



Comments from Amagi Technologies Pvt. Ltd on,

Consultation Paper on DTH Issues relating to Tariff Regulation & new issues under reference, dated March 06th 2009.

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Section-wise comments

Section 6.1.5 (h)

DTH being an addressable platform has immense scope for targeted advertising, which would be extremely beneficial to all of TV audience, advertisers, broadcasters and DTH operators. By targeting specific audience in geography or a specific demographic profile, advertisers experience less spillage in reaching their target audience. Target audience receive more relevant advertising. Broadcasters would be able to charge a premium from advertisers for better targeting, and DTH operators shall be able to get additional revenue for providing addressable infrastructure to reach target audience.

In this context, it is suggested that DTH operators be allowed to create, sell and carry advertisements on their platform, for both their content as well as regular broadcast channel content.

It is to be appreciated that there could be content from regular broadcast channel that would have some advertisements as part of the content to be broadcast as is, and some “spots” allocated for ads to be inserted by the DTH operator.

This initiative is suggested not to come as part of the “must provide’ clause in Interconnection Regulation, as the commercial needs of the broadcaster needs to be met by DTH operator, if the content is to be provided without advertisement. This commercial implication of advertisement revenue does not come under the preview of the Interconnection Regulation.

Section 5.4.1

As described in detail, in section 4.4 it is clear that carriage fee should be a market regulated price, depending on variety of factors including spectrum availability for the DTH operator, operator expenses, number of channels needing DTH operator services and the perceived demand of that channel on the DTH platform as determined by the DTH operator.

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Section 5.4.2

There has been a major issue of sky rocketing carriage fees on DTH platforms, which makes a lot of broadcaster's business model unviable.

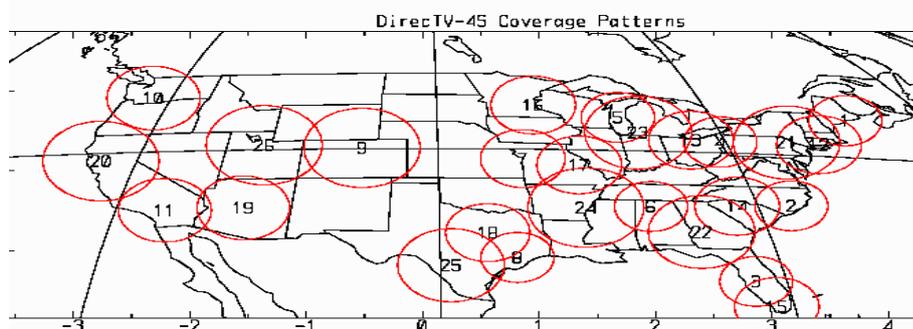
Often spectrum availability is the cited constraint for this increased fee structure, as the demand for spectrum is much higher than the available bandwidth.

There have been technologies in US and Europe that have solved this problem very effectively. **"Spot beam" is a satellite technology that allows re-using of the same spectrum frequency in different regions for different broadcast content.** This is accomplished using specialized antenna on satellites that focus the radio frequencies in different regions, instead of beaming it across the country.

This allows in theory for the same frequency to be used to provide an Assamese channel in NE region, Tamil channel in South India and a Bhojpuri channel in the North-West of the country on the same spectrum frequency.

This would allow regional broadcast channels an option to come on DTH platform at a lower price specifically for their regional need (no national footprint). Given the number of regional channels in India this is an important technology that DTH operators should embrace to efficiently utilize DTH spectrum for a lower cost of distribution for multitude of regional channels.

In the US DirecTV and EchoStar have successfully deployed "spot beam" since 2002 for beaming local channels to different regions in the United States.



Beam	Transponders	FCC Defined Markets			
1	28	Boston			
2	28	Raleigh			
3	20 & 28	Orlando	Tampa		
4	28	Pittsburgh			
5	18 & 28	Milwaukee	Chicago		
6	18 & 28	Nashville	Birmingham		
7	28	Kansas City			
8	28	Houston			
9	4 & 12	Denver			
10	18 & 28	Seattle	Portland		
11	18 & 28	Los Angeles	San Diego		
12	4 12 20	New York	Philadelphia		
13	4 12 20	Detroit	Cleveland	Cincinnati	Columbus
14	4 12 20	Charlotte	Green/Ash	Winston/Sa	
15	12 & 26	Miami	W.Palm B		
16	12 & 20	Minn/St P			
17	20	St Louis			
18	12 & 20	Dallas	Austin		
19	20	Phoenix			
20	4 12 20	San Francisco	Sacramento		
21	18 & 26	Washington	Baltimore		
22	26	Atlanta			
23	26	Indianapolis			
24	4	Memphis			
25	26	San Antonio			
26	26	Salt Lake C			

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It is suggested that to reduce the demand for spectrum and hence the drop in carriage fee prices, DTH operators shall be mandated to have at least FOUR transponders to support “spot beam” antenna, so as to provide a cost-effective “regional” spectrum bandwidth for regional broadcasters whom so wishes a regional footprint at a reduced price.