

TATA SKY'S RESPONSE TO THE TRAI'S PRE-CONSULTATION PAPER ON INFRASTRUCTURE SHARING IN BROADCASTING TV DISTRIBUTION SECTOR, DATED 23RD MAY, 2016

ISSUES FOR CONSULTATION:

- 4.1 *In addition to infrastructure sharing possibilities discussed in pre-consultation paper what more can be shared by the DPOs (MSOs, HITS, DTH) for better utilization of infrastructure?*
- 4.2 *What could be the operational, commercial, technical and regulatory issues which require to be addressed at the time of developing policy and regulatory framework for enabling infrastructure sharing in the broadcasting TV distribution space?*
- 4.3 *Do you envisage any requirement for change in the existing licensing / registration framework laid for DTH, DAS and HITS broadcasting services? If yes, please specify those changes clearly for each platform?*
- 4.4 *What could be the implications of allowing separation of network and service provider functions at distribution level? How the responsibilities can be divided between the network and service providers?*
- 4.5 *Any other issue which you feel will be relevant for enabling the infrastructures sharing and separation of network and service provider functions in TV distribution sector?*

TATA SKY RESPONSE:

- We thank the TRAI for having come out with a detailed Pre Consultation Paper on the issue of satellite capacity being provided to the DTH industry, and also the optimum use of available capacity.
- We also thank the TRAI for efforts made by it in the past on the issues of satellite capacity and working with the industry on it.
- As noted in the CP, the practical difficulties with infrastructure sharing are at an operational and commercial level.
- Furthermore, the primary issue is provision of suitable infrastructure and not sharing of infrastructure among the service providers.

The Department of Space (the "DoS")'s Role

- The DoS already looks into technical capacity required by each player in the industry and its views should be elicited in this matter.
- We have read press reports suggesting a different position by them in the respect, therefore would require that the government and regulator agree on the strategy prior to this process.
- Further, less than 2 months back, all DTH operators have already provided the DoS with their estimated requirements, post such response being requested by the DoS. In fact DTH operators have also paid a deposit for such capacity.
- In terms of the suggestion to decouple the "network" and "services", we do acknowledge that if the DoS itself devises a mechanism whereby it acts as an infrastructure or "network service" provider to various distributors and ensures efficient operations and maintenance of networks to ensure optimal utilization, this may be useful as it reduces the burden on service providers to obtain numerous regulatory approvals, and enables them to concentrate on the quality of service (other than those related to network quality).
- This will also negate any need for either the entire industry to work together, or groups within the industry work together enable this to happen.