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CG Response-TRAI-CONSULTATION PAPER No/ 02/2026

Date – 21/04/2026

Subject: Comments on Consultation Paper on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services

Consumer Guild (CAG Member) respectfully submits its comments on the Consultation Paper on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services.

At the outset, we submit that ALTD services are increasingly functioning as substitutes for traditional television distribution platforms. Therefore, it is important that a clear and technology-neutral definition is adopted to distinguish such services from purely on-demand OTT platforms, in order to avoid ambiguity and ensure regulatory clarity.

Consumer Guild is of the considered view that there is a need for an appropriate regulatory framework for ALTD services. While these services promote innovation and enhance consumer choice, the absence of basic safeguards may lead to concerns relating to transparency, service quality, and grievance redressal. Accordingly, a light-touch, proportionate, and principles-based regulatory approach may be adopted, ensuring consumer protection without imposing undue compliance burdens.

We further submit that where ALTD services offer functionalities similar to traditional distribution platforms, there should be a level playing field in terms of consumer protection. Consumers should receive comparable safeguards irrespective of the mode of service delivery.

From a consumer perspective, the following safeguards are essential:

- **Transparent disclosure of subscription charges, including all applicable components and conditions**
- **Avoidance of misleading practices and hidden charges**
- **Minimum standards for quality of service, including reliability and continuity**
- **A simple and time-bound grievance redressal mechanism**
- **Clear and easily understandable terms and conditions**

It is also important that basic Quality of Service standards are ensured. Consumers should be clearly informed about service requirements, including dependency on internet connectivity, and responsibilities for service deficiencies should be appropriately defined.



Consumer Guild emphasizes the need for a structured grievance redressal mechanism, enabling consumers to register complaints easily and obtain resolution within defined timelines. Provision for escalation beyond the platform may also be considered to ensure accountability.

Consumer data privacy is another critical aspect. ALTD platforms should follow transparent data practices, obtain informed consent, and ensure that data collection is limited to necessary purposes. Consumers should have clear control over the use of their data.

With regard to content, it is submitted that where linear television content is being distributed, applicable content standards should be adhered to. Availability of parental controls and content classification mechanisms would further safeguard consumer interests.

Consumer Guild also submits that consumer choice should not be restricted through platform or device limitations. Interoperability should be encouraged, and practices such as forced bundling should be avoided.

In terms of regulatory approach, a simple registration-based framework may be considered appropriate, as it would ensure accountability while avoiding high entry barriers.

In conclusion, while ALTD services offer flexibility and convenience, it is essential that their growth is supported by a framework that ensures transparency, fairness, and protection of consumer rights. The regulatory approach should remain consumer-centric while promoting innovation and healthy competition.

We hope that the above submissions will be given due consideration.

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