



Sri Sai Media Pvt. Ltd.

To

Advisor (B&CS)
Telecom Regulatory Authority of India (TRAI)
Mahanagar Doorsanchar Bhawan
Jawaharlal Nehru Marg
New Delhi-110002

Subject: EASE OF DOING BUSINESS

Dear Sir,

This is in regards to consultation paper issued by TRAI on ease of doing business. Please find attached our comments for your kind consideration in the recommendations.

Regards

19/01/2022

Shambhu Singh
Editor-in-Chief/COO
M/s. Sri Sai Media Pvt. Ltd. (SWADESH NEWS)
E: shambhuguddu@gmail.com
Mobile: 9915815260





Sri Sai Media Pvt. Ltd.

EASE OF DOING BUSINESS



PERMISSION FOR UPLINKING & DOWNLINKING OF TV CHANNELS / TELEPORTS:-

1. There should be no requirement of examination of net worth certificate and balance sheet from empanelled CA as net-worth certificate and balance sheet are issued and signed by practising CA.
2. Whenever company is applying for permission to uplink TV channels on satellite which is already co-ordinated then there should not be fresh requirement of satellite clearance from DOS, ISRO. MIB may send the application to DOS, ISRO for information/records only and if in case DOS, ISRO has any objection, they may intimate MIB about their objections. Ideally DOS, ISRO should share list of coordinated satellite with MIB so that MIB can check the list and process accordingly.
3. There is a time lag of almost 30 days from the date of issuance of LOI and date of issue of grant of permission. The moment MIB receives clearance from MHA, Applicant Company should be asked to furnish permission fee and performance Bank guarantee.
4. The window to operationalise should be increased from 1 year to at least 2 years subject to validity of PBG and payment of permission fee.
5. To avoid any kind of interference and conflict of business interest with other services like DTH players, uplinking of TV channels should only be allowed in C-band and in case uplinking is taking place in any other band the signals should be encrypted.

CHANGE OF LOGO / MODE OF TRANSMISSION / SATELLITE/ TELEPORT:-

Change of logo / mode of transmission / satellite for an already permitted channels should be mere a 15 days prior intimation and there should not be any requirement of additional permission.

CHANGE OF NAME BY PERMITTED CHANNEL:-

Change of name by an existing operational channel should be mere intimation only subject to below:-

1. Applicant Company has a valid trade mark related documents and has a legally established link.
2. There is no change in shareholding pattern and directorship of company from last intimated SHP and directorship. Company will continue to provide undertaking as required in the current regime.

19/01/2022

Regd. off. : Near Shan Hotel, Dalhousie Road, Pathankot-145001 Punjab. Ph. 0186 - 2222272-82

H.O. : 54, Industrial Area, Phase 2, Panchkula - 134113 Haryana. Ph. 0172-2592777

www.swadeshnews.com , www.satyaswadesh.com



Sri Sai Media Pvt. Ltd. ADDITION OF NEW DIRECTOR ON BOARD:-



Appointment of directors should be mere intimation in accordance with company law. If in case MIB receives adverse comment then company may be asked to take necessary action accordingly.

An individual who is already security cleared and serving on board of a company permitted to operate TV channels / teleport should be allowed to be appointed on board of another broadcasting entity. This should be mere intimation.

TRANSFER OF TV CHANNEL PERMISSIONS:-

1. Transfer of TV channel permission from company A to company B should be allowed through mere intimation if company B is already security cleared for operating in same category of TV channels/ services. This is should be mere subject to submission of undertaking that company B full fills all the criterion required for adding channels from company A. The transfers/ mergers should be in-line with company's law.

For example, a news / non-news channels operated by company A should be allowed to be transferred to company B if company is already operating news channels and full fills net worth requirement from addition of channel.

PERMISSIONS GRANTED BY WPC

Satellite - Broadcast Network - TELEPORT /DSNG:

Equipment's operating under a particular WPC license operates on fix sets of technical parameters which is directly related to bandwidth allocated on a particular satellite. Operator cannot deviate from these fix parameters unless and until there is a consent sought from satellite operator.

Since all these parameters are fixed and cannot be changed by mere own wish, WPC should take declaration of information and basis declaration automatically license number should be generated from portal after cross verification

In current setup, WPC follow below steps for grant of license:-

STEP 1:- Issuance of LOI - Basis grant of permission from MIB and frequency approval from NOCC, WPC grants LOI/Decision letter

STEP 2:- After LOI is issued then broadcaster needs to approach various department of WPC for below permissions:-

a) SACFA Clearance: - this generally takes 2-3 months. SACFA clearance is not required for DSNG operations

b) Import License: this takes an average of 1 month.





Sri Sai Media Pvt. Ltd.



After grant of above permissions, operator needs to approach NOCC for MPVT to check if all the equipment's are working as per the submitted technical parameter.

STEP 3:- Once MPVT is cleared than again operator needs to approach WPC wing for issuance of operating license.

Satellite – Broadcast Network – Temporary permission to use DSNG:

Temporary permission to use DSNG should be mere intimation as these are permissions which are given to DSNG operators who are already having a valid license to use a satellite bandwidth which is different from the permitted one.

Satellite TV channel endorsement / De-endorsement:-

TV channels are endorsed / De-endorsed on already permitted bandwidth and there is a fixed mathematical calculation whether channel will be able to get endorsed or not. Teleport operator themselves knows that whether they will be able to uplink a new TV channel or not basis their existing capacity.

Endorsement and De-endorsement should be mere intimation only. Change of Name/Mode of satellite TV channel should also be intimation only.

Non-Dealer Possession License (NDPL):-

Operators should be allowed to keep their un-used equipment under NDPL without any cap on time limit as RF equipment's are very costly equipment and can be used even after span of time.

Dealer Possession License (DPL):-

Since RF equipment's are costly equipment's and if they are not used by captive user than the user may be allowed to give its equipment to a DPL license holder company.

Network Operations Control Centre ("NOCC")

Final uplinking permission:-

Post grant of frequency approval and issuance of operating license from WPC, operators are required to take final uplinking permission from NOCC.

Since required permissions for uplinking has already being granted by NOCC and WPC, we request this should be only an intimation.

Endorsement / De-endorsement / Change of name / change of mode should be an intimation only.

SRI SAI MEDIA (P) LTD.
19/01/2022

Regd. off. : Near Shan Hotel, Dalhousie Road, Pathankot-145001 Punjab. Ph. 0186 - 2222272-82

H.O. : 54, Industrial Area, Phase 2, Panchkula - 134113 Haryana. Ph. 0172-2592777

www.swadeshnews.com , www.satyaswadesh.com



SINCE : 1996

Sri Sai Media Pvt. Ltd.

Department of Space, ISRO (DOS)



दैनिक हिन्दी समाचार पत्र

सत्य स्वदेश
सफर सच का

Broadcasters / teleport / DSNG operators if required can lease bandwidth on Indian satellite through DOS by submitting a capacity request from along with security deposit. DOS should display on its website about the availability of bandwidth capacity which is available with them so that process is transparent and clear.

DOS should also place on their website about the future roadmaps with regards to satellite launch and use so that users can plan accordingly. The customer support service of DOS should be more robust and turnaround time should be minimal.

Broadcasters / teleport / DSNG operators are required to apply in MIB for various permissions. MIB then forward the proposal to seek satellite clearance from DOS and post grant of clearance from DOS, MIB further process application.

Below should be considered keeping in view of EOBD:-

1. DOS should provide a list of coordinated satellite to MIB and then basis this list MIB should grant clearance. MIB should intimation to DOS about the companies to whom it is granting clearances so that DOS also has the record of permission granted by MIB.
2. In case where broadcaster / operator has hired bandwidth from DOS and has some dues which are payable to DOS. DOS should immediately informed MIB / concern department and clearance granted should be withdrawn or operator should be asked to clear the due immediately.
3. In order to avoid any conflict of business interest and interference two separate operations should not be allowed on a particular satellite. For example if an operator A is operating DTH on satellite B, then satellite B should be specifically used for DTH services / distribution services only.

SRI SAI MEDIA (P) LTD.
19/01/2022