

STAKEHOLDER COMMENTS
on the
TRAI Consultation Paper No. 02/2026
Formulation of a Regulatory Framework for
Application-based Linear Television Distribution (ALTD) Services
Including Free
Ad-Supported Streaming Television (FAST) Services
Submitted to: Telecom Regulatory Authority of India (TRAI)
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Submitted by:

Joydip Kapadia:- Distribution monitoring and Strategy and Content Intelligence expert

[+919820557193]

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Email: Joydip@insights3d.com

Karan Hora: Business Strategy specialities – Content, Distribution & Ad tech

+919833860110

Email: karan.hora1980@gmail.com

Preamble

These comments are submitted in response to the Telecom Regulatory Authority of India (TRAI) Consultation Paper No. 02/2026 dated 6th April 2026, on the Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services, including Free Ad-Supported Streaming Television (FAST) Services.

We welcome TRAI's initiative to bring much-needed regulatory clarity to a rapidly growing but currently unregulated segment of India's broadcasting ecosystem. The emergence of FAST and ALTD services represents a fundamental shift in how linear television content is consumed in India, yet these services currently operate without any licensing, content compliance, or consumer protection obligations — creating a significant regulatory gap and distorting competition.

Our comments are structured to address each of the 15 consultation questions in turn, preceded by a brief overview of our position and a summary table.

Background and Context

The Regulatory Problem

India's linear television distribution ecosystem is governed by a well-established framework covering Cable TV (MSOs and LCOs under the Cable TV Networks Act 1995), DTH services, HITS services, and IPTV services. All these distribution platform operators (DPOs) are required to hold licences or registrations, pay fees, comply with Programme and Advertising Codes, maintain grievance redressal systems, and follow TRAI's tariff regulations.

FAST/ALTD services, however, currently operate entirely outside this framework. They deliver the same linear television channels to the same consumers over the internet, but without any of the compliance obligations that licensed DPOs must fulfil. This regulatory arbitrage has several harmful consequences:

- It is unfair to licensed DPOs such as cable operators and DTH operators, who bear significant compliance costs while FAST platforms do not.
- It deprives consumers of the protection mechanisms they would otherwise be entitled to.
- It allows potentially unsafe, anti-national or non-compliant content to be broadcast without verification.
- It enables pay channels to be offered free of charge, undermining TRAI's tariff framework and eroding broadcaster revenues.
- It creates a situation where overseas entities control what content Indian viewers see, with no accountability to Indian regulatory authorities.

Scale of the Issue

According to market reports cited in the consultation paper, India already had 116.4 million FAST users in 2023, projected to reach 148.6 million by 2027. India is the fourth largest FAST market globally. The CTV audience base grew by 85% in just one year — from 69.7 million in 2024 to 129.2 million in 2025. With internet subscriber counts crossing 1 billion and data costs among the lowest in the world, ALTD adoption will only accelerate.

This makes the need for a clear, proportionate, and forward-looking regulatory framework both urgent and inevitable.

Our Overall Approach

We believe the regulatory framework for ALTD services should be guided by five principles:

1. **Technology neutrality** — The framework should be device-agnostic and platform-agnostic. Whether content reaches a viewer via a Smart TV, mobile phone, laptop or web browser should not determine whether rules apply.
2. **Functional equivalence** — Services that perform the same function as licensed DPOs should be subject to equivalent (though appropriately calibrated) obligations.
3. **Proportionality** — Regulatory requirements should be proportionate to the scale of operations and the risks involved, ensuring new entrants and smaller operators are not disproportionately burdened.
4. **Consumer protection** — Consumers must always be able to identify who is responsible for service delivery and have accessible channels for grievance redressal.
5. **Level playing field** — All entities distributing linear television channels to Indian consumers must operate under comparable regulatory conditions.

Alternative Perspective: Innovation-Friendly Regulatory Framework

Introduction

We welcome TRAI's effort to bring regulatory clarity to the ALTD/FAST ecosystem. However, we urge the Authority to approach this as an opportunity to build a forward-looking, innovation-friendly framework rather than extending legacy broadcast regulations onto a fundamentally different technology. ALTD platforms serve millions of Indian consumers today and will serve hundreds of millions more as broadband deepens. The framework must reflect that ambition. Our submission is structured around five core principles.

1. ALTD is a Distinct Distribution Mode — Treat It Differently

ALTD operates on two-way, internet protocol delivery — not one-way satellite or cable broadcast. Regulatory frameworks built for spectrum-scarce technologies cannot apply to an infinitely scalable digital medium. ALTD must be recognised as an independent distribution category with its own proportionate regulatory approach.

2. Registration, Not Licensing

Uplinking and downlinking licenses are instruments designed for satellite channels. For ALTD, a lighter mechanism suffices — mandatory channel registration at the MIB portal, with the platform taking full accountability for content compliance through active EPG monitoring. This achieves oversight without disproportionate burden.

3. No NTO or Tariff Imposition — Keep Pricing Open

Imposing Network Tariff Order structures or pay channel parity obligations on ALTD is inconsistent with how digital platforms are regulated globally. Pay channels available free on YouTube and other global platforms reflect broadcaster and market choices. ALTD pricing must remain platform-determined, as it is for OTT, without regulatory caps or mandatory tariff structures.

4. Consumer Choice Must Be Protected — Mixed Viewing Is the New Normal

Consumers today use DTH, OTT, and ALTD simultaneously as complements, not substitutes. ALTD's core value is delivering both linear and on-demand content within a single experience. Rigid parity rules or content restrictions would harm this flexibility and ultimately harm consumers. As broadband expands, ALTD will bring millions of new consumers into the formal content ecosystem — overregulation risks that growth.

5. Integrate Measurement, Not Monetisation

ALTD platforms should share viewership data with BARC for a holistic national measurement framework. However, how platforms monetise inventory must remain a commercial decision. ALTD's programmatic, impression-based advertising model is more evolved than traditional TV's fixed inventory approach. Regulatory intervention in monetisation methodology would regress innovation and should be avoided.

We request TRAI to consider a framework that is technology-neutral, consumer-centric, and proportionate — one that enables ALTD to grow as a legitimate and accountable distribution mode without the constraints of legacy broadcast regulation.

Summary of Recommendations

The following table provides a quick reference to our recommended positions on each of the 15 consultation questions:

Q. No.	Issue	Recommended Position (Summary)
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Q1	Definition of ALTD Services	Broad statutory definition covering all app-based linear TV distribution over internet, irrespective of device or business model
Q2	Primary Stakeholder	Application Provider designated as primary licensee with shared accountability for TV manufacturers and OS providers
Q3	Grant Conditions & Fees	Tiered authorisation with proportionate fees; Indian entity mandatory; foreign entities require Indian subsidiary
Q4	Common Operational Conditions	Renewal, equity caps, cross-holding restrictions, infrastructure sharing aligned with DTH/IPTV framework
Q5	Specific Conditions	Mandatory DD/Prasar Bharati carriage; channel capacity reservation for integrated entities; monitoring and compliance reporting
Q6	TV Manufacturer Certification	Mandatory self-certification that only MIB-authorized ALTD apps are pre-installed; annual audit
Q7	Channel Compliance Assurance	Only MIB-permitted channels allowed; real-time channel registry; penalties for non-compliance
Q8	Value-Added Services	VAS registered separately; distinct from linear channels; subject to IT Act and OTT framework
Q9	Broadcaster Authorisation	All channels on ALTD platforms must hold ground-based or satellite broadcasting authorisation
Q10	Pay Channel Price Parity	Pay channels prohibited on free ALTD platforms; bundled pricing to be disclosed transparently
Q11	Consumer Protection	Single-window grievance system; 48-hour resolution mandate; responsible party clearly identified
Q12	Audience Measurement	ALTD platforms to share aggregated viewership with BARC within 12 months of authorisation
Q13	Viewership Data Publication	Self-published data permitted but must adhere to measurement standards; no misleading metrics
Q14	Future Hybrid Models	Tariff, interconnection and QoS regulations to apply pro-rata to paid tiers when introduced
Q15	Other Issues	EPG standards, channel placement transparency, revenue sharing disclosure, interconnection agreements to be regulated

Detailed Responses to Consultation Questions

A. Definition and Scope of ALTD Services

Question 1: What should be the appropriate definition and scope of Application-based Linear Television Distribution (ALTD) Services in the Indian broadcasting context?

Our Recommended Definition

We recommend that ALTD Services be defined as follows in the Indian regulatory framework:

"Application-based Linear Television Distribution (ALTD) Service" means any service that aggregates and distributes pre-scheduled, linear television channels and/or programmes to consumers over the internet through a software application, website, or any other application-based delivery mechanism, irrespective of the device on which such service is received (including but not limited to connected television sets, mobile devices, laptops, tablets or any other internet-enabled device), and includes Free Ad-Supported Streaming Television (FAST) Services, whether offered free of charge or on a paid or hybrid basis.

Justification

- The definition should be broad and technology-neutral, capturing all forms of internet-based linear TV distribution regardless of the underlying technology, device, or business model.
- It should explicitly include both pre-installed applications on Smart TVs and downloadable applications, as well as web-based access, to prevent regulatory arbitrage based on technical delivery mechanisms.
- The term ALTD is appropriately wider than FAST because it captures both current free models and future paid or hybrid models, future-proofing the definition.
- The definition should NOT be limited to ad-supported services only, since paid ALTD tiers are likely to emerge and should not require an entirely new regulatory category.
- Value-added services (such as catch-up TV and on-demand content) offered alongside linear channels may be included within the scope of ALTD, but should be clearly distinguished from the linear component for regulatory treatment.
- The definition should exclude pure video-on-demand (VOD) platforms that do not offer any scheduled linear programming.

Recommendation: Adopt a broad, device-agnostic and business-model-neutral statutory definition of ALTD Services that encompasses all forms of internet-based linear TV distribution. Explicitly include FAST services within this definition.

B. Primary Stakeholder Responsibility

Question 2: Should the Application Provider be designated as the primary stakeholder responsible for obtaining authorisation for provisioning of ALTD Services?

Our Position

Yes. We strongly recommend that the Application Provider be designated as the primary entity responsible for obtaining authorisation for ALTD Services. However, this should be accompanied by shared accountability obligations on TV manufacturers and OS providers in a supporting role.

Rationale

- The Application Provider is the entity that exercises the most direct and meaningful control over the consumer experience — it determines which channels are available, curates the EPG, manages the user interface, controls ad insertion, and manages the commercial relationship with broadcasters/content providers.
- Designating the Application Provider as the primary licensee creates a clear, single point of regulatory accountability, which is essential for enforcement.
- This mirrors the approach taken for other DPOs — a DTH operator, for example, is the licensee, not the satellite or the set-top box manufacturer.
- TV manufacturers and OS providers should not be the primary licensees as they do not control the content or the distribution service — their role is closer to that of infrastructure providers.

Accountability for TV Manufacturers and OS Providers

While the Application Provider should be the primary licensee, TV manufacturers and OS providers should be subject to the following supporting obligations:

- They must not pre-install or list on their app stores any ALTD application that does not hold a valid MIB authorisation.
- They must remove or disable any ALTD application upon direction from MIB or TRAI.
- They must maintain a registry of ALTD applications pre-installed or available on their platforms and share it with TRAI periodically.
- They must cooperate with regulatory authorities in the event of content compliance investigations.

Foreign Entities

The consultation paper rightly highlights the issue of overseas entities (such as Xiaomi SG) controlling ALTD services delivered to Indian consumers. We strongly recommend:

- Any entity providing ALTD Services to Indian consumers must be incorporated in India as a company under the Companies Act 2013.
- The Indian entity must hold the MIB authorisation and be responsible for all content compliance, consumer grievance, and regulatory reporting obligations.
- Foreign entities may hold equity in the Indian licensee entity subject to FDI limits applicable to broadcasting distribution services.
- The authorisation must require the authorised Indian entity to have management control with a majority Indian board and a resident Indian Chief Executive.

Recommendation: Designate the Application Provider as the primary licensee for ALTD Services. Impose secondary accountability on TV manufacturers and OS providers to ensure only authorised ALTD apps are available on their platforms. Mandate that all ALTD service providers operating in India must be incorporated in India.

C. Authorisation — Terms, Conditions and Fees

Question 3: *What should be the terms and conditions including fees for grant of service authorisation to application providers provisioning ALTD Services?*

We recommend a tiered authorisation framework calibrated to the scale of the ALTD service provider, to ensure proportionality while maintaining regulatory oversight. The following conditions are recommended:

a. Service Area

- ALTD authorisation should be granted for an All-India service area, consistent with the internet-based, borderless nature of these services.
- Geo-restriction capabilities (ability to restrict content delivery based on geography within India) should be mandated where content rights are region-specific.

b. Validity Period

- Initial authorisation validity: 10 years, aligned with DTH licence periods.
- Renewal should be non-automatic and subject to compliance track record review.

c. Eligibility Conditions

- The applicant must be an Indian company incorporated under the Companies Act 2013.
- The company must have a minimum of 51% equity held by Indian citizens/Indian-incorporated entities.
- The applicant must not have been convicted of any offence under applicable broadcasting laws.
- The applicant must not be engaged in activities in conflict with national security.

d. Minimum Net Worth

- Given the internet-based nature of ALTD services (which do not require the same capital infrastructure as DTH or Cable), a lower net worth threshold is appropriate.
- Recommended minimum net worth: Rs. 1 crore for services covering up to 1 million users; Rs. 5 crore for services covering above 1 million users.
- A tiered net worth framework encourages new entrants while ensuring larger platforms can meet their obligations.

e. Processing Fee

- Rs. 10,000 (non-refundable), payable at the time of application submission.

f. Entry Fee

- Rs. 10 lakh (one-time), payable upon grant of authorisation.
- This is significantly lower than the entry fee for DTH services, reflecting the lower capital requirements of ALTD services.

g. Bank Guarantee

- A bank guarantee of Rs. 25 lakh should be maintained throughout the authorisation period.
- This may be invoked in cases of serious content compliance violations or consumer protection failures.

h. Authorisation Fee

- An annual authorisation fee of 1% of Adjusted Gross Revenue (AGR), defined as advertising revenue net of agency commissions and applicable taxes.
- For services in the first two years of operation, a reduced fee of 0.5% of AGR to support market development.

i. Security Deposit

- A security deposit of Rs. 10 lakh, refundable upon surrender of authorisation subject to compliance clearance.

j. Roll-Out Obligations

- No specific geographic roll-out obligations, given that ALTD services are accessible across India through the internet by definition.
- However, the authorised entity should be operationally live within 6 months of receiving authorisation.

k. Obligations for Foreign Entities

- As stated under Q2, all ALTD services must be provided through an Indian-incorporated entity.
- Foreign entities should not be permitted to directly hold ALTD authorisations.
- Indian subsidiaries of foreign companies should be subject to the same conditions as any other Indian applicant.
- Technical infrastructure for content delivery and the Electronic Programme Guide (EPG) management must be physically located within India to facilitate regulatory oversight and enforcement.

Recommendation: Tiered authorisation with lower fees than traditional DPOs. Minimum net worth of Rs. 1-5 crore depending on scale. Annual AGR-based fee of 1%. Indian incorporation mandatory. Technical infrastructure for EPG and ad insertion to be India-based.

Question 4: *What should be the common terms and conditions applicable for authorised entities provisioning ALTD Services?*

Renewal

- Renewal application to be submitted at least 180 days before expiry.
- Renewal for 10-year periods, conditional on satisfactory compliance record.
- Renewal fee: Rs. 5 lakh flat.

Equity Holding and Management Control

- Foreign Direct Investment (FDI) up to 49% permitted through the automatic route, consistent with FDI policy for cable TV/DTH services.
- FDI above 49% up to 74% permitted through the government approval route.
- Management control and majority board representation must remain with Indian citizens.

Cross-Holding Restrictions

- An entity holding more than 20% equity in an ALTD Service provider should not simultaneously hold more than 20% equity in a television broadcaster (to prevent vertical integration distorting content carriage decisions).

- Cross-holding between two or more ALTD service providers to be permitted subject to a combined market share cap of 40%, to prevent monopolisation.
- Cross-holding between ALTD providers and traditional DPOs (DTH/Cable) to be permitted, as these are complementary services, but subject to consolidated market share monitoring by TRAI.

Transfer of Authorisation

- Transfer of ALTD authorisation requires prior approval from MIB.
- Mergers and acquisitions involving ALTD licensees to be notified to TRAI for assessment of market concentration implications.

Infrastructure Sharing

- ALTD service providers should be permitted to share technical infrastructure (CDN, servers, encoding infrastructure) to reduce costs and promote efficiency.
- Infrastructure sharing arrangements should not be used to circumvent cross-holding restrictions.

Recommendation: FDI cap of 49% (automatic) and 74% (government approval). Cross-holding caps between ALTD providers and broadcasters. Merger notifications mandatory. Infrastructure sharing permitted.

Question 5: *What should be the specific terms and conditions for authorised entities provisioning ALTD Services?*

Vertically Integrated Entities

- Any ALTD service provider that is also a broadcaster, or affiliated with a broadcaster, must offer channel carriage on non-discriminatory terms to all broadcasters.
- A minimum of 20% of channel capacity must be reserved for channels from unaffiliated broadcasters.
- Carriage fees and placement decisions must be transparent and published.

Mandatory Carriage — Prasar Bharati and DD Channels

- ALTD service providers should be required to mandatorily carry all DD Free Dish channels and Doordarshan channels, free of charge, consistent with obligations on DTH and cable operators.
- This ensures public service broadcasting reaches the expanding ALTD consumer base.
- Mandatory carriage of crisis communication and emergency broadcast signals should also be required.

Sports Broadcasting Signal Sharing

- The mandatory sharing of sports broadcasting signals with Prasar Bharati (as required for DTH and HITS operators) should be equally applicable to ALTD service providers.
- This is essential for ensuring universal access to major sporting events of national interest.

Monitoring and Inspection

- TRAI and MIB must have the right to inspect ALTD service provider systems at any time with reasonable notice.

- ALTD service providers must maintain channel logs (recordings of all linear channels for a minimum of 90 days) to facilitate content compliance audits.
- Failure to maintain channel logs should attract penalties.

Information Supply

- ALTD service providers must submit quarterly reports to TRAI covering: subscriber/user base, revenue, channels carried, complaints received and resolved, and any content compliance incidents.
- Annual audited financial statements to be submitted within 90 days of the financial year end.

Recommendation: Mandatory DD/Prasar Bharati carriage. Sports signal sharing with Prasar Bharati. 90-day channel log retention. Quarterly regulatory reporting. Transparent carriage fee publication.

Question 6: *What certification mechanism should be prescribed for TV manufacturers and OS providers to ensure ALTD apps are duly authorised?*

- TV manufacturers and OS providers should be required to self-certify annually to MIB that all ALTD applications pre-installed on their devices or available through their app stores are holders of valid ALTD authorisations.
- MIB should maintain a publicly accessible register of all valid ALTD authorisations, updated in real-time, which TV manufacturers and OS providers can reference.
- TV manufacturers must remove any pre-installed ALTD application within 30 days of its authorisation being suspended or cancelled.
- OS providers must delist any ALTD application from their app stores within 7 days of receiving notification of authorisation cancellation from MIB.
- A dedicated compliance officer must be designated by each TV manufacturer and OS provider for liaising with MIB and TRAI on ALTD compliance matters.
- Failure to comply with these obligations should attract penalties on the TV manufacturer or OS provider, with graduated penalties for repeat non-compliance.

Recommendation: Annual self-certification by TV manufacturers and OS providers. MIB to maintain a real-time public register of authorised ALTD providers. Mandatory removal of unauthorised apps within 30 days.

Question 7: *What assurance mechanisms ensure ALTD providers carry only MIB-permitted channels? What penalties for non-compliance?*

Channel Compliance Assurance

- ALTD service providers must, before onboarding any channel, verify that the channel holds a valid MIB permission (uplinking/downlinking or ground-based broadcasting authorisation).
- MIB should maintain a publicly accessible, machine-readable (API-enabled) registry of all permitted channels in India, updated within 24 hours of any changes.
- ALTD service providers must reconcile their channel list against the MIB registry at least once every 30 days and remove any channel whose permission has lapsed or been cancelled.
- A channel onboarding attestation form, signed by both the ALTD provider and the channel, confirming regulatory compliance, should be mandatory.

Penalties for Non-Compliance

- Carrying one or more channels without MIB permission: Rs. 1 lakh per channel per day of non-compliance.
- Failure to remove a channel within 7 days of MIB directing its removal: Rs. 5 lakh per channel per day.
- Repeat violations within a 12-month period: Suspension of ALTD authorisation for 30 days.
- Three or more violations within a 12-month period: Cancellation of ALTD authorisation.
- The penalty mechanism should include an appeal process before TRAI before punitive action is implemented.

Recommendation: MIB to maintain a real-time, API-accessible channel registry. ALTD providers must reconcile channel lists monthly. Graduated penalties from Rs. 1 lakh/channel/day up to authorisation cancellation for repeat violations.

Question 8: *Should specific terms and conditions be prescribed for value-added services (VAS) offered by ALTD providers?*

- Yes, value-added services (such as catch-up TV, video-on-demand libraries, and interactive services) offered by ALTD providers should be subject to specific conditions, distinct from those governing linear channels.
- VAS offerings must be clearly labelled and presented distinctly from linear channel content within the user interface, so consumers can distinguish between live/scheduled content and on-demand content.
- VAS involving video-on-demand content should comply with the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, as applicable to OTT platforms.
- ALTD service providers must not use VAS offerings to circumvent programme or advertising code obligations applicable to linear channels (e.g., by presenting live content as on-demand to avoid compliance).
- Advertising in VAS content should comply with the Advertising Standards Council of India (ASCI) guidelines and the Consumer Protection (Guidelines for Prevention of Misleading Advertisements) Rules, 2022.
- Data collected from VAS usage must comply with applicable data protection and privacy laws.

Recommendation: VAS to be regulated separately from linear channels. Compliance with IT Rules 2021 for on-demand content. Clear UI labelling distinguishing linear from on-demand content. Advertising code compliance mandatory.

D. Channel Authorisation for Broadcasters on ALTD Platforms

Question 9: *Should broadcasters providing channels on ALTD platforms be mandated to obtain satellite or ground-based broadcasting authorisation?*

Our Position

Yes, we strongly recommend that any broadcaster or content provider intending to provide television channels on ALTD platforms in India must hold either a satellite broadcasting authorisation or a ground-based broadcasting authorisation from MIB, before entering into any commercial arrangement with an ALTD service provider.

Justification

- This is consistent with the fundamental principle enshrined in Indian broadcasting regulation since 2011 — that no television channel can be publicly distributed in India without MIB permission.
- The medium of delivery (internet vs. satellite) should not determine whether a channel needs regulatory permission. A channel delivering scheduled content to millions of Indian viewers is performing the same function regardless of how the signal travels.
- The ground-based broadcasting authorisation framework recommended in TRAI's GBB Recommendations (15 January 2025) is specifically designed to accommodate internet-delivered broadcasting, making it the most appropriate authorisation type for channels on ALTD platforms.
- This approach aligns with international practice — Italy's AGCOM requires every FAST channel to obtain individual authorisation for each programming schedule.
- ALTD service providers should be prohibited from entering into commercial arrangements with channels that do not hold valid broadcasting authorisations.

Applicability to Foreign Channels

- Foreign channels currently available on ALTD platforms without MIB downlinking permission are in direct violation of existing guidelines.
- A clear transition period of 6 months should be specified after the authorisation framework is notified, within which all channels must obtain the required authorisation or be removed from ALTD platforms.
- ALTD service providers should be held jointly responsible for carrying channels that do not obtain authorisation after the transition period.

Recommendation: All channels on ALTD platforms must hold MIB ground-based or satellite broadcasting authorisation. 6-month transition period after notification. ALTD providers jointly liable for carrying unauthorised channels post-transition.

E. Pay Channels on ALTD Platforms

Question 10: *What pricing methodology should be adopted for price parity of television channels across ALTD platforms?*

The Core Issue

Pay channels (such as CNBC TV18, India Today, Zee News, NDTV Profit) are currently being offered free of charge on FAST/ALTD platforms like Samsung TV Plus, Yupp TV, and LG WebOS, while the same channels are monetised as pay channels on DTH and Cable platforms. This directly violates TRAI's Tariff Order 2017, which mandates that a channel classified as a 'Pay Channel' must not be offered for free on any distribution platform.

Recommended Approach

- The Tariff Order 2017 and its amendments should be explicitly extended to apply to ALTD service providers. ALTD platforms should be brought within the definition of 'distribution platforms' for the purposes of the Tariff Order.
- Pay channels must not be available free of charge on ALTD platforms. Broadcasters and ALTD service providers who make pay channels available without charge should both be subject to penalties.
- Where channels are bundled within a subscription package on an ALTD platform, the platform must transparently disclose the effective per-channel price for each pay channel included in the bundle.
- Where an ALTD platform absorbs the cost of a pay channel as part of its business model (subsidising the viewer), this must be disclosed to TRAI as part of its quarterly reporting, and the channel must not be classified as FTA on any other platform.
- The broadcaster should be responsible for ensuring they do not enter into agreements that allow their pay channels to be distributed for free on ALTD platforms.

Transition Mechanism

- A 6-month transition period should be provided for ALTD platforms and broadcasters to restructure existing commercial arrangements that currently allow pay channels to be carried for free.
- After the transition period, penalties for violation should be Rs. 5 lakh per channel per day.

Recommendation: Extend Tariff Order 2017 to ALTD platforms. Pay channels prohibited on free ALTD tiers. Bundled pricing must be transparently disclosed. 6-month transition for restructuring existing arrangements. Penalties of Rs. 5 lakh/channel/day post-transition.

F. Consumer Protection

Question 11: *What consumer protection and grievance redressal obligations should be specified for ALTD service providers?*

The Consumer Protection Gap

Currently, a consumer watching a FAST channel on their Smart TV has no clear path for grievance redressal. They do not know whether to approach the TV brand, the app provider, the channel, or a regulatory authority. This opacity is unacceptable when India has over 100 million ALTD users.

Recommended Obligations

- Every authorised ALTD service provider must designate a Grievance Redressal Officer (GRO), whose name and contact details must be prominently displayed within the ALTD application or website.
- Consumers must be able to register complaints via at least two channels: email and a dedicated in-app/on-platform complaint mechanism.
- All complaints must be acknowledged within 24 hours and resolved within 7 working days.
- Complaints relating to content (inappropriate, offensive, or non-compliant content) must be escalated to MIB if unresolved within 7 days.
- The ALTD service provider must publish a quarterly report on the TRAI/MIB portal showing the number of complaints received, resolved, and pending by category.
- A single-window escalation mechanism should be established by TRAI, where consumers can escalate unresolved ALTD complaints, similar to the Centralised Online Grievance Redressal Portal for telecom services.

Quality of Service

- TRAI should specify minimum quality of service (QoS) parameters for ALTD services, including minimum streaming quality, maximum interruption frequency, and EPG accuracy standards.
- ALTD providers should publish their QoS performance data quarterly.

Recommendation: Mandatory Grievance Redressal Officer with visible contact details. 24-hour complaint acknowledgment, 7-day resolution. Quarterly public complaint reports. TRAI single-window escalation portal for ALTD complaints. Minimum QoS standards to be specified.

G. Audience Measurement

Question 12: *What is the right methodology for integrating ALTD service data into the television ratings framework, and what are the proposed timelines?*

- We welcome MIB's TV Ratings Policy 2026, which now includes connected TV and ALTD platforms within the audience measurement framework.
- ALTD service providers should be required, as a condition of their authorisation, to share anonymised, aggregated viewership data with the registered television rating agency (currently BARC India).

- The data shared should include: channel-wise viewership (daily unique viewers, average watch time per channel, total viewing hours), device type breakdown, and time-slot wise viewership patterns.
- Personally identifiable information (PII) must never be shared with rating agencies. All data must be anonymised before submission.
- Data sharing should begin within 12 months of authorisation being granted.
- BARC should develop standardised APIs and data formats that ALTD providers can use to submit viewership data, ensuring consistency and comparability.
- A universal TV Viewership Index should be created that aggregates linear TV viewership across cable, DTH, and ALTD platforms, enabling a holistic picture of content consumption in India.

Question 13: *How should self-published viewership data by ALTD platforms be aligned with the proposed authorisation framework?*

- The TV Ratings Policy 2026 permits TV distribution platforms to publish viewership data on their websites without prior registration. This should be permitted for ALTD platforms as well.
- However, self-published viewership data must adhere to minimum methodological standards specified by MIB/TRAI to prevent misleading or inflated viewership claims that could distort the advertising market.
- Self-published data must be clearly labelled as platform-reported and distinguished from BARC-measured ratings.
- Platforms must not misrepresent self-reported metrics in advertising or commercial negotiations with broadcasters.

Recommendation: Mandatory anonymised viewership data sharing with BARC within 12 months. Standardised data submission APIs. Self-published data permitted but subject to minimum methodological standards and labelling requirements.

H. Future Considerations — Hybrid Business Models

Question 14: *How should ALTD services that adopt hybrid free/paid business models be regulated, particularly with respect to tariff, interconnection, and QoS?*

Anticipated Evolution

ALTD services currently operate on a free, ad-supported model. However, as these platforms mature, hybrid models are likely to emerge — where some channels or features are free while others require subscription. This evolution is already visible in global markets with tiered OTT and FAST platforms.

Regulatory Approach for Paid Tiers

- When an ALTD service provider introduces a paid tier or a paid channel, the tariff regulations applicable to DPOs (including channel pricing norms and bouquet regulations) should apply to that paid component, proportionately.
- Consumers must be clearly informed when a channel transitions from free to paid, with at least 30 days' advance notice.
- The pricing of paid channels on ALTD platforms must comply with TRAI's Tariff Order, ensuring price parity with other distribution platforms for the same channel.
- Once a paid tier is introduced, ALTD providers must also comply with TRAI's interconnection regulations for the paid component of their service.

Quality of Service for Paid Services

- QoS standards for paid ALTD tiers should be at least equivalent to those applicable to DTH and IPTV services for the same tier of service.
- Service Level Agreements (SLAs) with consumers for paid services must be published and enforceable.

Transition Monitoring

- ALTD service providers intending to introduce paid services must notify TRAI at least 90 days in advance, allowing TRAI to assess the applicability of additional regulatory obligations.
- TRAI should conduct a review of the ALTD regulatory framework every 3 years to assess whether the evolution of business models requires regulatory adjustments.

Recommendation: Tariff Order to apply proportionately to paid ALTD tiers. 30-day consumer notice before any free-to-paid transition. TRAI notification 90 days before paid tier launch. 3-year periodic framework review by TRAI.

I. Other Regulatory Issues

Question 15: *Are there other issues — channel positioning, EPGs, revenue sharing, interconnection agreements — relevant for the regulatory framework?*

a. Channel Positioning on Home Screen / EPG

- Channel placement on ALTD platforms significantly influences viewership. Currently, placement decisions are entirely at the discretion of the platform, often influenced by commercial arrangements.
- TRAI should prescribe that carriage and placement decisions must be transparent and non-discriminatory. Platforms must publish their carriage and placement policies.
- DD channels and mandatory carriage channels should be given prominent placement, as is required on DTH platforms.
- Paid placement arrangements (where broadcasters pay for prominent placement) must be disclosed to consumers and to TRAI.

b. Electronic Programme Guide (EPG) Standards

- ALTD service providers should adhere to minimum EPG accuracy standards — programme titles, timings, and descriptions must be accurate and updated at least 24 hours in advance.
- EPG data for mandatory carriage channels (DD, Prasar Bharati) must be maintained to the same standards as voluntary channels.
- EPG data must be available in regional languages alongside English for channels broadcasting in regional languages.

c. Revenue Sharing and Commercial Arrangements

- Commercial arrangements between ALTD providers and broadcasters (including revenue sharing, ad inventory split, and carriage fees) should be registered with TRAI to ensure transparency and to facilitate the resolution of commercial disputes.
- ALTD providers must not engage in predatory pricing with broadcasters (e.g., demanding carriage fees that are unreasonably high) that could result in channels being unable to appear on ALTD platforms.
- TRAI should have the power to adjudicate disputes between ALTD providers and broadcasters regarding commercial terms.

d. Interconnection Agreements

- TRAI should specify a standard Reference Interconnect Offer (RIO) framework for ALTD services, specifying the minimum terms on which ALTD providers must offer carriage to broadcasters.
- Interconnection agreements between ALTD providers and broadcasters should be filed with TRAI within 30 days of execution.

e. Data Privacy and Consumer Data

- ALTD service providers must comply with the Digital Personal Data Protection Act, 2023 (DPDPA) in respect of all consumer data collected through their platforms.
- Consent for data collection must be explicitly obtained from consumers, in plain language, before any data is collected beyond what is technically necessary for service delivery.
- ALTD providers must publish a clear, accessible Privacy Policy detailing what data is collected, how it is used, with whom it is shared, and how long it is retained.

f. Cybersecurity

- ALTD service providers handling consumer data should comply with CERT-In's cybersecurity guidelines and incident reporting obligations.
- Any data breach must be reported to CERT-In within 6 hours and to affected consumers within 72 hours, consistent with existing obligations.

g. International Best Practices

- Italy (AGCOM) — Individual authorisation per FAST channel programming schedule. India could adopt a similar channel-level authorisation requirement for channels on ALTD platforms.
- United Kingdom (Ofcom) — Ongoing review of FAST services as part of the 'Future of TV Distribution' consultation. India should monitor Ofcom's recommendations for potential adaptation.
- Canada (CRTC) — Inclusion of FAST channels in audience measurement framework. India's proposed integration of ALTD data into BARC's framework is aligned with this approach.
- Australia (ACMA) — Clear definitional framework for FAST services distinguishing them from VOD services. India should ensure a similar definitional clarity in the ALTD framework.

Recommendation: Transparent and non-discriminatory channel placement policies. EPG accuracy standards and regional language requirements. Carriage and revenue-sharing agreements to be filed with TRAI. Standard Reference Interconnect Offer framework. DPDPA compliance for consumer data. CERT-In cybersecurity reporting obligations.

Conclusion

The rapid growth of ALTD/FAST services in India is a positive development that brings free, high-quality linear television content to tens of millions of additional viewers — particularly in smaller towns and rural areas where Connected TV adoption is accelerating. However, this growth must be accompanied by a regulatory framework that ensures content accountability, consumer protection, and a level playing field for all participants in the broadcasting ecosystem.

We believe the framework proposed in our comments strikes the right balance — it creates clear regulatory accountability without imposing disproportionate burdens on new entrants, it protects consumers, and it ensures that the benefits of ALTD services do not come at the cost of fair competition with licensed DPOs.

We urge TRAI to act swiftly on this matter, given the pace of ALTD adoption and the continuing harm being caused by the current regulatory vacuum. A phased implementation approach — with authorisation requirements taking effect first, followed by tariff and content compliance obligations — would allow the industry adequate time to transition while providing immediate regulatory certainty.

We remain available to provide any further information or clarification that may assist TRAI in formulating a comprehensive and forward-looking regulatory framework for ALTD Services in India.

Yours faithfully,

[Authorised Signatory Name]

[Designation]

[Organisation Name]

[Date]