firmly believes in the potential of the Internet and telecommunications to stimulate growth, eliminate inequalities and encourage entrepreneurship in the entertainment sector. The importance of the Internet and connectivity has significantly increased in recent times.

At one level, the Internet space has yielded additional digital rights that account for sizable revenues to our films. Additionally, social media as an advertising and marketing tool has significantly more reach and is cost efficient compared to traditional media. This is the positive side. On a negative note, piracy through digital downloads of our product too has grown exponentially.

For our sector the following three considerations are equally important.

1. The Internet environment stimulates entrepreneurship, fair pricing and healthy competition.
2. The Internet can be accessed by people across all regions, languages and economic and social strata.
3. The environment is secure and conducive to the protection of our intellectual property.



TEL.: 022 - 2351 5531
FAX : 022 - 2352 2062
E-mail : filmfed52@gmail.com
supransen@filmfed.org
Website : www.filmfed.org

REGD. OFFICE
B/3, EVEREST BUILDING,
TARDEO, MUMBAI-400 034.

.. 2 ..

The key difference between the developed world and developing economies is the concept of "fair pricing". The divergence in economic strata is so large that historically we have distributed essentials to the economically weak through subsidized schemes via "fair priced" shops. This was a way of ensuring fairness and has played a role in India's development and growth.

Internet is fast becoming an essential commodity.

This growth and development can only come about by providing high-speed and affordable internet connectivity to every Indian. To achieve this goal, TRAI must adopt a regulatory approach which creates a conducive environment for experimentation and innovation in technologies, business models and service offerings -innovation and innovative business practices are important tools which can supplement initiatives of government, benefit consumer choice and enhance competition.

In this regard, we would like to suggest the following comments for consideration to the TRAI.

1. Fair Pricing be viewed in the context of an economically diverse India.
2. While legislating, TRAI should ensure that an apparently fair pricing should not reduce growth of connectivity.
3. Pricing should never become restrictive or coercive. The industry has suffered from the evil of carriage fees in the cable and television industry. We do not want to go there again.
4. Connectivity should be encouraged at all levels and for all strata. If initial incentives clash with price structures then we need to innovate structures.

We agree that this is a complex argument and occasionally appears conflicting, but India is a complex country.

We urge you to give this process more time and involve all stake holders, especially content producers as we create so much of what circulates on the Internet.

Sincerely,

T. P. Aggarwal
President
Film Federation of India

C. C. Shri Arun Jaitley
Hon'ble Minister of Finance, Information and Broadcasting, Corporate Affairs,
Government of India, New Delhi - 110 001