RESPONSE OF DISH TV INDIA LIMITED
TO
CONSULTATION PAPER
ON
ISSUES RELATING TO UPLINKING AND DOWNLINKING
OF
TELEVISION CHANNELS IN INDIA

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Submitted by

Ranjit Singh
e-mail: ranjitsingh@dishtv.in

PRELIMINARY RESPONSE

The Ministry of Information and Broadcasting, Government of India notified the "Guidelines for Uplinking from India" in July 2000 which was followed by "Guidelines for Uplinking of News and Current Affairs TV Channels from India" in March 2003 (later amended in August 2003). Further followed by "Guidelines for use of SNG/DSNGs" in May 2003 and addendum dated 1.4.2005 to the Uplinking guidelines. The Government has, on 20th October 2005, further amended these Guidelines, which came into effect from 2nd December 2005. Some amendments to these Guidelines have also come into operation as a result of enactment of the Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharti) Act, 2007 and the rules and notifications thereunder. Some amendments were also needed in the provisions relating to the determination of the foreign investment in the applicant/permission holder company to bring them in line with the extant FDI Policy of the Government. The Government has, on 7th October 2011 further amended these guidelines. Accordingly, in supersession of all previous guidelines, the Government notified the consolidated Uplinking Guidelines which came into effect from 05th December, 2011. Similarly the Ministry of Information and Broadcasting also formulated policy guidelines for downlinking all satellite television channels downlinked / received / transmitted and re-transmitted in India for public viewing. The said guidelines were notified on 11th November 2005 which was later superseded by the revised set of policy guidelines which were notified on 5th December 2011.

A bare perusal of the uplinking and downlinking guidelines would reveal that the same is followed purely as a matter of procedure and does not have its genesis to any enactment/statute. Though the Authority has clarified in the Consultation Paper under reply that the permissions issued under policy guidelines for uplinking and downlinking of TV channels comes under the ambit of Section 4 of the Indian Telegraph Act, 1885, the guidelines itself do not enunciate the same and in the absence of the same, the guidelines do not get the teeth of law.

It is thus suggested that the above fact should clearly be mentioned in the guidelines so as to make it more effective in the same manner as it is followed in the case of DTH.

As regards the issue regarding the definition of 'News and Current Affairs channels' and 'Non-News and Current Affairs Channels', the necessity felt regarding amendment of the said definitions is a welcome step. However before undertaking any such amendment, it is imperative for TRAI to take into consideration the fact that without defining the term 'Channel', the definitions under consideration would be a futile exercise. It is noteworthy that the term 'Channel' has been a critical miss

in all the regulations and tariff orders issued by TRAI since the year 2004 when Central Government entrusts regulatory functions relating to broadcasting and cable TV sector to TRAI vide its notification dated 09.01.2004.

Therefore to understand the genesis and meaning of the term 'channel' recourse may be had to the definition of 'telegraph' in the Indian Telegraph Act, 1885 which is as under:

> *"3(1AA) 'telegraph' means any appliance, instrument, material or apparatus used or capable of use for transmission or reception of signs, signals, writing, images and sounds or intelligence of any nature by wire, visual or other electro-magnetic emissions, radio waves or Hertzian waves, galvanic, electric or magnetic means.*
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> *Explanation.—'Radio waves' or 'Hertzian waves' means electromagnetic waves of frequencies lower than 3,000 giga-cycles per second propagated in space without artificial guide;"*

Further, the definition of "Telecommunication services" as provided in TRAI Act, 1997 provides as under:

> *2(k) "telecommunication service" means service of any description (including electronic mail, voice mail, data services, audio tex services, video tex services, radio paging and cellular mobile telephone services) which is made available to users by means of any transmission or reception of signs, signals, writing, images and sounds or intelligence of any nature, by wire, radio, visual or other electro-magnetic means but shall not include broadcasting services:*
>
> *PROVIDED that the Central Government may notify other service to be telecommunication service including broadcasting services.*

It is a matter of record that exercising its powers under the above, the Central Government vide its notification no. S.O.44(E) dated 09.01.2004 notified the broadcasting services and cable services to be 'telecommunication service'.

It is thus clear that the above definitions does not differentiate between the different modes of dissemination of content including but not limited to *signs, signals, writing, images, teletext, and sounds or intelligence of any nature* and includes in itself all modes of distribution and therefore all the entities engaged into the business of channel and content distribution in any manner whatsoever should be brought under the same terms and conditions. In other words, the definition is

"technology agnostic" and therefore each and every distribution of content through telegraph should be treated equally.

Despite such a clear position as regards to what would constitute a 'Channel", what was defined by TRAI was 'Free-to-air' channel and 'pay channel' and the amendments made into the said definitions were only by keeping in consideration the commercial aspect of the same and leaving aside the technological aspect.

Before amendment:

"free to air channel" means a channel for which no fees is to be paid to the broadcaster for its retransmission through electromagnetic waves through cable or through space intended to be received by the general public either directly or indirectly;	**"pay channel"** means a channel for which fees is to be paid to the broadcaster for its retransmission through electromagnetic waves through cable or through space intended to be received by the general public either directly or indirectly

After amendment:

"free-to-air channel" or **"free-to-air television channel"** means a channel which is declared as such by the broadcaster and for which no fee is to be paid by the distributor of television channels to the broadcaster for signals of such channel;	**"pay channel"** means a channel which is declared as such by the broadcaster and for which a share of maximum retail price is to be paid to the broadcaster by the distributor of television channels and for which due authorization needs to be obtained from the broadcaster for distribution of such channel to subscribers;

Clearly therefore, in its attempt to re-define the aforementioned terms, the TRAI has deviated from the technical aspect associated with the said term and has transformed the definitions more in the commercial nature. While this has given a unilateral edge to the broadcasters to disseminate their content in such manner as they deem fit and thereby derived huge benefit out of the same, this has also resulted into huge void in the industry. One must realize the fact that there are various modes through which the contents are being disseminated by the content owners and all of which qualify to be called as a 'channel'. For example, there can be cable owned channel, fibre playout, cloud channel, website news channel etc. etc. etc. and in the absence of a clarity in this regard, unilateral benefit is being accorded to the

broadcasters while leaving all other stakeholders in the value chain as subjects at hands of such broadcasters.

This is all the more required because much water has flown after TRAI assumed the role of the sectoral regulator and the technological advancements in almost every sector of life including but not limited to entertainment and media has changed the way the things were looked into and perceived even a decade ago. For example, nobody could consider a mobile handset as an alternative to television and content so widely and variedly available at the click of a button.

The Broadcasting is a fast paced industry with technical changes taking place regularly with a high speed. Regulations governing such industry can be successful only when the Regulator is able to catch up with all such changes and make necessary amendments in the Regulations to make the same all pervasive. We therefore request the Authority to kindly keep this under consideration while sending its recommendation to the Ministry of Information and Broadcasting.

On the next aspect of processing fee for application, we would like to submit that under the uplinking / downlinking guidelines for Indian uplinked channels or uplink from foreign soil, in substance, the broadcasters carry out the activity of propagation of content through airwave (sky wave) on a permitted frequency to the designated satellite and then the same channel are downlinked from the said satellite to designated teleport in form of reception right to a third party. Similarly, a DTH operator carries out activity of transmitting the received content through carrier waves on a permitted frequency to a designated satellite and thereafter making it available to the viewers for the purpose of reception. Thus in substance the activity carried out by the broadcasters and DTH operator is same. Both of them transmit the signal through a satellite and make them available for the purpose of reception. In this aspect both stand in the same category. Therefore there should not be any discrimination between the license fee payable by the broadcasters and the DTH operators. This becomes all the more required in view of the acknowledgement on the part of TRAI that the permissions issued under policy guidelines for uplinking and downlinking of TV channels comes under the ambit of Section 4 of the Indian Telegraph Act, 1885. It is noteworthy that DTH License is also granted under the very same provision. In this regard, it is also important to note that under the recently notified Interconnection Regulations & Tariff Order (which are under challenge) the TRAI has clarified that a Distribution Platform Operator is only providing a platform to the Broadcaster to distribute the Channels of the Broadcaster. The DPO's will merely be collecting the subscription revenue for and on behalf of the Broadcaster and accordingly, to this extent, is a "collection agent" for the Broadcaster.

In view of the above, we provide as under our response to the limited issues raised by the Authority in the present consultation paper but with a hope to widen the ambit of the consultation:

4.1. Is there any need to redefine "News and Current Affairs TV channels", and Non-News and Current Affairs TV channels" more specifically? If yes, kindly suggest suitable definitions of "News and Current Affairs TV channels" and Non-News and Current Affairs TV channels" with justification.

Response: In view of the submissions made hereinabove, we would like to reiterate that before re-defining the terms "News and Current Affairs TV channels", and Non-News and Current Affairs TV channels", the term 'channel' should be defined exhaustively in order to cover all means and methods to provide the channel as well as the various variants of the Channel.

4.4 Is there any need to increase the amount of non-refundable processing fee to be deposited by the applicant company along with each application for seeking permission under uplinking guidelines, and downlinking guidelines? What should be the amount of non-refundable processing fee? Please elaborate with justification.

4.9 Can there be better way to grant license for TV satellite channel then what is presently followed? Give your comments with justification?

4.10 If it is decided to continue granting of licenses for satellite TV channels on administrative basis, as is the case presently, what should be the entry fee for grant of license for uplinking of TV channels from India, downlinking of TV channels uplinked from India, and downlinking of foreign TV channels? Please suggest the fee amount for each case separately with appropriate justification.

4.11 What should be the license fees structure, i.e. fixed, variable, or semi-variable, for uplinking and downlinking of satellite TV channels? Please elaborate if any other license fee structure is proposed, with appropriate justification.

4.12 If the variable license fee structure is proposed, then what should be rate of license fee for TV channels uplinked from India and TV channels uplinked from abroad, and what should be the definition of AGR?

4.13 If the semi-variable license fee structure is proposed, then what should be the minimum amount of license fee per annum for domestic channels (uplinked and downlinked in India), uplink only channels, and downlinking of foreign channels (uplinked from abroad)?

4.14 If the fixed license fee structure is proposed, then what should be the license fee per annum for domestic channels, uplink only channels, and downlinking of foreign channels?

4.15 What should be the periodicity for payment of the license fee to the Government? Please support your answer with justification.

Response: Regarding the issues under reply, we would once again like to assert that as the first step, the Authority, as the Regulator of the entire sector covering all the stakeholders, should endeavour to remove all sorts of infirmity in the industry. The Regulator has to ensure a level playing field for all the stakeholders of the industry for a balanced growth of each one of them. It is thus stated that all the players should be imposed to same licensing terms as far as applicable. The License fee chargeable should be made uniform for all the players and the same should be subject to pass through items and deductions as has been reasonably incurred by the respective players.

Regarding the term of the License fee, we believe that the same should be 10 years, automatically renewable for a further period of 10 years unless any gross breach has been committed by any licensee in which case the renewal can be made subject to review by the Ministry or the Authority.

4.8 Is it advisable to restrict use of foreign satellites for satellite TV broadcasting or uplinking of satellite TV channels, to be downlinked in India, from foreign soil?

Response: We are of considered opinion that all sorts of discrimination and/or restrictions in the licensing conditions should be done away with. There should not be any differentiation of whatsoever nature between usage of Indian and foreign satellites and a player in the industry should be given the right to choose as to where it wants its signals to be beamed. Choice of Indian satellites may be made optional but no conditions of whatsoever nature should be imposed for submission of the said choice at the hands of ISRO/Antrix and pay for the same despite no value addition in the said chain. Needless to mention, such restriction should also be removed from the DTH industry.

4.17 Should all TV channels, i.e. pay as well as FTA satellite TV channels, be broadcasted through satellite in encrypted mode? Please elaborate your responses with justification.

Response: The Government as a matter of policy should immediately take steps to stop transmission of all channels in unencrypted mode. This will not only ensure curb on the leakage of content, which will result into more revenue generation in

the industry and ultimately to the Government, but the same will also have an impact of more transparent system reflecting actual subscriber base. There are many cable operators, hotels, restaurants, illegal platforms who are running the cable tv service without obtaining any license. Therefore transmission of encrypted channel is most advisable.

4.18 Is there a need to define the term "operationalisation of TV channel" in the uplinking guidelines, and downlinking guidelines? If yes, please suggest a suitable definition of "operationalisation of TV channel" for the purpose of the uplinking guidelines, and the downlinking guidelines separately.

Response: This should be same as the HITS policy.

4.31 Whether there is a need to restrict the number of teleports in India? If yes, then how the optimum number of teleports can be decided? Please elaborate your responses with justification.

Response: The number of teleport in India are two types. A channel owner installs its own roof top teleport whereas various others approach a common teleport service provider. The monitoring of all such teleport are done by DDG NOCC. The required equipment being the telegraph equipment or radio equipment are sold and easily available in the open market. It has been seen that many rooftop of teleport has been established which may not be under effective supervision of DDG NOCC. Therefore to effectively check the misuse, a common infrastructure of teleport licensing regime is more practical and advisable.

4.35 What specific technological and regulatory measures should be adopted to detect, and stop uplink of signals of non-permitted TV channels by any teleport licensee? Please elaborate your responses with details of solution suggested.

Response: Adequate measures of reporting and specifying the responsibility and effective implementation mechanism should be established.

4.36 Stakeholders may also provide their comments on any other issue relevant to the present consultation.

Response: We take this opportunity to highlight before the authority the long pending issues which has persistently been raised by Dish TV with a request that the same may be addressed in a fair and proper manner in order to provide level playing field to all the stakeholders in the industry.

DISPARITY METED OUT TO THE DTH INDUSTRY BY THE REGULATOR AND THE LICENSOR

Dish TV has repeatedly been highlighting the disparities in the Industry leading to absence of level playing field for the DTH operators due to heavy taxation on the DTH industry as well as the only entity in the entire value chain which is burdened with high license fee coupled with the practice of the broadcasters to pay huge amount to the MSOs as carriage fee or under different heads and thereby creating a visible and clear difference in the content cost.

Also, there is a huge discrimination in the licensing conditions as well. It a matter of common knowledge that TV Channels are distributed through various distribution platform operators (DPO) to the end consumers using various technologies, however, the content (TV Channel program) remains unchanged. In addition, all the DPO's are targeting and catering to the same "market", i.e., they are competing with each other for the same subscriber who receives the same channels from all the DPO's. The present regime for the license fee is discriminatory against the DTH Operators and is designed to provide the leveraged position to Cable Operator, HITS, IPTV, and MSO etc. in the market place as they are not required to pay any annual license fee. On account of such additional burden the DTH subscriber is discriminated who has to bear higher burden, compared to cable/HITS subscriber. The DTH industry has been raising this issue from the time the industry has come into being. It is a matter of record that in the month of March 2008, the Ministry of Information and Broadcasting had taken a decision to fix the License Fee @ 6% of the Gross Revenue which decision had the concurrence of the TRAI also. However, for reasons best known to the Government, the said decision is yet to be put into effect. The TRAI and the Ministry of Information & Broadcasting is well aware that the DTH has played a very critical role in making the Digitisation dream a success in addition to providing a world class experience to the consumers. Despite this, the DTH industry has always been accorded a step motherly treatment. There is an urgent need to remove these anomalies and create a level playing field for the DTH operator. Dish TV seeks the support of TRAI in rationalization of the License Fee so that even the DTH may be granted a level playing field which has all along been given step motherly treatment by the Government and the Authority.

We are aware that TRAI has come out with the recent tariff order and interconnect regulation which is aimed at re-structuring the entire industry. Though the said tariff order and the regulation are under challenge, however it is just a matter of time that when the new regulation will sail through these minor hiccups and become a reality.

As we are aware, the new regime proposes a structure where Maximum Price of the channels shall be fixed by the broadcasters. Effectively, now the channels and the bouquets will be offered by the broadcasters to the consumers at the rates declared by them and the distribution platforms operators including the DTH operators will only be a "pipe"/"network" through which these channels/bouquets will be offered to the consumers (akin to hawkers which is in the newspaper industry). The regulations also provide for the network charges which the DPOs can collect from the subscribers as well as the commission (collection charges) which will be paid by the broadcasters to the DPOs.

From the above, it is apparently clear that the subscription charges which the DPOs will collect from the subscribers shall only be 'for and on behalf of' the broadcasters. Accordingly, the DTH industry will act as a collection agent, qua the subscription charges. Such a collection being made by the DTH industry on behalf of the broadcasters certainly is a 'pass through' item for the purpose of determination of the license fee payable by the DTH operators to the Government of India.

It is important to note in this regard that on 01.10.2004, the TRAI issued recommendations on 'Issues relating to Broadcasting and Distribution of TV channels' where it recommended reduction in license fee to 8% of Adjusted Gross Revenue (AGR). The relevant extract of the said TRAI Recommendation is extracted hereunder:

> *"The principle of application of license fee on Adjusted Gross Revenue (AGR) as in the case of telecom may also be followed. The AGR in case of DTH service should mean total revenue as reflected in the audited accounts from the operation of DTH as reduced by*
>
> *(i) Subscription fee charges passed on to the pay channel broadcasters;*
> *(ii) Sale of hardware including Integrated Receiver Decoder required for connectivity at the consumer premise;*
> *(iii) Service/Entertainment tax actually paid to the Central/State Government, if gross revenue had included them."*

Later on, on the petitions filed by Sun Direct TV Private Limited and Bharti Telemedia Limited being Petition Nos. 92/2009 and 93/2009 respectively before TDSAT challenging the levy of the License Fee on the basis of Gross Revenue, the same were allowed by the Hon'ble TDSAT vide its Judgment dated 28.05.2010, wherein Hon'ble TDSAT reiterated that certain deductions have to be made from Gross Revenue for the purposes of calculation of License Fee for the DTH operators. These deductions included subscription fee payable to broadcasters, commission paid to the dealers and distributors, payments received on behalf of third party,

installation charges passed to the other parties and taxes paid to the Government. These facts should also be taken into consideration by TRAI.

In this regard, it is also important to note that the broadcasters are licensed by the Ministry of Information and Broadcasting under the uplinking and downlinking guidelines upon payment of license fee and as such, the logic of pass through items should also be applied for DTH also, as in the case of telecom. The recommendations made till date in respect of license fee payable by DTH operators did not consider this aspect and we would request TRAI to make necessary changes in the said recommendation and also apprise the Ministry of Information and Broadcasting as the Ministry is in the process of finalising the terms and conditions for renewal of DTH license.

Similarly, the Entry Fee of Rs. 10 Crore is levied on HITS and DTH operators while leaving the DAS operators. Further while there is no Entry Fee for uplinking license, the same for downlinking license is only Rs. 2 lakhs per annum. Clearly therefore there is a huge heterogeneity in the industry and the needs to be sorted out so as to ensure that any particular stakeholder is not unilaterally prejudiced.

DISCRIMINATION BETWEEN SUBSCRIBERS OF DIFFERENT PLATFORMS

The subscribers of the DTH platform, like subscriber of any other platform receive the same registered and permitted channels. The intent and purpose of the activity of broadcaster and that of the DTH operator and any other Distribution Platform Operator is same, i.e, making the same channel available for public viewing. The DTH operator as well as any other DPO merely provides connectivity between content broadcaster and the consumer. However, the Authority has not prescribed any condition of service for the platforms like IPTV and OTT which is clear case of discrimination resulting in non-level playing field. Thus the discrimination is hostile and arbitrary. With the advent of Digitisation, it is imperative that a non-discriminatory regime for the subscribers is put in place.

OTT PLATFORM: A DEVICE TO CIRCUMVENT THE EXISTING REGULATORY FRAMEWORK

The Broadcaster, who have obtained the permissions to uplink / downlink channels from the Ministry of Information and Broadcasting, have started using the internet platform to make their content / channel available. Furthermore, the broadcasters are themselves distributing the same content to the users. Accordingly, the Broadcaster is operating as “Broadcaster” as well as “distributor of televisions channels” on the internet platform.

In this regards, the following points are important to note:

- In terms of the extant TRAI Regulations, a Broadcaster means any person including an individual, group of persons, public or body corporate, firm or any organization or body who/which is providing broadcasting service and includes his/her authorized distribution agencies.

- Further, the Broadcasting services means the dissemination of any form of communication like signs, signals, writing, pictures, images and sounds of all kinds by transmission of electromagnetic waves through space or through cables intended to be received by the general public either directly or indirectly and all its grammatical variations and cognate expressions shall be construed accordingly.

- A bare perusal of the above two definitions clearly provide that the dissemination of the Television channel content even through internet will amount to broadcasting service and the person broadcasting the same would be broadcaster.

Further, it is also important to note that the content being provided by the broadcasters are free of cost with an intention to create a captive subscriber base and create a monopolistic situation. Because of 'free of cost' provision of the content by the broadcasters through OTT services, other distributor of TV Channels are heavily prejudiced. This method of streaming of content by the broadcasters directly to the customers, bypassing all the intermediaries would ultimately have the effect of potentially threating the existence of the other distribution platforms. With the launch of 4G services this trend is more alarming. Such provision of content completely at no cost would only induce the subscribers to shift their operators for the purpose of channel viewing.

Impacts of the provision of TV Channels / contents by the Broadcaster

- Since the Broadcaster are providing the channels / content directly to the consumers, that too without any charge, this would create a monopolistic situation where the Broadcaster, being the distributor also would also control the end mile solution.

- The TRAI Regulations clearly prohibit any distributors of TV channels or a broadcaster to enter into any exclusive contract. In the present case, on the internet platform, since the broadcaster is also a distributor of TV channel, the arrangement is clearly exclusive in nature. The reasons for prohibiting exclusivity

under TRAI Regulations was to ensure an orderly and equal growth of all distribution platform.

- Furthermore, the instant situation, where the broadcaster is also a distributor of TV channels, is also in breach of the cross holding restrictions notified by the government which clearly prescribes cross holding restriction between broadcasters and distributors. In the absence of similar prescription for internet based provision of channels, the broadcasters are breaching the cross holding restriction while providing the channels directly to the subscriber.

In this regard, we would also like to state that the primary objective for establishment of the TRAI was to protect the interest of the service providers and consumers and to promote and ensure the orderly growth of the telecom sector which includes the DTH sector. This objective is enshrined in the preamble of the TRAI Act, and the same is mentioned as under:

"To provide for the establishment of (Telecom Regulatory Authority India and the Telecom Disputes Settlement and Appellate Tribunal to regulate the telecommunication services, adjudicate disputes, dispose of appeals and to protect the interest of service providers and consumers of the telecom sector, to promote and ensure orderly growth of the telecom sector) and for matters connected therewith or incidental thereto."

With the enormous increase in the users availing the channels through internet, it is imperative that the TRAI steps in right now to notify certain regulation to cease the advent of monopolistic activities. As clarified in the opening paragraphs, there should not be any difference in any two modes of channels distribution considering the wide amplitude of the definition of 'telegraph' in the Indian Telegraph Act, 1885 and 'telecommunication service' in the TRAI Act, 1997. While some may deny that the OTT business may not be in the domain of the Ministry of Information and Broadcasting, however considering the above definition, such an argument would fall flat. We therefore expect that the TRAI would notify necessary regulations to ensure the orderly growth of the industry and also to provide a level playing field to the distributor of TV channels.

It is submitted that under the proposed tariff framework, if a channel is declared as a Pay channel by the Broadcaster, then the said channel should neither be allowed to be made available on any other distribution platform at a cost lower than the published price nor should the subscribers of the distribution platform should be able to receive the same free of cost. The regulation may provide for partial exemption of news channels.

AMENDMENT IN THE SPORTS BROADCAST SIGNALS (MANDATORY SHARING WITH PRASAR BHARTI) ACT, 2007

Lastly we wish to highlight the issue regarding mandatory sharing of sports broadcasting signals with Prasar Bharti. Though the said issue has been decided by the Hon'ble Supreme Court, however we strongly believe that said outcome of such a noble enactment was neither intended nor envisaged. With all due respect to the Apex Court of the country, we would like to state that the intention behind any enactment cannot be better understood than the preamble of the same and the preamble of 'The Sports Broadcasting Signals (Mandatory Sharing with Prasar Bharti) Act, 2007 states as under:

> *"An Act to provide access to the largest number of listeners and viewers, on a free to air basis, of sporting events of national importance through mandatory sharing of sports broadcasting signals with Prasar Bharati and for matters connected therewith or incidental thereto."*

The above very clearly establishes that the intention of the lawmakers was never to limit the applicability of the Act only on the retransmission of the same through the terrestrial and Direct-to-Home network of Prasar Bharti. This can be evident from the 'Statement of Objects and Reasons' attached along with the bill introduced in the Parliament and the statement made by the then Hon'ble Minister of I&B Late Shri Priyaranjan Dasmunsi who sought to provide widest possible access to sporting events through the Act. However, the said intention could not properly be reflected in section 3 of the Act which resulted into a long chain of litigation initiated by BCCI and some broadcasters and ultimately limiting the scope of the said Act only onto terrestrial and Direct-to-Home network of Prasar Bharti. It is thus requested that the Government should make adequate amendment in the Act to as to widen/extend the applicability of the Act as envisaged originally.