



# Ushodaya Enterprises Private Limited

CIN No.U40102TG1973PTC001763 – Website: [www.eenadu.net](http://www.eenadu.net)

Registered Office: 3rd Floor, Corporate Building, Ramoji Film City, Anajpur Village,  
Ranga Reddy District, Telangana State – 501 512, India. Phone: 040-22232223, Fax: 040-22232225.

Shri Anil Kumar Bhardwaj,  
Advisor (B&CS),  
Telecom Regulatory Authority of India,  
email: [advbcs-2@traigov.in](mailto:advbcs-2@traigov.in)  
[jtadvbcs-2@traigov.in](mailto:jtadvbcs-2@traigov.in).

Respected sir,

## WRITTEN COMMENTS OF USHODAYA ENTERPRISES PRIVATE LIMITED ON THE ISSUES RAISED IN THE CONSULTATION PAPER RELATING TO MEDIA OWNERSHIP

On behalf of Ushodaya Enterprises Private Limited, the owners and publishers of Eenadu Telugu daily newspaper and ETV Bharat digital news portal, we state as under:

1. The very concept of restricting cross media ownership erroneously presupposes that a consumer reads the same news from three different platforms owned and operated by the same entity, and accepts such news as unequivocal opinion of the media in India.
2. TRAI having received references from MIB had given its recommendations 13 years ago and the media has seen a digital revolution in last couple of years.
3. Some of the misconceptions in the consultation paper are
  - i. concentration of media ownership leads to reduction in number of sources of news and information
  - ii. cross media ownership curbs diverse opinions from being expressed
  - iii. Because of its market dominance a media house having cross media will have an adverse impact on dissemination of diverse opinion.
  - iv. Cross media ownership prevents plurality of news and by imposing fetters on media houses from entering into cross media ownership plurality of news can be achieved
4. The consultation paper is based on the above premise.
5. Some of the following facts stated in the consultation paper are significant in determining the present issue:
  - i. print media saw dwindling revenues in the year 2019- 2020 while at the same time, 1498 new publications have been launched, which shows that



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there is competition in print media and that new entities are willing to foray into the media, fostering diverse opinions from these new entities.

- ii. The trend of M& E sector is that print media readership and television viewing is declining; and that audiences are moving towards digital media instead of going to news channels offered by news media, resulting in “distributed discovery”. This trend negates the theory that cross media will have adverse effect on public getting diverse opinions.
6. There is an observation in the consultancy paper that digital media landscape is marked by the dominance of limited number of very large players, resulting in reduction of media pluralism. This observation is far from the ground reality. Media houses venture into other segments like TV or digital, more from the point of synergies, economic feasibility, more efficient use of resources etc rather than to influence public opinion. Today we can see innumerable number of news portals providing local news, each portal giving its own views and opinions. The public has a huge choice of media vehicles in the present eco system, and there is no possibility of Cross Media ownership, influencing public opinion.
7. The consultation paper rightly observed that there are no enforcement tools/powers available to the regulators to ensure corrective mechanism. Therefore while certain media houses abide by law and voluntarily enforce The orders of the regulators there are others who simply ignore such orders with impunity. So, there is no level playing field.
8. The consultation paper highlighted the latest trends in the International scenario of removing restrictions on cross media ownership. In any event the media landscape in India cannot be compared with any developed country in the world, owing to many regions with diverse languages, culture, traditions, practices.
9. One cannot lose sight of the fact that both National and vernacular media is highly fragmented with a plethora of newspapers and TV channels in every State, not to mention the ever increasing number of Websites / social media channels.
10. We state that there is no need for any new regulator for cross media control separately and regulators like CCI and SEBI are sufficient to monitor / control any monopoly or restrictive trade practices.



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11. The Current Media scenario in India with multiple players in each segment, does not call for or justify any steps for Cross Media control, as plurality and diversity of views from the existing fragmented media, gives no scope for any potential impact on democratic processes or influencing public opinion. It is a myth that concentration of Media ownership in different verticals, is harmful to the society. What is sought to be achieved by a control mechanism is impractical and unrealistic. It will only try to impose fetters on media houses and gives a handle to Government agencies, resulting in arbitrariness.
12. In this background, our views are that:
  - i. There is no need for monitoring of cross media ownership and control
  - ii. There cannot be a common mechanism for print, electronic and digital media as the mode of generation of news is different and each of the media have their own unique systems of generation and dissemination of news. the regulatory setup that we currently have in the form of in the form of PCI for print NBDA and BCCC for electronic media and new self regulatory authorities formed under IT Rules 2021 are sufficient since there is by default, the court of law which adjudicates disputes between media and consumers
  - iii. Mergers and acquisitions are business related which will not have any bearing on generation and dissemination of news. therefore there is no need to monitor takeovers and acquisitions of media companies.
  - iv. There is no straitjacket formula for defining and measuring ownership control. There cannot be any fetters imposed on a business entity based on the notion that such control impedes plurality of news.
  - v. No
  - vi. No Comment
  - vii. There can't be any discrimination by way of selectively overseeing certain genre of media ownership.
  - viii. One media segment cannot be arbitrarily decided as being relevant for encouraging rural viewpoints.
  - ix. Media is defined as an entity which generates news, views and opinions on matters of public importance. This definition cannot



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and should not be confused with channels of distribution. If MSO and LSO were to be included in the definition of media, then even a Hawker who sells newspapers should be included in the definition of media.

- x. Several factors contribute to the growth of media in a particular territory. We opine that there is no need to evaluate anything like media concentration.
  - xi. No Comment
  - xii. No Comment
  - xiii. No Comment
  - xiv. No Comment
  - xv. No Comment
  - xvi. It would not be appropriate to put any restrictions on cross media ownership in any manner whatsoever.
  - xvii. not applicable
  - xviii. There cannot be any restriction on any entity from acquiring or retaining ownership control in any media segment
  - xix. no cross media ownership restriction can be imposed
  - xx. not applicable
  - xxi. not applicable
  - xxii. not applicable
  - xxiii. merger and acquisition in media sector cannot be subjected to any regulations
  - xxiv. An entity having interest in both broadcasting and distribution is likely to jeopardise the interests of other broadcasters by imposing fetters on the distribution of other broadcasters. A ceiling of 20% should be an adequate measure to determine control of an entity.
  - xxv. not applicable
  - xxvi. Disclosures and compliance reports for different types of licenses would be sufficient to accept in media ownership of control.
  - xxvii. not applicable
13. We state that there is no need for any additional levels of safeguards with respect to issues relating to media ownership, particularly cross-media ownership and vertical integration in the broadcasting sector.



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14. We request the Telecom Regulatory Authority of India, to consider our comments favourably.

Thanking you  
Yours faithfully

For Ushodaya Enterprises Private Limited

K. Bapineedu Choudary  
Executive Director