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MediaNama.com's response to TRAI's Consultation Paper on Mobile Value Added Services

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Version 2

Executive Summary

1. MediaNama (www.medianama.com), the premier website for news and analysis of the digital ecosystem in India, welcomes the Telecom Regulatory Authority's interest in ensuring the creation of a healthy and flourishing Mobile Value Added Services ecosystem, since this industry is an integral part of the nascent digital ecosystem in the country, with the potential to impact the livelihood of hundreds of millions of individuals.
2. Mobile Value Added Services companies are currently operating as vendors to telecom operators, and the provisioning of their services and their fate is entirely in the control of the UASL/GSM/CDMA Access Service Providers. The MVAS business is already regulated by the authority *through* these Access Service Providers, and as such, we do not feel there is a need for further regulation of Mobile Value Added Services companies. Licensing is out of the question, since the digital content and services ecosystem is at a nascent stage, and **licensing would act as a deterrent to entry of startups and smaller companies**, which are often the most innovative.
3. Over time, the lines between MVAS, the Internet, Broadband VAS, DTH VAS, and services on connected devices (from tablets to cars and refrigerators) will blur. Any initiatives from the authority must take this into account a future scenario, and a situation of **Digital Ubiquity**: please view these services as being delivered over Internet Protocol, and not by platform company or access service provider. Digital Ubiquity is the future, and companies are Digital Service Providers/MVAS company, of which MVAS and the World Wide Web are mediums for the delivery of these services.
4. The TRAI's objective must be to create an open and competitive market. We would request the authority to initiate steps to break existing cartels, **ease setting up of new businesses and unshackle these Digital Service Providers/MVAS companies**. This can be done by focusing on three changes:
    a. **Separation of ownership from provisioning:** At present, Digital Service Providers/MVAS companies do not own the short codes they operate, which leads to confusion, and low investment in marketing, since they do not own a singular identity. Separate the identity (short code) of the Digital Service Provider/MVAS company from provisioning by Access Service Provider/Telecom Operator by creating a **Common Short Code Registry**, governed by a Common Short Code Registrar.
    b. **Separate billing for services/content from access charges**, to bring transparency and standardization in consumer billing, and independence for the Digital Service Provider/MVAS company from Access Service Provider/Telecom Operator. We would recommend the removal of the existing revenue share mechanism as a means to ensure ubiquitous pricing mechanisms across digital platforms.
    c. **Enforce provisioning of independent mechanism for verification of billing**, in order to address MIS issues, and bring billing for content and services in line with Mobile and

Online Banking guidelines from the Reserve Bank of India, and payment gateway /prepaid card regulations.

We have expanded in detail below, on the rationale behind each suggestion, and the benefits to both the digital ecosystem and the consumer in response to the authority's questions.

Responses to specific questions

Q1. Whether the current provisions under various licences (UASL, CMTS, Basic and ISP) are adequate to grow the MVAS market to the desired level? If not, what are the additional provisions that need to be addressed under the current licensing framework?

MediaNama's Response:

On the outset, we would request that the authority take note of the following developments in the digital space:

1. Globally, the lines between the mobile and Internet businesses are blurring: **online businesses**, through mobile applications and web-apps **are increasingly going mobile**. As such, apart from a few limited services like Caller Ringback Tones, all services that are available on the mobile can easily be provisioned through the Internet. Additionally, online[1] and mobile businesses[2] are also providing services on DTH. Google, the largest Internet company in the world, has recently acquired Motorola Mobility, the inventor of the cellular phone, and a company with devices in both mobility and home (Set Top Boxes, Connected TVs) businesses[3].
2. Internet businesses now constitute some of the largest businesses across the globe. Google and Apple have become among the largest businesses in the world through provisioning of digital services and/or connected products. This is an industry that is typified by innovation. None of these businesses are regulated through licensing, and have innovated in an open and competitive environment.
3. Mobile Value Added services companies, in their present format, are essentially vendors. In a majority of the cases, there is no direct to consumer interface, and most of the services provisioned by these companies are recognized by consumers as services of telecom operators, and not of the service providers.
4. Telecom operators are already subject to licensing and regulation, and the services being provisioned by Mobile Value Added Services companies for them are already governed by the current licensing regime, which governs telecom operators.

[1] Services On Airtel DTH: Indiatimes Shopping, MakeMyTrip, WorldSpace, MapUnity, AskLaila, StarsTell, October 7th, 2008
http://www.medianama.com/2008/10/223-services-on-airtel-dth-indiatimes-shopping-makemytrip-worldspace-mapunity-asklaila-starstell/
[2] Hungama Inks Tata Sky DTH Gaming Deal; Yuvraj Singh Cricket Championship, September 23rd, 2010
http://www.medianama.com/2010/09/223-hungama-inks-tata-sky-dth-gaming-deal-yuvraj-singh-cricket-championship/
[3] Google To Buy Motorola Mobility For $12.5Bn; Beyond Handsets, August 15th, 2011
http://www.medianama.com/2011/08/223-google-motorola-mobility/

5. Many MVAS services, given the growth of platforms, the evolution of consumer electronics and the availability of wireless broadband, will eventually also power communications and content on television sets (through Internet enabled Set Top Boxes), in cars or even refrigerators. Digital Ubiquity is the future, and any approach to regulation must take this into account.
6. Venture Capital investment in the Internet segment far exceeds that in the Mobile Value Added services segment. Venture Capitalists have told us that this is because Mobile Value Added Services companies are often not in control of their own fortunes, and are much too dependent on Telecom Operators, which restricts their freedom to innovate (services have to be approved by telecom operators), and prevents the entry of smaller players. Most investments have either been made in already well established MVAS companies, or in MVAS companies set up by former telecom operator executives. At the same time, we've been told by MVAS companies that telecom operators do not want any single player to become too big.

   At present, the mobile service delivery ecosystem operates in the form of mini monopolies: the access service provider/Telecom Operator owns both access to consumer and billing integration, and **it is a collection of closed ecosystems, and this environment limits the potential for investment and growth.**

7. When it comes to regulation, with growth in digital services, whether education or health, the departments best suited to govern them are the departments which already look into these matters. For example, in India, the insurance regulator IRDA is looking into the practices of web based insurance aggregators[4], and if the domain does grow, will undoubtedly look at similar aggregators on the mobile. Similarly, in the United States of America, the Food and Drug Administration is looking into matters concerning Medical Mobile Applications[5].

We would recommend that the authority view Mobile Value Added services as a subset of Digital Services, and mobile content as Digital Content, instead of through the limited lens of the platform that the content and services are delivered on; essentially, **view carriage/access separate from content and services.** We would recommend that the **TRAI should limit its regulation to access/carriage**, and not extend it to services, and leave the regulation of specific critical services like education and health to that segments industry regulator. This will **prevent any potential discord between regulators over turf.**

Thus we believe that it **would be detrimental for the TRAI to recommend licensing of Mobile Value Added Services, or any digital services.**

Additional provisions in telecom licenses that need to be addressed

One key failing of the licensing of telecom operators is that license fees are charged as a function of gross revenue, which includes voice, data and VAS. Because of this, **customers end up being charged**

[4] IRDA Draft Guidelines Will Limit Indian Web Insurance Aggregators, MediaNama, April 1st 2011
http://www.medianama.com/2011/04/223-irda-draft-web-aggregator-guidelines-india/

[5] US FDA Issues Draft Regulatory Guidelines For Mobile Medical Apps, MediaNama, July 25th 2011
http://www.medianama.com/2011/07/223-us-regulator-mobile-medical-apps/

extra for purchasing digital content and services on mobile, as opposed to other platforms like the Internet, or physical retail.

In a future-ready, ubiquitous regime, **the licensing conditions need to be changed to ensure that the access business is treated separately from content and VAS**, in order to enable the separation of billing of access from billing of content and services.

Q2. Is there a need to bring the Value Added Service Providers (VASPs) providing Mobile Value Added Services under the licensing regime?

MediaNama's Response:

As explained above, we would not recommend bringing Value Added Service Providers (VASPs) providing Mobile Value Added Services under the licensing regime. In our view:

- TRAI should regulate the access of VAS services by regulating access service providers like Telecom operators. It should similarly regulate VAS services on other platforms like DTH and IPTV by regulating DTH operators and ISPs.
- TRAI should not regulate specific services like m-Health and m-Education – these are best left to their respective regulators

Q3. If yes, do you agree that it should be in the category of the Unified Licence as recommended by this Authority in May 2010? In case of disagreement, please indicate the type of licence alongwith the rationale thereof.

MediaNama's Response:

As explained in response to question 1, we would not recommend bringing Value Added Service Providers (VASPs) providing Mobile Value Added Services under the licensing regime.

Q4. How do we ensure that the VAS providers get the due revenue share from the Telecom Service providers, so that the development of VAS takes place to its full potential? Is there a need to regulate revenue sharing model or should it be left to commercial negotiations between VAS providers and telecom service providers?

MediaNama's Response

We believe that the current revenue share regime is broken, and the manner in which customers are billed for services lends itself to opacity, cartelization on prices among mobile operators and lack of freedom for the VASP in providing services. I would refer the authority to three points in this regard:

- Viren Popli, former SVP (Mobile) for STAR India had said a few years ago that telecom operators are "**like a toll gate that is determining a revenue share on the basis of the value of the goods that go through.**" The lack of standardization of billing means that every digital service provider/MVAS company has to enter into negotiations on revenue share with telecom operators, just to be allowed to provide MVAS services to the end customer.
- Popli had also added that "**If you have ever dealt with mobile operator, you will know that after your meeting ends with one operator, every mobile operator knows what you're talking about."** [6]Thus, telecom operators often operate in the form of a **cartel**, and instead of a business that merely provisions services to subscribers, it inhibits open market operations of competitive pricing.
- OnMobile CEO Arvind Rao recently said during the company's first quarter conference call[7] with reference to its RingBack Tones product, that it has "been saying they (Telecom Operators) should drop the rates in a segmented manner in order to penetrate the market". What this also suggests is that pricing is largely determined by telecom operators, which **restricts the freedom of independent businesses to price MVAS services**, and adversely impacts growth.

We would strongly recommend:

1. The **separation of charges for digital services and content from those for access services:** at present, if a customer goes through a telecom operator, the cost of purchase is much higher than if the same product is purchased on the Internet directly or via retail. This is, in part, because the access service provider/telecom operator ends up paying a license fee to the government on non-voice, non-access based transactions. **The consumer is thus charged a blended rate**, which is a combination of two types of charges – firstly, **an access charge** for allowing the customer to access the service, and a **separate content/service charge** for allowing the customer to use the service or purchase the content.

   However, there is no standardization of access charges, or any communication to the customer which separate rates mentioned for access and content/service. Content owners and MVAS providers are instead charged a "revenue share", which is arbitrary figure based on negotiations between the telecom operator and MVAS provider/Content owner. Thus there are different revenue shares for different types of content from different content providers, instead of having an access charge, a transaction fee for billing and finally, a content/service fee for the content/service purchased. **This lack of standardization and transparency in transaction fees, access fees and content/service fee will prevent the growth of mobile commerce through telecom operator billing mechanism.**

   We would **recommend that the authority mandate that telecom operators to do the following**:

[6] @ MoMo Mumbai: "Don't Compare The US Market For VAS To The Indian Market", Says Viren Popli, SVP & Head (Mobile Ent), STAR India; August 20th, 2008
http://www.medianama.com/2008/08/223-momo-mumbai-dont-compare-the-us-market-for-vas-to-the-indian-market-viren-popli-svp-mobile-for-star-india/
[7] OnMobile Global Q1-FY12 Conference call transcript
http://onmobile.com/docs/2012/q1/Investor_Conference_Call_Transcript.pdf

1. Standardize billing of customers for access to content and services, applicable across services
2. Standardize a transaction fee (similar to a banking transaction fee) for all purchases of content/services, which is not on a revenue share model.
3. Allow telecom operators to set their own access fees, but mandate the communication to customers of all three charges: access fee, service/content price and transaction charge, with each transaction.

We strongly believe that the **revenue share regime needs to be dismantled, and it works against the interests of the consumer**.

Bharti Airtel has taken a step in this direction, with the launch of Airtel Money services, wherein customers can store money on the mobile, and use it to make purchases that are independent of their telecom prepaid account[8].

Additional Benefits

- By separating charges for content and services from access (voice and non-voice) services, you would end up giving the customer **a single content/service price across multiple payment options**, across multiple platforms, and separate charges for access/download. This will ensure that the **revenue earned by the Digital Service Provider/MVAS company post transaction remains the same, across platforms**, or allow the Digital Service Provider/MVAS company to change the pricing of his service, keeping in mind the access charges, in order to provide a single price across platforms to the customer. This freedom will encourage more companies, especially Internet companies, to look at mobile as an option.
- By separating the cost of access from cost of service/content, you can ensure that the access service provider/telecom operator **gets paid a standard amount for the access service** (as per a fixed-line-broadband or a pay-per-use-3G-data plan), and the content owner/service provider **gets paid separately for the service/content.** This leads to a separation and independence of the services business from the access business even for telecom operators. Please note that organizations like Bharti Airtel are already restructuring[9] to separate consumer businesses from market operations (access).
- Allow Digital Service Providers/MVAS companies to offer **multiple billing options to customers**, and it allows for competition among payment service providers, in terms of transaction fees. Customers have the convenience of paying via Prepaid balance, Postpaid billing, Cash Cards (like Itz Cash, Done Card, Oxi Cash, Airtel Money), Interbank Mobile Payments Service (has 23 banks) as well as Credit and Debit cards with Mastercard, Visa or NCPI, instead of the mini-monopoly /cartel situation that currently exists on mobile, where the telecom operator billing exists.

  Separating billing from access can allow a customer to access a service on mobile, but pay using (for example) a credit card, an independent cash card or his fixed-line telephone bill. This makes

[8] Airtel Launches Airtel Money: Prepaid Cash On Mobile; Charges, Transaction Limits; January 31st, 2011 http://www.medianama.com/2011/01/223-airtel-money-prepaid/
[9] Bharti Airtel Restructures India & South Asia Operations, MediaNama, July 12th 2011 http://www.medianama.com/2011/07/223-bharti-airtel-restructures-india-south-asia-operations/

billing independent of access. In addition, **it allows the customer other options of payment for a service, if there is a limited balance on his prepaid mobile.**

2. **Provide verification of billing:** apart from separating billing from access, it is important to put in place a regulatory regime for verification of purchases. For digital payments, the Reserve Bank of India has put into place two mechanisms
    a. Online, there is a two factor authentication system, which involves going through bank gateways for completion of payment and using NetBanking or either of Verified by Visa or Mastercard Secure to make the payment.
    b. On mobile, there is an Interactive Voice Response system for verification of payment on mobile.

We would recommend the TRAI direct telecom operators to institute an IVR based second factor of authentication of purchase in case of MVAS, especially if the customer's Prepaid balance is deducted. Instead of the One-Time-Password mechanism that the Reserve Bank of India has recommended, the TRAI can also consider a simpler alternative: Press 1 to Confirm, or Press 0 for cancellation.[10]

Additionally, following the separation of Access Charges from Charges for Services and Content (see Q4 for details), telecom operators should be directed to operate billing for content and VAS in the same manner as payment gateway service providers / prepaid payment instrument service providers, and **hence settle within two-three days**.

The RBI guidelines[11] state:

> i. All payments to merchants which do not involve transfer of funds to nodal banks shall be effected within a maximum of T+2 settlement cycle (where T is defined as the day of intimation regarding the completion of transaction).
> ii. All payments to merchants involving nodal banks shall be effected within a maximum of T+3 settlement cycle.

The RBI guidelines treat payment companies as intermediaries and which are "all entities that collect monies received from customers for payment to merchants using any electronic/online payment mode, for goods and services availed by them and subsequently facilitate the transfer of these monies to the merchants in final settlement of the obligations of the paying customers."

In our view, **since they collect monies from customers for payment to merchants using electronic payment mode, telecom operators are already governed by these guidelines.**

Benefit: While this might initially hinder some customers from making payments on the mobile, we believe that adopting an IVR based mechanism will lead to a record being kept of the confirmation of the transaction, and a reduction in false billing. An IVR mechanism will also ensure that those mobile

[10] Banks Test One Time Password For Tele Payments In India; RBI Extends Deadline, MediaNama, January 3rd 2011 http://www.medianama.com/2011/01/223-banks-test-one-time-password-for-tele-payments-in-india-rbi-extends-deadline/
[11] http://rbidocs.rbi.org.in/rdocs/notification/PDFs/DOIPS241109.pdf

customers not familiar with English can make purchases via mobile, since confirmation via SMS is restrictive. Verification will also give customers more confidence to subscribe to services.

Additionally, by enforcing RBI regulations regarding settlement of payments following transactions, by ensuring that **money from purchase of content/services is kept separately from access charges**, the likelihood of telecom operators retaining money a separate float, or making delayed payments, will reduce, apart from addressing MIS issues.

Q5. At the same time, how do we also ensure that the revenue share is a function of the innovation and utility involved in the concerned VAS? Should the revenue share be different for different categories of MVAS?

MediaNama's Response:

We believe that **the revenue share regime needs to be dismantled, and a standardization** of two types of charges needs to be enforced: **access charges** for providing the consumer access to the content, or the ability to download content; **and transaction fees, for completing the transaction.** The third element – the pricing of content and services - needs to be treated separately, for ensuring ubiquity of pricing across platforms (broadband, mobile, wireless broadband, physical retail), but left to the discretion of the Digital Service Provider/MVAS company.

Additionally, telecom billing for provisioning of VAS needs to be treated as a transaction service, covered by RBI regulations regarding payment gateways. This will ensure transparency of billing. We've explained this in detail in the response to Q4.

Q6. Do you agree that the differences come up between the MIS figures of the operator and VAS provider? If yes, what measures are required to ensure reconciliation in MIS in a transparent manner?

MediaNama's Response:

Please see the response to Q4, Re: verification of billing, and the treatment of transactions and non-voice services (apart from cost of access) the same way as services provided by Payment Gateway service providers or Prepaid card companies.

Q7.

- ***(i) Does existing framework for allocation of short codes for accessing MVAS require any modifications? Should short codes be allocated to telecom service providers and VAS providers independently? Will it be desirable to allot the short code centrally which is uniform across operators? If yes, suggest the changes required along with justification.***
- ***(ii) Should there be a fee to be paid for allotment of short code?***

MediaNama's Response:

Yes, short code services need to be made independent of telecom operators, and allocated by an independent body on a first come first serve basis, at an affordable price, **to ensure ease and low cost of starting a business**. This will enable Digital Service Providers/MVAS company to have a separate access identity point for services, similar to the domain name regime that exists on the Internet.

We strongly believe that the **ownership of identity needs to be separated from the provisioning of access.**

At present, short codes are owned by the access service providers/telecom operators on mobile. For example, even through Indiatimes 58888 is a well known brand from the Times of India group, the 58888 short code for Airtel customers is owned by Airtel but licensed to Indiatimes. Similarly for Vodafone customers, 58888 is owned by Vodafone, but licensed to Indiatimes. The same agreements apply to Tata Docomo and other telecom operators.

This means that if any startup wants to create a similar short code brand for providing services, it needs to license the same short code with each mobile operator – which is a difficult task - and even then, it is not guaranteed ownership. Also, Digital Service Providers/MVAS companies are forced to host their services with each and every mobile operator for being able to provide these services to customers. Often, they end up owning different short codes across different telecom operators, which can be confusing for customers.

At a Mobile Monday event in Mumbai in 2008, OnMobile Global CEO Arvind Rao had pointed out the need for **a single point window for short codes**, so that the short code is operational within 30 days on all operators; a central point for getting connectivity and access for off-deck services. Viren Popli, then the SVP & Head of Mobile Entertainment for STAR, had said that **it used to take 2 years to get a short code from BSNL at one point in time**, and that even when a short code is given, **one still does not get connectivity**, and had to fly around the country to meet with different circle heads to get it activated. This, he pointed out, adds tremendous cost to a startup. "Imagine what will happen when you have to deal with 20 mobile operators" he had said.[12]

In comparison, in an open and competitive ecosystem, the identity is owned by the digital service provider/MVAS company, and not the access service provider/ISP/telecom operator. On the Internet, an **Internet Domain Registry exists, and through a common Domain Name System (DNS), it points the domain name to the right IP Address.** Servers for provisioning digital services (and hosting websites) are typically hosted independently of ISPs. Domain names are as cheap as Rs 89 for the first year, and are independent of hosting, and independent of ISPs/Telecom operators. The cost of hosting a website can be as low as Rs 500 per month.

We believe that the same must apply to short codes: a **Common Short Code Registry** should be created, and through a **Domain Name System (DNS)**, point the short code to the service independently owned and operated by the Digital Service Provider/MVAS company. The Registry must have a simple and affordable online or mobile payment mechanism for enabling ownership of identity, managed by a **Common Short Code Registrar**.

[12] @MoMo Mumbai: Things To Do, Short Codes, Safe Harbor, Bikini Content, August 20th, 2008 http://www.medianama.com/2008/08/223-momo-mumbai-things-to-do-short-codes-safe-harbor-bikini-content/

Benefits:

- Allows Digital Service Providers/MVAS companies to own their identity (common short code), and not be dependent on, or beholden to, mobile operators for renewal of contracts
- Like an online domain registry, allow anyone to buy a short code and/or long code, and launch a service across telecom and fixed line operators. This will lead to many more services being provisioned on voice, leading to greater innovation and competition.
- **Help make provisioning of services ubiquitous:** allowing Digital Service Providers//MVAS companies to provide services across platforms. Many independent online businesses are currently wary of going mobile because of limitations of short codes and having to deal with telecom operators. A common short code regime will enable the easy entry of startups into the MVAS segment, allowing them a convenient and easy method of launching services, without the bureaucratic hurdles posed by telecom operators.

Q8. Is there a need to provide open access to subscribers for MVAS of their choice? If yes, then do you agree with the approach provided in para 2.46 to provide open access? What other measures need to be taken to promote open access for MVAS? Suggest a suitable framework with justifications?

MediaNama's Response:
We've given our recommendations on open access for MVAS in the response to question 4, 5 and 7.

Q9. What measures are required to boost the growth of utility MVAS like m-commerce, m-health, m-education & m-governance etc. in India? Should the tariff for utility services provided by government agencies through MVAS platform be regulated?

MediaNama's Response:

- Tariff for utility services by government agencies and their vendors should be regulated to ensure a reasonable pricing for consumers.
- We are **strongly opposed to any price regulation of the private sector**, since this could adversely impact the entry of smaller companies with unique and innovative services.
- **We are also opposed to any regulation of digital services by the TRAI.** This should be, as we had explained in our response to Q1, left to specific government departments: m-education should be governed by the ministry of education; m-health should be regulated by the department of health.
- By enabling transparency in the MVAS space and by instituting measures mentioned below in response to Q 10, we believe that there will be sufficient incentive for the growth of MVAS, and services like m-commerce, m-health and m-education, as well as attracting external investment and startups to this business.

Q10. Any other suggestions with reasons thereof for orderly growth of mobile value added services?

Our framework for an Open, Competitive and Flourishing Digital Services Ecosystem would be structured as follows:

It hinges on three key changes, as explained earlier:

a. Separation of ownership of identity of the Digital Service Provider/MVAS company from provisioning by Access Service Provider/Telecom Operator by creating a **Common Short Code Registry**, governed by a **Common Short Code Registrar**. At present, Digital Service Providers/MVAS companies do not own the short codes they operate.
b. **Separate billing for services/content from access charges**, to bring transparency and standardization in consumer billing, and independence for the Digital Service Provider/MVAS company from Access Service Provider/Telecom Operator. We would recommend the removal of the existing revenue share mechanism as a means to ensure ubiquitous pricing mechanisms across digital platforms.
c. **Enforce provisioning of independent mechanism for verification of billing**, in order to address MIS issues, and bring billing for content and services in line with Mobile and Online Banking guidelines from the Reserve Bank of India, as well as regulations governing payment service providers.

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About MediaNama

MediaNama (www.medianama.com) is the premier source of information and analysis on the Telecom and Digital Media business in India. Our content attracts a readership of decision makers from the digital content and services space, spanning Internet, Mobile, Internet, Media, Entertainment and Gaming domains within India, and as well as those looking to invest or set up operations in India's emerging Telecom and Digital Media market.

We focus on business deals, and developments which are important for key decision makers in the Digital Media and Telecom space, covering Government Policy and Regulation, M&A, Joint Ventures, VC and PE Funding, Industry Research & Metrics, DRM and Intellectual Property related issues, and financial results on public listed companies within this space.

We pay special emphasis to emerging segments like Video Content, Mobile Value Added Services, Indian Language Content, IPTV, Mobile TV, 3G, Digital Rights, Location Based Services, Mobile TV and Mobile Banking and Payments.

Contact:

Nikhil Pahwa,
Editor & Publisher, Mixed Bag Media Pvt Ltd
20 A Rajpur Road, Civil Lines, Delhi-110054

Email: nikhil@medianama.com
Phone: +91-98103-10053