

**COMMENTS OF
EENADU TELEVISION PRIVATE LIMITED
TO
TELECOM REGULATORY AUTHORITY OF INDIA'S
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 – 6TH APRIL 2026

Dt 11-05-2026

To
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Respected Madam,

We are pleased to enclose herewith Eenadu Television Private Limited's comments to Telecom Regulatory Authority of India's ("TRAI" / "Authority") consultation paper dated 06-April-2026 on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services) ("Consultation Paper under response")

Eenadu Television Private Limited ("ETPL") takes this opportunity to thank the Authority for allowing stakeholders to submit their comments on issues raised in Consultation Paper under response. ETPL has been a pioneer in regional broadcasting, delivering culturally rooted, high-quality Telugu Language programming across genres including entertainment, news, infotainment, kids, and special events. As an active participant across both traditional and digital distribution ecosystems, we recognise the significant potential of ALTD/FAST services in expanding reach, particularly for regional content. At the same time, the evolving nature of this segment necessitates a balanced, forward-looking and light-touch regulatory approach, ensuring that innovation, investment and consumer choice are not constrained at a nascent stage.

At the outset, it is submitted that ALTD/FAST services operate in a fundamentally different technological, economic and consumption environment compared to traditional broadcasting platforms. While concerns relating to transparency, discoverability and fair competition merit consideration, these may be addressed through principle-based safeguards rather than prescriptive regulation. However, it cannot be denied that such services are increasingly performing functions analogous to traditional distribution platform operators (DPOs). **Accordingly, a regulatory framework to the extent of ensuring parity, non-discrimination, and platform accountability is essential to prevent market distortion and protect content providers, particularly regional broadcasters.** Thus we also propose that all Application Providers (APPs) must be subject to clear regulatory obligations mandating parity in content availability, discoverability, and commercial treatment, and must refrain from any form of arm-twisting or discriminatory practices against content providers. It is important that any framework avoids regulatory duplication on broadcasters, who are already governed under extensive content and advertisement norms, and instead focuses on platform-level accountability, where necessary.

However, it is further submitted that all content providers, other than licensed television channel broadcasters, should be subject to appropriate regulatory guidelines, including adherence to applicable programming and advertisement codes. Additionally, content made available by such providers should be duly monitored and brought within the ambit of applicable censorship guidelines, so as to ensure compliance with extant content-specific regulatory provisions.

We also like to submit that a level playing field must be ensured across the broadcasting and digital distribution ecosystem, and therefore:



Handwritten signature and circular stamp of EENADU TELEVISION PRIVATE LIMITED, HYDERABAD.

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Registered Office: SP3 Building, Ramoji Film City, Anajpur Village, Hyderabad,
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- (i) All platform operators (APPs) shall be subject to regulatory obligations ensuring parity in content availability and treatment
- (ii) Any form of favouritism, preferential placement, or suppression of competing content must be strictly prohibited.

While we recognize the transformative potential of ALTD/FAST services in enhancing content accessibility, it is equally critical to ensure that the given current market senarion it is important to fosters fair competition, transparency, and sustainability, in this segment. Thus we are of the primary opinion that the ALTD/FAST ecosystem should, at this stage, be governed through a light touch regulatory approach where registration of Application Providers shall be subject to licensing requirements, allowing market forces, competition, and industry-led self-regulation to drive growth, innovation, and consumer outcomes.

However, without prejudice to this position, and only in the event that a regulatory framework is considered necessary, it is submitted that such framework should be minimal, facilitative, and designed to ensure seriousness of participants and accountability, rather than impose operational restrictions.

We would further like to submit that ALTD services are still evolving and imposing legacy-styled regulations may prematurely restrict their potential. Thus, highly regulating the ALTD/FAST Services ecosystem may lead to:

- (i) Reduced incentives for platform innovation and investment
- (ii) Constraints on content experimentation and regional expansion
- (iii) Increased compliance for broadcasters

A review of global regulatory approaches across jurisdictions such as the United States, China, Japan and the European Union demonstrates a consistent preference for light-touch or self-regulatory regimes for ALTD/FAST-type services. These markets typically do not impose tariff regulation, pricing controls, or rigid discoverability mandates, and instead rely on market forces, competition law, and industry-led governance frameworks. Regulatory focus, where applicable, remains limited to consumer protection and harmful content safeguards, reflecting a recognition that internet-based television ecosystems require flexible and adaptive regulatory treatment.

This global approach is further supported by leading policy bodies and industry analyses, including OECD, European Commission (AVMSD), Ofcom, FCC, GSMA, ITU, Deloitte and PwC, which consistently highlight that over-regulation of digital video markets may hinder innovation and reduce consumer welfare. The key takeaway across jurisdictions is clear—regulatory forbearance, supported by self-regulation and competitive market dynamics, is best suited for such ecosystems. In this context, it is respectfully submitted that India may adopt a similar facilitative approach, while addressing specific concerns in a proportionate and evidence-based manner in the responses set out below.

Definition of Scope of ALTD

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.

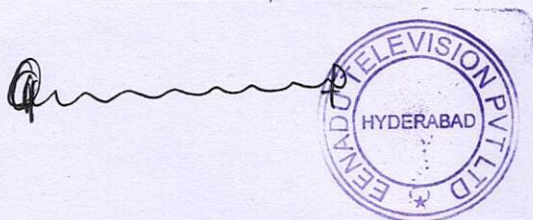
Response:

ALTD services may be defined in a broad, technology-neutral manner as:

"Application-based platforms that delivering scheduled, linear television-like content over the internet, including Free Ad-Supported Streaming Television (FAST) channels."

It is important to distinguish ALTD services from:

- On-demand OTT content
- Traditional cable/DTH services



A flexible definition ensures future readiness, clear classification will help in **targeted and proportionate regulation**. While formulation a definition it also be considered that global practice supports non-prescriptive classification, further the scope of definition should remain non-restrictive, allowing hybrid and evolving models

Primary Stakeholder

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) whoshould be responsible for obtaining such authorisation, alongwith rationale.

Response:

An **authorisation system shall introduced**, wherein the **APPs** may be considered as the primary interface with the consumer and may therefore be identified for compliance purposes. Application Providers / Aggregators shall be designated as the **primary regulated entities**, with **explicit obligations** to:

- (i) Ensure **non-discriminatory access to all content providers**
- (ii) Maintain **parity in onboarding, placement, and commercial terms**
- (iii) **Refrain from coercive or arm-twisting practices**, especially against regional broadcasters

As the Application provider is the **aggregation and distribution point. This will ensure single-point accountability**, and will help in regulatory overweight on multiple ecosystem players. In present scenario Application Providers are performing roles analogous to that of distribution platform operators like MSO, DTH, HITS, IPTV, therefore, a regulatory framework is envisaged, regulatory obligations should logically be attach to the Application Provider, rather than to upstream or downstream entities.

Further we would like to submit that broadcasters should remain completely outside the scope of ALTD authorisation requirement since broadcasters and content providers are already subject to the existing licensing and compliance frameworks, Programme and Advertisement Codes, thus imposing additional authorisation requirements on broadcasters for ALTD distribution would, lead to duplication of regulation and increase compliance burden without corresponding benefit.

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?

Response:

Without prejudice to our broader position favouring a calibrated and facilitative approach, be humbly submit that **an authorisation framework shall be introduced for ALTD services**, wherein the **entry conditions should be stringent and credibility-focused**, rather than operationally restrictive.

Further, it is submitted that the registration requirements for Application Providers should be brought at par with those applicable to DTH, HITS and IPTV service providers. Such framework should, inter alia, incorporate a "must carry" obligation and mandate that Application Providers extend fair, non-discriminatory and non-biased access to all content providers. This would ensure (i) parity in content placement and availability, (ii) non-discriminatory commercial terms across all content providers, (iii) transparency in algorithms, recommendations, and discoverability thus nurture a level playing field for all stakeholders and prevent gatekeeping or preferential treatment within the emerging ALTD/FAST ecosystem.

- (i) **Service Area** shall be Pan-India without fragmentation, since digital nature of ALTD services will require uniform national authorisation.
- (ii) **Validity:** 10–15 years, subject to compliance-based renewal
- (iii) **Eligibility:** Mandatory incorporation/registered presence in India with full legal and ownership disclosures
- (iv) **Minimum Net Worth:** High and stringent net worth requirement, at par or higher than broadcasters/DPOs, to ensure participation of serious and well-capitalised entities
- (v) **Processing & Entry Fee:** Reasonable but substantive to ensure commitment
- (vi) **Bank Guarantee & Security Deposit:** Mandatory at meaningful levels to secure compliance
- (vii) **Authorisation Fee:** Fixed or modestly revenue-linked
- (viii) **Roll-Out Obligations:** Limited to basic operational readiness timelines
- (ix) **Foreign Entities if allowed then the following shall apply**
 - (a) Permitted only through **Indian incorporated entity or local partnership/JV**
 - (b) Mandatory compliance with **FEMA, FDI policy and all applicable Indian laws**
 - (c) Full disclosure of **ownership and control structure**

We are of the opinion that the above narrated approach will ensure **entry of credible players, enhances accountability, and supports domestic ecosystem development in line with "Make in India" objectives**, while avoiding excessive ongoing regulatory intervention.

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**

Response

Without prejudice to our overarching position favouring a light-touch, forbearance-based approach, it is submitted that any common terms and conditions for ALTD services should be primarily applicable to the




Application Provider (platform operator) as the point of aggregation and consumer interface. Renewal of authorisation may be automatic and compliance-based, with applicable fees; equity and ownership requirements should be incorporated including but not limited to broad disclosures in line with existing FDI/FEMA norms; and provisions relating to transfer/surrender and infrastructure sharing should remain flexible and market-driven. No prescriptive restrictions are recommended on cross-holdings, as such matters are adequately addressed through competition law and market dynamics.

We would also like to submit that while maintaining operational flexibility, certain core obligations must be mandatorily enforced, including:

- (i) Non-discriminatory treatment of all content providers
- (ii) Mandatory parity in pricing, placement, and technical quality
- (iii) Transparency in platform policies, revenue sharing, and content discovery mechanisms

It is further submitted that broadcasters should remain outside the scope of such conditions, as they are already comprehensively regulated under applicable frameworks including the Cable Television Networks (Regulation) Act, 1995 (Programme & Advertisement Codes), MIB Uplinking/Downlinking Guidelines, and the Information Technology Act, 2000, along with self-regulatory codes. Accordingly, any residual obligations (if at all required) should rest solely with the Application Provider, ensuring no duplication of regulatory burden while preserving flexibility, innovation, and ease of doing business.

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.


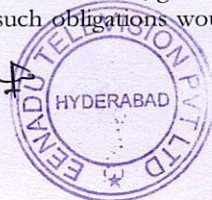
Response

Requirements relating to reservation of channel capacity, platform services, monitoring/inspection, and supply of information should be **disclosure-based, and invoked only where necessary**, avoiding prescriptive operational controls. It is submitted that platform conduct must be subject to enforceable regulatory safeguards, particularly in relation to:

- (i) Content placement and discoverability
- (ii) Platform services and self-preferencing
- (iii) Fair access and non-discriminatory carriage

Further, must-carry provisions (as applicable to traditional platforms) should be extended, mutatis mutandis, to ALTD services to ensure equitable distribution.

It is further submitted that **legacy broadcast obligations such as mandatory sharing of sports signals with Prasar Bharati and compulsory carriage of channels (as applicable to DTH/HITS/IPTV) should not be extended to ALTD services**, given their fundamentally different, internet-based and on-demand nature. Imposition of such obligations would be **disproportionate and may distort business**

models, particularly when broadcasters are already governed under comprehensive content and carriage-related regulations.

Q6. 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:

We would to humbly submit that given the technical nature of certification requirements, it is recommended that any detailed framework in this regard be developed through a separate, focused consultation process with involvement of **the Ministry of Electronics and Information Technology (MeitY)**, so as to ensure alignment with existing certification norms and practices applicable to similar digital and platform-based service providers in India, and to create a robust, harmonised and technically sound framework. However focus while framing such requirements it may be considered that no onerous certification mechanism should be imposed on television manufacturers or operating system providers. Instead, a **simple self-certification / declaration-based framework** may be adopted, wherein Application Providers certify that their services are duly authorised (if such authorisation regime is introduced), and such information may be made available through a **centralised registry/whitelist maintained by the Ministry of Information & Broadcasting (MIB)**.

Television manufacturers and OS/app store providers may rely on such **centralised registry or API-based verification**, without being required to undertake independent compliance checks. This approach ensures **ease of implementation, avoids regulatory burden on hardware and technology layers**, and appropriately places responsibility on the **Application Provider (platform operator)**, which is the primary point of control and accountability in the ALTD ecosystem.

Q7. 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:

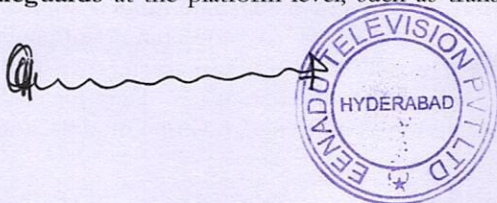
A **self-declaration framework**, supported by periodic compliance certification, may be adopted wherein Application Providers confirm that they carry only those channels which are duly authorised/permitted by the Ministry of Information & Broadcasting (MIB). Enforcement (if any) should be limited to **graduated, proportionate penalties on Application Providers** for non-compliance (such as warning, monetary penalty, and suspension in extreme cases), while **avoiding any extension of regulatory obligations to broadcasters**, ensuring no duplication and preserving a balanced, growth-oriented framework.

Q8. 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:

We would like to submitted that **no specific terms and conditions shall be mandatorily required to be prescribed for value-added services (VAS)** offered by ALTD service providers at this stage. Such services are inherently **innovation-led, dynamic, and consumer-driven**, and any prescriptive regulation may inadvertently restrict product development, differentiation, and investment in this evolving ecosystem.

In the event any framework is considered necessary, it may be limited to **broad, principle-based safeguards** at the platform level, such as transparency in service offerings, clear user disclosures, and



adherence to applicable laws. It is further submitted that content forming part of VAS, where relevant, would continue to remain subject to existing content and advertisement regulations applicable to broadcasters, and therefore, no additional or duplicative regulatory obligations should be imposed. Accordingly, a self-regulatory approach with platform-level accountability would be sufficient to address any concerns while preserving flexibility and growth.

Q9. 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

We would like to humbly submit that in the context of broadcaster interests, it must be recognised that linear television feeds and content are already governed under comprehensive regulatory frameworks, including the Cable Television Networks (Regulation) Act, 1995 (Programme & Advertisement Codes), MIB guidelines, and other applicable laws. Accordingly, any additional or duplicative content-level regulation at the ALTD Services layer may adversely impact market sentiment and hinder the growth of this evolving ecosystem.

However, it is further submitted that all content providers, other than licensed television channel broadcasters, should be subject to appropriate regulatory guidelines, including adherence to applicable programming and advertisement codes. Additionally, content made available by such providers should be duly monitored and brought within the ambit of applicable censorship guidelines, so as to ensure compliance with extant content-specific regulatory provisions

Q10. 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.


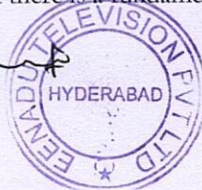
Response:

ALTD services represent an emerging, complementary distribution avenue with distinct formats, audience cohorts, and consumption patterns, rather than a direct substitute for traditional linear television distribution. In event if pay television channels in their original, linear form and / or any the content from such channels is curated, repackaged, or delivered under distinct formats and business models (including FAST and hybrid models), then in such cases pricing parity and treatment parity must be a regulatory obligation. Considering that the target audience, consumption behaviour, and delivery mechanisms for ALTD services are significantly different from those of traditional television distribution platforms and given the rapidly evolving market dynamics, where:

- (i) Advertising revenue is increasingly replacing subscription revenue, and
- (ii) Pay content is often made available free of cost on ALTD/FAST platforms under hybrid models,

there is a significant risk of market distortion and revenue erosion for traditional broadcasters.

Broadcasters typically do not make their pay television channels available in the same linear form on ALTD platforms; instead, content is adapted, curated, or monetised through alternate models such as advertising-supported streams or hybrid offerings. Additionally, the cost structures and input economics for ALTD services differ materially from traditional broadcasting and distribution ecosystems, including variations in infrastructure, content acquisition, and monetisation strategies. Thus for such specifically curated content there is a fundamental differences, in target audience, revenue models, and

underlying cost structures, mandating price parity for such content would be **commercially impractical, misaligned with market realities and counterproductive**. Accordingly, pricing for such fostered content should remain **left open to be decided by market forces and commercial negotiations**, allowing broadcasters the flexibility to optimise content strategies across platforms, while ensuring **consumer choice and continued growth of the ALTD ecosystem**.

However, it is further submitted that in the event any licensed pay satellite television channel is made available on ALTD services in its original linear form, then the pricing parity requirements as applicable to such channels on traditional distribution platforms should *mutatis mutandis* apply to such services as well. This should include adherence to prescribed MRP-based pricing frameworks and all applicable regulatory provisions governing channel pricing. Additionally, such channels should be carried by platform operators on a non-discriminatory basis, ensuring parity in treatment across similarly placed channels in terms of language and genre, no platform aggregator should be allowed to offer differential or preferential treatment to select content providers. It is further submitted that similarly placed services and content providers must be treated equitably by all such platform operators, so as to uphold fair competition and prevent any discriminatory or preferential conduct within the ecosystem.

Consumer Protection

Q.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:

We would like to respectfully submit that obligations relating to consumer protection and grievance redressal for ALTD services should remain platform-centric, flexible, and technology-neutral, given the multiplicity of access modes (smart TVs, mobile applications, web platforms, etc.). Application Providers may be encouraged to implement internal grievance redressal mechanisms, including clear user interfaces for complaint lodging, defined resolution timelines, and transparent communication, supported by self-regulatory principles rather than prescriptive regulation.

Further, considering the technical complexity and evolving nature of digital service delivery, it is submitted that a separate and detailed consultation process may be undertaken specifically on consumer protection, technical standards, and quality of service parameters, with active involvement of the Ministry of Electronics and Information Technology (MeitY). Such a collaborative approach would enable formulation of a robust, future-ready, and consumer-friendly framework, aligned with existing digital ecosystem standards in India, while avoiding premature or fragmented regulatory prescriptions in the present consultation.

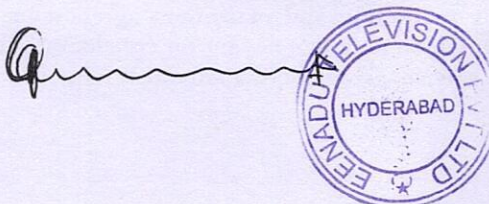
Audience Measurement

Q.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.

Response:

We would like to submit that integration of ALTD services into the existing television ratings framework shall not be envisaged at this juncture. The ALTD ecosystem is fundamentally distinct from traditional television, both in terms of content formats and consumption patterns. ALTD services typically cater to specific, segmented audiences, often skewed towards different age groups and usage behaviours compared to the broader and more uniform audience base of traditional television.

Further, the quantum, nature, and measurement of viewership in ALTD environments differ significantly, being driven by *on-demand, app-based, and personalised consumption*. In contrast, television ratings are designed



to capture linear, mass-viewing behaviour. Accordingly, any attempt to integrate ALTD data into the television ratings ecosystem at this stage would be premature and may dilute the integrity and purpose of television audience measurement. It is therefore submitted that ALTD services should continue to evolve under separate, platform-specific measurement frameworks, until such time that methodological convergence, if any, becomes viable and industry-validated.

Q13. 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:

In this regard our response to Q12 above shall be considered additionally, the proposed enablement for platforms to publish periodic viewership data may be aligned with the ALTD authorisation framework through a light-touch, disclosure-based approach, without requiring prior registration or approval. Application Providers may be permitted to publish such data subject to basic principles of transparency, accuracy, and non-misrepresentation, with appropriate disclaimers regarding methodology and scope of data.

It is further submitted that, given the distinct nature of ALTD ecosystems and absence of standardised measurement methodologies, such disclosures should remain voluntary and platform-specific, and should not be treated as a substitute for or directly comparable with traditional television ratings. Any compliance obligation, if at all required, should rest solely with the Application Provider, without extending any additional burden on broadcasters. This approach would ensure transparency and innovation in data reporting, while preserving flexibility and avoiding premature standardisation or regulatory overlap.

Future consideration for 'ALTD Services'

Q14. 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.

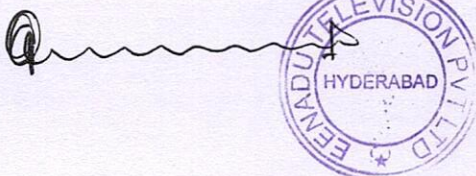
Response:

In this regard we would like to draw attention to our submission to Q10 and additionally we would also like to submit that hybrid models adopted by ALTD service providers (offering free and/or paid services) should be subjected to tariff, interconnection, or prescriptive quality of service regulations applicable to traditional television distribution platforms. Even though it may be contested that such models operate on fundamentally different commercial constructs, including advertising-led (FAST), freemium, and subscription-based offerings, with dynamic pricing, bundling, and content strategies tailored to diverse consumer segments, but the content being offered by such services remains somehow the same.

Thus all such hybrid models being offered by playfrom aggregators shall be brought within a structured regulatory framework, ensuring, (i) Parity across distribution modes, (ii) Non-discriminatory access and monetisation opportunities and (iii) Prevention of free-riding on regulated content ecosystems.

Any other Issue

Q15. 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:

It is respectfully submitted that issues such as channel positioning (home screen/EPG), revenue sharing arrangements, interconnection agreements, marketing and placement practices, etc., should be subjected to regulatory oversight in the context of ALTD services ensure, (i) Transparency, (ii) Non-discrimination and (iii) Fair competition.

All Application Providers must treat all Content Providers on a non-discriminatory basis, ensure complete parity across all operational and commercial aspects, and maintain full transparency in their dealings. Any deviation, including but not limited to differential pricing, biased discoverability, preferential placement, technical discrimination must be strictly prohibited to ensure a level playing field and protect the long-term sustainability of the broadcasting ecosystem, particularly regional content providers.

Thanking You,

Yours Faithfully,
For Eenadu Television Private Limited



Ch Chowdary M
Authorised Signatory

