



**TV TODAY NETWORK LTD.**

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To,

Prof. M. Kasim  
Advisor (B&CS)-III  
Telecom Regulatory Authority of India  
Mahanagar Doorsanchar Bhawan  
Jawahar Lal Nehru Marg  
New Delhi-110002

21.07.2016

Email: [mkasim@traigov.in](mailto:mkasim@traigov.in)

Dear Sir,

**Subject: Ref. Consultation on Issues related to Digital Terrestrial Broadcasting in India.**

Please find enclosed herewith the comments from TV Today Network Limited (TVTN) with regard to the captioned Consultation Paper.

Thank you.

Yours sincerely,

For TV Today Network Limited

  


Dr. Puneet Jain  
Group Chief Law & Compliance Officer, CS & VP (Internal Audit)



## Consultation Paper on Digital Terrestrial Broadcasting in India

TV Today Network Limited's comments on the Consultation Paper are as follows:

1. Our understanding is that the Digital Terrestrial Broadcasting would cover only Free to Air channels. In case our understanding is correct, we do not perceive the need for introduction of Digital Terrestrial transmission in addition to the already multiple broadcasting distribution platforms, for the reason that the consumers may have to avail more than one distribution platform in order to have both FTA and Pay channels. If however, Digital Terrestrial Broadcasting would cover both FTA and Pay channels, then we would recommend its introduction since it would increase competition in the market, thereby helping in raising the standard of services offered to the consumers, besides having a distinct advantage of being operated in low spectrum along with penetrating rural areas in multiple platforms like Mobile, TV, etc.
2. In case, Digital Terrestrial Television Broadcasting is introduced, then we recommend the participation of private sector in it, private players will offer new and differentiated content to the viewers, besides offering socially relevant programming such as educating, health and care. It would also ensure better coverage of local issues and increased competition.
3. Out of the proposed 3 models, we think "Transmission Network Model" would be the most suitable, due to the fact that it will have separate entities for providing transmission and services. This would ensure that a particular entity may focus on its own sphere of work, besides bringing technological excellence and efficiency in the sector and ensuring that optimal utilization of the existing infrastructure. It would also help encourage investment into the sector.
4. Spectrum being a scarce resource, it is important to use it judiciously. We recommend the "Hybrid" approach for implementing DTT Network on account of the fact that it requires lesser spectrum for implementation and operability.
5. As far as the roadmap for digitization of terrestrial TV network in the country, we wish to state that until the digitization of terrestrial broadcasting is completed or partially completed, analogue network shall not be switched off. Since introduction of digital terrestrial broadcasting is a new area, similar to the case of digital addressable systems where only gradually analogue networks are being phased off, experience should be had while implementing the digital terrestrial TV network and digitization of terrestrial TV should go hand in hand with Analogue terrestrial Network. We believe the analogue switch off date for terrestrial TV channels may be best decided by the Authority.