



May 11, 2025

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New Delhi-110029**

Sub: Response of Dish TV India Limited to the Consultation Paper on Formulation of a Regulatory Framework for Application – based Linear Television Distribution (ALTD) Services (including Free Ad supported streaming Television (FAST) Services) dated 06.04.2026

Dear Sir,

We hereby submit our response to the TRAI the Consultation Paper on formulation of a Regulatory Framework for Application – based Linear Television Distribution (ALTD) Services (including Free Ad supported streaming Television (FAST) Services) dated 06.04.2026.

Please find enclosed the same.

Thanking you,

Yours truly,
For **Dish TV India Limited**


**Shivendra Krishna Singh
Authorized Signatory**

Encl: a.a

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Response of Dish TV India Limited to the Consultation Paper on Formulation of a Regulatory Framework for Application – based Linear Television Distribution (ALTD) Services (including Free Ad supported streaming Television (FAST) Services) dated 06.04.2026

At the outset, we express our sincere gratitude to the Authority to come up with the present consultation paper which was long needed considering the fact that the FAST channels are now in business for a considerable length of time in an environment where there is a complete regulatory vacuum.

In this regard it is important to note that the Up-linking and downlinking Guidelines have been amended thrice but despite such changes, the essence has remained the same. The Guidelines mandated the presence of an Indian entity, security clearances, disclosure of ownership and control, and adherence to the Programme and Advertisement Codes. Through these measures, the Guidelines sought to safeguard national security and public order, enable effective enforcement against content violations, create an orderly and transparent broadcasting ecosystem.

But since there was no prompt cognisance along with the emergence of FAST channels, the business mushroomed in no time, effectively putting us in the same scenario where we were before the issuance of the Up-linking and downlinking Guidelines. The current consultation paper, therefore, is definitely a welcome move.

What followed the growing trend of FAST channels was that even permitted satellite television channels also started to be distributed on ALTD Services. As a matter of fact, all major news channels, are presently available on most of the smart television. However, it is a matter of fact that while being distributed on ALTD Service, all these permitted channels do not adhere to prescribed guidelines w.r.t advertisements. In this regard, attention is invited to the Advisory dated 11.12.2017 issued by the Ministry of Information and Broadcasting prohibiting advertisement of condoms between 6:00 AM and 10:00 PM to prevent children from being exposed to indecent or inappropriate content. However, this regulations are flouted rampantly by these permitted channels which exhibit repeated advertisements of such products.

We also take this opportunity to also highlight that the advertisements shown on the major OTT platforms also follow the same trend where the advertisements during intervals of even 13+ contents also violate this provision. This also needs immediate attention as the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 (as amended in 2026) does not, at least not specifically, regulate the advertisements played during intervals on the OTT platforms.

The broadcasters may contend that they only provide the feed and that the advertisements are inserted by other entities. However, this creates a regulatory anomaly where the same channel, when distributed through licensed DPOs, complies with Programme and Advertisement Codes, but when distributed through ALTD Services, such regulatory provisions are effectively bypassed.

Therefore, for any and all content are allowed to be distributed through ALTD services, whether as FAST Channel or otherwise, the content provider should be mandated to be registered as a broadcaster to ensure compliance with the provisions of Policy Guidelines for Up-linking and Downlinking of Television Channels, 2022 and other applicable provisions. Further, the entity distributing such channels i.e. ALTD Service Providers, should also be brought under the regulatory framework applicable to Distribution Platform Operators. This will ensure that not only the content and the advertisements but the distribution thereof are in compliance with the same regulatory standards irrespective of the mode/medium/platform through which they are delivered to the viewer.

It is respectfully submitted that the Policy Guidelines for Up-linking and Downlinking of Television Channels, 2022 also regulate the manner in which television channels are distributed to viewers. In this regard, Clause 11(3)(f) of the Guidelines provides as under:

“The permission holder shall provide satellite TV channel signal reception decoders only to MSOs/Cable operators registered under the Cable Television Networks (Regulation) Act, 1995 or to DTH operators registered under the applicable DTH guidelines issued by the Government of India.”

The intent of this provision is to ensure that television channels are distributed only through authorised and licensed distribution platforms so that the entire broadcasting chain remains within the regulatory framework.

In the changed mechanism,, it is suggested that necessary amendments may be made therein to ensure that the entity distributing the permitted channels through ALTD services, should be registered as a distribution platform operator and be subjected to the same regulation as prescribed for the similarly placed entities in the broadcasting regime.

In the above backdrop, we provide our response to the Consultation Paper as under:

- 1. 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.**

Response: Any person/entity who is involved in the process of distribution of either linear content should be considered as a distribution platform operator. To ensure that the legal mandate in respect of the manner of distribution of either linear content is complied by all DPOs, same legal mandate should be applied on such platforms also which are engaged into ALTD services.

It may however be noted that the Authorisation Recommendation dated 21st February, 2025 does not define the term Distribution Service while it defining Distribution Service Provider. Therefore, TRAI should either define the term Distribution Service including therein the category of distribution of channels by Application Providers or web-based platforms over the internet along with DTH, HTS, IPTV and MSO while including ALTD Service Providers within the definition of Distribution Service Providers.

2. **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.**

Response: We align with this suggestion that the application provider appears to play a central role in the distribution of linear television channels across various business models.

It is stated that the entire television distribution industry has been set up with three stakeholders which are broadcasters, DPOs and the consumer. The currently existing legal mandate prescribes that the broadcaster will have a separate authorization and the DPOs will have a separate authorization. The same process should be continued in the changed technological era where any entity engaged in creation/aggregation of content for linear distribution, should be covered under the definition of 'broadcaster' whereas the platform/application through which the contents are distributed should be covered under 'Distribution Service Provider', which terms are defined in the Authorisation Recommendation dated 21st February 2025.

In all the four business models mentioned in the CP, it is the Application Provider which actually acts as a distributor of the channels. The Paper under response also elaborates that it is in fact the Application Providers who aggregates the channels and other on-demand content and distribute over wired or wireless network through multiple device categories like mobile, TV, tablets etc. Therefore, in our view the Application Provider should be made responsible for obtaining necessary authorizations for distribution of the permitted channel. Making authorization as mandatory is all the more required because we have seen that in some cases while the television distributor are from the India but the Application Provider is based overseas where the Indian

entity neither has any control over the content nor has any share in the revenue generated out of distribution of the channels through ALTD services.

3. 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 covering, though 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?

4. 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
5. What should be the specific terms and conditions applicable 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 made applicable 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.

Response: The Consultation Paper itself recognises that ALTD services distribute linear television channels over the internet irrespective of the type of devices and these services are functionally similar to traditional television distribution platforms such as DTH, HITS, IPTV and MSO. However, since ALTD services are accessible nationally without territorial limitation, a circle-wise or area-specific licensing framework like MSO or ISP would be impractical and inconsistent with the nature of the service. We therefore suggest a pan-India authorisation framework for ALTD services which are more or less aligned with DTH/HITS services. This will also ensure regulatory parity, level playing field and uniform compliance obligations.

As regards the query regarding compulsory transmission of certain Prasar Bharati channels, we believe that such requirement must be removed even for the traditional DPOs like DTH, HITS, MSOs and IPTV services as the very purpose of the same has outlived. However as long as the same is not done, the same provision should be made applicable for ALTD Service Providers.

W.r.t the other requirement i.e. mandatory sharing of Sports Broadcasting Signals, it is stated that same is applicable for broadcasters and not on DPOs and once it is mandated that the ALTD Service Providers would be required to get content only and only from registered broadcasters, the said requirement would automatically be complied with.

- 6. What type of assurance or certification mechanism should be prescribed for television manufacturers and operating system providers to ensure**

that applications provisioning ALTD services, (whether pre-integrated with television sets or made available for download through application stores or web platforms) are duly authorised by MIB.

Response: It is submitted that television manufacturers and operating system (OS) providers are already subject to various statutory and regulatory compliance requirements prior to commencement of operations and also during the course of their business activities. For instance, television manufacturers are required to obtain mandatory BIS certification, comply with applicable energy efficiency standards and safety requirements, while operating system providers are required to comply with data protection, cybersecurity and other applicable legal and regulatory obligations. In the similar manner, television manufacturers and operating system providers should be mandated to ensure that only authorised Application Providers are onboarded (pre-installed, hosted or made accessible) on their television sets, operating systems or application ecosystems. Such entities should therefore be required to verify the validity of the authorisation/licence granted to the concerned Application Provider before permitting integration or access to their platforms. This would ensure regulatory compliance, prevent unauthorised distribution of linear television channels and strengthen accountability within the ALTD ecosystem. The Authority should prescribe yearly compliance audit for these stakeholders to ensure continuous compliance by them of these requirements.

- 7. What kind of assurance mechanisms should be instituted to ensure that the applications providers authorised for provisioning ALTD services carry only those channels which are authorised/permitted by MIB for distribution in India. What kind of penalty/disincentive/deterrent be instituted for non-compliance?**

Provide your comments with justification.

Response: As stated hereinbefore, the Application Providers should be made responsible for obtaining necessary authorizations as per the due procedure as it is primarily this entity which aggregates the channels and other on-demand contents and then distribute such content/channels over wired or wireless network through multiple device categories like mobile, TV, tablets etc. This is akin to the functions and operations of a licensed distribution platform operator. Therefore, the Application Providers should be made subject to audit requirements as provided under section 15 of the Interconnection Regulations. This will not only ensure parity and level playing field across the value chain but also ensure that the Applications Providers, authorised for provisioning ALTD services, carry only those channels which are authorised/permitted by MIB for distribution in India and that any non-compliance in this regard will be dealt in terms of the provisions of the Interconnection Regulations only.

8. **Whether there is a need to prescribe any specific terms and conditions for value-added services offered by ALTD service providers? If yes, what should be the terms and conditions?**

Stakeholders are requested to provide their detailed comments with justification.

Response: This should be same as prescribed for DPOs.

9. **Whether the broadcasters/content owners providing or intending to provide television channels on ALTD platforms operating in India be mandated to obtain authorisation either for:**

- **Satellite-based Broadcasting and/or**
- **Ground-based Broadcasting**

along with its applicable terms and conditions, before entering into the agreements with authorised entities provisioning ALTD services to consumers? If yes, provide reasons with justifications.

Response: Broadcasters, being already permitted under the Policy Guidelines of 2022 for distribution of satellite TV channels should not be required to take any further permission for digital transmission of the same channels over internet. Instead, necessary amendment may be made in the Policy Guidelines of 2022 to also include digital transmission of the channel in the same permission applicable for satellite transmission. For the existing permissions, the same may be made applicable on the next renewal or upon applications of the broadcasters.

However, all other content providers, not being a broadcaster, should be should be made subject to the same requirement like an existing broadcaster. Therefore all such content providers should be mandated to take permission under Policy Guidelines as per the procedure mentioned. Idea is to ensure complete parity, non-discrimination and parity across the entire value chain while also ensure ensuring compliance by every entity without exception. This will also ensure that the content is also in line with the prescribed norms.

10. **In view of the availability of the pay television channels on ALTD platforms, what pricing methodology should be adopted for price parity of television channels across these platforms? Please provide detailed justification for your response.**

Response: Same as applicable for a channels under TRAI Regulation. As suggested above, no entity should be allowed to flout the applicable laws in the garb of different technology and different medium. This is not only against the very principle of equality before law where there is no reasonable exception but

it will simultaneously plug the loopholes for the errant to evade compliance requirement.

11. **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.**

Response: Currently all the DPOs comply with the QoS requirement as prescribed by TRAI which ensures consumer protection and provides mechanism for grievance redressal. Therefore if the ALTD Distributors are treated as DPOs, they will be brought within the same rules and regulations as applicable for the DPOs. This will automatically take care of every concern w.r.t the consumers. We understand that there may be some variation due to difference in the technology. There may be catered by way of some amendment in the QoS Regulation as and when needed.

12. **With the revised guidelines now including multiple viewing platforms in audience measurement, stakeholders are requested to furnish their comments on the right methodology for integrating ALTD service data into the television ratings framework, as well as the proposed timelines for implementation, supported by detailed justifications.**
13. **Under the revised guidelines, television distribution platforms and/or OTT platforms may publish periodic viewership data of broadcasters/channels they carry on their platforms and/or on their websites, without prior registration. In this context, stakeholders are invited to provide their comments on how such an enablement can be aligned with the proposed authorisation framework for application providers provisioning ALTD services, along with any related considerations.**

Response: The data captured in the digital environment is much more than what is captured by BARC in the conventional method. Therefore there should not be any challenge for publication of viewership data by an ALTD Service Provider. As there has been no requirement for the television distribution platforms and/or OTT platforms to publish periodic viewership data of broadcasters/channels and also the fact that such data is generated directly from actual user interactions on the platform, there should not be any restriction on publication of periodic viewership data by ALTD Service Providers in respect of broadcasters/channels available on their platforms.

We should also not forget that despite having policy in place for the longest time, the authenticity of the data published, earlier by TAM and now by BARC, has always been in dispute. Still to remove any/all apprehension regarding the authenticity of data published by ALTD Service Providers, Authority may prescribe audit of such data by a TRAI empanelled Auditors.

14. **Considering the scenario wherein application providers provisioning ALTD services may adopt a hybrid business model offering free and/or paid services, stakeholder comments are invited on how such services should be subject to the regulatory framework, particularly with respect to tariff, interconnection and quality of service aspects. Please provide your comments with justification.**

Response: Once the ALTD services are brought within the same regulatory prescription, any and all the offering by them will have to be in compliance with the same. Therefore the FAST channels (post MIB permission) will be offered as FTA channels as currently prevailing whereas pay channels (post MIB permission) will be required to be offered as pay channels. Consequently all regulatory provisions will be applicable in the similar manner.

15. **Any other Issue Whether there are other issues (such as channel positioning on home screen, EPGs, revenue sharing, interconnection agreements including marketing and placement agreements, etc.), not specifically covered in this consultation paper, which may be relevant for consideration while formulating the regulatory framework for ALTD services? Stakeholders are also requested to share relevant international best practices or regulatory approaches, if any, along with appropriate justification.**

Response: None.