



PRODUCERS
GUILD
OF INDIA

December 20, 2021

**To
Mr. Anil Kumar Bharadwaj,
Advisor (B&CS),
Telecom Regulatory Authority of India**

Dear Sir,

This is with reference to the Consultation Paper on "Market Structure/Competition in cable TV services" published by the Telecom Regulatory Authority of India on October 25, 2021.

We, the Producers Guild of India, are the association of the pre-eminent producers of film, television and digital content in India. A list of our current members is attached for your reference.

We would like to make some limited observations/comments on the Consultation Paper from the perspective of copyright owners/content creators.

As under:

1. The Right and the ability to exploit content is not limited by the medium and the person having copyright over content (through ownership or rights under license) cannot be restricted from making it available on any platform, subject to the same being covered under the terms of the contract entered into by the copyright owners and licensee.
2. Putting fetters (as suggested in some comments) on the ability to make content created/licensed by any broadcaster, available on OTT platform(s) would be against the letter and spirit of freedom and speech and expression guaranteed under Article 19(1)(a) of the constitution which safeguards the ability to make widest possible dissemination of content (being an important facet of speech and expression). Importantly, it would also be incongruous with the Copyright Act, 1957 which envisages copyright as a bundle of rights and recognizes content as a work protected thereunder.
3. Accordingly, the ability to exploit content across different mediums is in-built in copyright and alleging competition issues principally/primarily at the back of the copyright owner making its content available on different mediums is not in consonance with the established legal principles which hold the field in the subject matter.

We request you to kindly consider our feedback and be mindful of the interests of copyright owners/producers while deliberating on the issues covered by the Consultation Paper.

Yours sincerely,

Nitin Tej Ahuja
CEO, Producers Guild of India
www.producersguildindia.com



MEMBERS LIST	
Sr. No.	Banner Name
1	A.G. Vision LLP
2	Aamir Khan Productions Pvt. Ltd.
3	ABP Creation Pvt. Ltd.
4	Abundantia Entertainment Pvt. Ltd.
5	Ad-Labs Films Ltd.
6	Alliance Media & Entertainment Pvt. Ltd.
7	Amazon Seller Services Private Limited [Amazon Prime Video]
8	Anand Pandit Motion Pictures (Division of AKP Holding Pvt. Ltd.)
9	Anil Kapoor Films Co. Pvt. Ltd.
10	Applause Entertainment Pvt. Ltd.
11	Applause Productions - A Unit of Applause Entertainment Pvt Ltd
12	Aradhana Films
13	Ashutosh Gowariker Productions Pvt. Ltd.
14	B R Studios LLP
15-17	B. R. Films / B. R. Films Pvt. Ltd. / B. R. TV
18	B4U Broadband (India) Pvt. Ltd.
19	Balaji Telefilms Ltd. / Balaji Motion Pictures Ltd.
20	Bandra West Pictures Pvt. Ltd.
21	Benchmark Pictures
22	Bhansali Productions Pvt. Ltd.
23	Block Buster Movie Entertainers
24	BSK Network and Entertainment Pvt. Ltd.
25	Cinestaan Film Company Pvt. Ltd.
26	Clean Slate Filmz Pvt. Ltd.
27	Coconut Motion Pictures
28	Creative Eye Ltd.
29	D M Movies Pvt. Ltd.
30	Dashmi Studioz LLP
31	Dharma Productions Pvt. Ltd.
32	Dharmatic Entertainment Pvt. Ltd.
33	Dilraju Productions LLP
34	Director's Kut Production
35	Eagle Films Pvt. Ltd
36	Emkay Films Pvt. Ltd
37	Emmay Entertainment & Motion Pictures LLP
38	Eros International Media Ltd.
39	Essel Vision Productions Limited (Zee Studios)
40	Excel Entertainment Pvt. Ltd.
41	Filmkraft Productions (India) Pvt. Ltd.
42	Filmunit
43	Filmyug Pvt. Ltd.



44	First Light Productions
45	Fox Star Studios (A Division of Star India Pvt. Ltd.)
46	Goel Cine Corporation
47	Guilty By Media Association LLP
48	Himalaya Films
49	Hungama Digital Media Entertainment Pvt. Ltd.
50	Indus Stories LLP
51	Inspired Entertainment Pvt. Ltd.
52	Intercut Entertainment Pvt. Ltd.
53	IVY Entertainment Pvt. Ltd.,
54	J A Entertainment Pvt. Ltd.
55	Junglee Pictures Limited
56	K A Productions LLP
57	Karma Media and Entertainment LLP
58	Kairos Kontent Studios Pvt. Ltd.
59	Kino Works LLP
60	Kross Pictures India Pvt. Ltd.
61	Loneranger Productions Pvt. Ltd.
62	Luv Films LLP
63	Lyca Productions Private Limited
64	Maddock Films Pvt. Ltd.
65	Manzar Studios Pvt Ltd
66	Maruti International
67	Masen Production Pvt. Ltd.
68	Mehboob Productions Private Ltd.
69	Motion Picture Distributors Association India Pvt. Ltd.
70	Mukta Arts Limited
71	Mutant Films Pvt. Ltd.
72	Nadiadwala Grandson Entertainment Pvt. Ltd.
73	Nasir Husain Films Pvt. Ltd.
74	National Film Development Corp. Ltd
75-77	Navketan (1978) / Navketan Films / Navketan International Films
78	Neela Telefilms Pvt. Ltd.
79	Netflix Entertainment Services India LLP
80	Offside Entertainment LLP
81	Optimystix Entertainment India Pvt. Ltd.
82	Phantom Films Pvt. Ltd.
83	Prakash Mehra Pictures P. Ltd.
84	Pramod Films
85	Prasad Productions Pvt. Ltd.
86	Pritish Nandy Communications Ltd.
87	PVR Pictures Ltd.
88	Qissago Telefilms LLP
89	Quasar Films Pvt. Ltd.
90-91	R. K. Films & Studios / R. K. Films & Studios Pvt. Ltd.



92	R. S. Entertainment Pvt. Ltd.
93	Rainshine Entertainment Pvt. Ltd.,
94	Rajshri Pictures Pvt. Ltd.
95	Red Chillies Entertainments Pvt. Ltd.
96	Rakeysh Omprakash Mehra Pictures Private Limited (ROMP)
97	Reliance Entertainment - Division of Reliance Big Entertainment Pvt. Ltd.
98	Reliance Industries Ltd.
99	Retrophiles Pvt. Ltd.
100	RH Films LLP
101	Rising Sun Films Pvt. Ltd.
102	Rose Audio Visuals Pvt. Ltd.
103	Roy Kapur Productions Pvt. Ltd.
104	Rupam Pictures Pvt. Ltd.
105	Sagar Entertainment Ltd.
106	Salman Khan Ventures Pvt. Ltd.
107	Saregama India Limited
108	Select Media Holdings LLP
109	Shankar Movies
110	Shemaroo Entertainment Ltd.
111	Shiamak Davar Institute for Performing Arts Pvt. Ltd.
112	Shyam Benegal Sahyadri Films
113	Siddhant Cinevision Pvt. Ltd.
114	Sikhya Entertainment Pvt. Ltd.
115	Sippy Films Pvt. Ltd.
116	Soham Rockstar Entertainment
117	SOL Production Pvt. Ltd.
118	Sony Pictures Networks India Private Limited
119	Sony Pictures Films India Private Limited
120	Sphereorigins Multivision Pvt. Ltd.
121	Star India Pvt. Ltd.,
122	Subodh Mukerji Productions
123	Super Cassettes Industries Pvt. Ltd.
124	Swastik Productions Pvt. Ltd.
125	Tiger Baby Digital LLP
126	Tilak Movies Pvt. Ltd.
127	Tips Industries Ltd.
128	Trimurti Films Pvt. Ltd.
129	Tusshar Entertainment House
130	Udbhav Dreamzone Pvt. Ltd.
131	UFO Moviez India Limited
132	Ultra Media & Entertainment Pvt. Ltd.
133	Unilazer Ventures Pvt. Ltd.
134	V R Pictures
135	V Shantaram Productions Pvt. Ltd.
136	Vaibhav Vijay Anand Pictures



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137	Vertex Motion Pictures Pvt. Ltd.
138	Viacom 18 Motion Pictures/ Viacom 18 Media Pvt. Ltd.
139	Vinod Chopra Productions
140	Vishal Bhardwaj Pictures Pvt. Ltd.
141-142	Vishesh Entertainment Pvt. Ltd. / Vishesh Films Pvt. Ltd.
143	Vishesh Music Pvt. Ltd.
144	Vistaar Entertainment Ventures Pvt. Ltd.
145	Warner Bros. Pictures (India) Pvt. Ltd.
146	Windows
147	Wiz Films Pvt. Ltd.
148	Yash Raj Films Pvt. Ltd.