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10<sup>th</sup> April 2026

To,

**Dr. Deepali Sharma,**

Advisor (B&CS),  
Telecom Regulatory Authority of India

Madam,

**Subject:- Consultation Paper on Formulation of a Regulatory Framework for  
Application-based Linear Television Distribution (ALTD) Services (Including Free  
Ad-Supported Streaming Television (FAST) Services)**

We are TRAI authorised CAG for Karnataka State.

We have attached our comments on the above consultation paper on selected questions for your consideration.

Thanking you,

Yours sincerely

Gopal Ratnam V  
Secretary

**Comments on**  
**Consultation Paper on Formulation of a Regulatory Framework for**  
**Application-based Linear Television Distribution (ALTD) Services**  
**(Including Free Ad-Supported Streaming Television (FAST) Services)**

Q1. What should be the appropriate definition and scope of Application-based Linear Television Distribution Services, i.e., 'ALTD Services' in the Indian broadcasting context, taking into account terminologies available internationally? Stakeholders are requested to provide their comments with detailed justification.

**"ALTD Services are internet-based platforms that provide linear television-like channels (scheduled content streams) to users, typically free or bundled, supported by advertising, and accessible across connected devices."**

**The rationale for this definition is that consumers do not distinguish between the various channels that delivers television like DTH, Cable TV or FAST channels. The focus should be on viewer experience and not on the technology. Further Consumers seek the same level of protection across the various services.**

Q2. The 'ALTD Services' ecosystem involves multiple entities, including application providers, television equipment manufacturers, operating system providers, broadcasters, content providers, content aggregators and other technology or solution providers. However, the application provider appears to play a central role in the distribution of linear television channels across various business models. In this context, should the Application Provider be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of 'ALTD Services'?

a. If yes, please provide detailed justification and supporting reasons.

b. If not, please identify the appropriate stakeholder(s) who should be responsible for obtaining such authorisation, along with rationale.

**Yes. The Application Provider should be designated as the Primary Stakeholder.**

**The Application Provider controls many components of the Service like Content Aggregation, User Interface and Advertisement Insertion. Further, Consumers have direct relationship with the Application Provider when downloading the App. The consumers use the interface designed by the Application Provider and also watch the content including advertisements which is curated by them**

**In the event of any issue the consumers faces like Content Complaints, Advertisement Complaints, Service Quality, Payment Issues or Data Privacy, a single point of accountability would be the most practical and effective for consumers. Otherwise in such multi-entity service chains like FAST services there would fragmentation of responsibilities and conflicts between entities resulting in bad consumer experience.**

Q3. What should be the terms and conditions including fees or charges for the grant of service authorisation to the application providers provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Annexure-II of 'Authorisation Recommendations dated 21st February 2025'?

Stakeholders are requested to provide their detailed comments including but not limited to the following conditions:

- a. Service Area
- b. Validity Period
- c. Eligibility Conditions
- d. Minimum Net worth
- e. Processing Fee
- f. Entry Fee
- g. Bank Guarantee
- h. Authorisation Fee
- i. Security Deposit
- j. Roll Out Obligations
- k. Any other terms and conditions

Further, what terms and conditions/obligations should be put in place for foreign entities providing 'ALTD Services' in India?

#### **A to J**

**No Specific comments at this stage. However, the authorisation should prioritize consumer protection rather than revenue extraction. Also, the authorisation should be light-touch without being too heavy or totally absent. The rationale for this comment is given below.**

#### **K. Any other terms and conditions.**

**The Platforms should be registered in India and certain conditions be made mandatory**

- 1. Grievance Officer should be based in India**
- 2. There should be a high degree of disclosures (high transparency)**
- 3. Minimum Service Standards should be stipulated along with penalties both monetary and non-monetary for non-compliance.**

Q4. What should be the common terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part-I of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:

- a. Renewal of Authorisation
- b. Renewal Fee
- c. Equity Holding and Management Control
- d. Restriction on cross-holding of equity shares/capital contribution between
  - i. TV broadcasters and application providers provisioning ALTD services
  - ii. Application Providers provisioning ALTD services and other DSPs
- e. Transfer/Surrender of Service Authorisation
- f. Sharing of Infrastructure
- g. Any other terms and conditions

#### **A to F**

**No Specific comment at present.**

#### **G. Any other terms and Conditions**

**Consumers need clarity and trust in the Service. Hence there should be clauses in the terms and conditions that ensure clarity and creates trust in the Service.**

- 1. Channel must display their origin (India/Foreign) and regulatory status (licensed/Unlicensed)**
- 2. Platforms must ensure that there is no harmful content especially for children.**

Q5. What should be the specific terms and conditions for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part II of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:

- a. Reservation of operational channel capacity by Vertically Integrated Entity
- b. Platform Services (PS) offered by application providers provisioning ALTD services
- c. Monitoring and Inspection of facilities
- d. Supply of Information to Central Government/TRAI
- e. Contravention of terms and conditions of authorisation

f. Any other terms and conditions

Further, whether the mandatory sharing of Sports Broadcasting Signals with Prasar Bharati and the compulsory transmission of certain channels as mandated for DTH, HITS and IPTV services should be applied to the application providers provisioning 'ALTD Services'. Stakeholders are requested to provide their comments with detailed justification on all such obligations that should be made applicable on such entities.

**The same conditions that apply to DTH, HITS and IPTV services should apply to the ALTD Services too. With the playing field level for all these services as far the mandatory sharing of Sports Broadcasting Signals with Prasar Bharati and the compulsory transmission of certain channels is mandated to be offered, the consumer would be positioned to make her choice easily based on the suitability of services without having to factor these common factors.**

Q11. What obligations are required to be specified for the authorised entities provisioning ALTD services, with respect to consumer protection and grievance redressal mechanism, considering the different modes of service access such as smart televisions, websites, mobile applications etc.? Please provide your comments with detailed justification.

While we have indicated the obligations that the authorised entities provisioning ALTD services should be required to undertake in answers to the earlier questions, here a comprehensive framework for consumer protection.

**There is a need for a strong regulation in the area of consumer protection.**

### **1. Clear Liability**

**The Application Provider is the primary accountable entity and solely responsible for the deficiencies of the services. The onus cannot be shifted to other entities in the Services Chain.**

### **2. Mandatory Grievance Redressal System**

**There should a robust multichannel complaint system including In-app, Web and call centre. There should a nodal officer stationed in India and her contact details should be easily accessible to the consumer. There should a fixed time-line for the resolution of grievance and this should be trackable in the App and on the website.**

**There should be multi-level escalatory mechanism**

### **3. Content compliance**

**The Application Provider shall ensure that all content complies with Programme Code and Advertising code. The Application Provider undertake due diligence before onboarding channels so that they conform the regulations and laws in India. They would also develop suitable mechanisms for monitoring content.**

Further, in the event of a complaint regarding unlawful and harmful content, it would be considered and suitable action taken according to timeline.

#### 4. Advertisement Regulation

All advertisements should comply with the applicable laws and guidelines including those pertaining Misleading Advertisements and the Consumer Protection Act.

There should also reasonable limits on the advertisements that is served, with the threshold level being specified by the regulator from time to time.

#### 5. Data Protection and Privacy

The Application Provider should comply with the THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023 and other relevant regulations that are applicable.

Specifically the Application Provider should collect only necessary user data and provide a clear and accessible privacy policy. The Application Provider should avoid the use of dark patterns for for obtaining consent or usage. The Guidelines for Prevention and Regulations of Dark Patterns, 2023 should be adhered to. The consumers shall have the right to deletion of their data in addition to other rights. In the case of targeted advertising explicit consent of the consumer should be obtained.

#### 6. Quality of Service (QoS)

There should be clear Quality of Service (QoS) parameters that should be complied with, failing which their would be penalties that would be levied and consumer compensated. In addition in case of major outages, consumer should be notified and corrective action taken within the stipulated time period.

#### 7. Accessibility and Inclusion

The Application Provider shall make reasonable efforts to provide subtitles or captions for key content and regional language interfaces. The platforms shall be designed to support low-bandwidth usage where feasible.

#### 8. Harmful Content

The Application Provider shall comply with all relavent laws in this area. In addition they shall implement safeguards against obscene or harmful content and content targeting the Children. Where applicable, Parental Control features shall be provided.