

Fwd: Comments on the Consultation paper on "Formulation of a Regulatory Framework for ALTD Services Including FAST Services.

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2 emails

Deepali Sharma <advbcs-2@traf.gov.in >

Mon, 27 Apr 2026 5:39:32 PM +0530

To "Shivani Sharma"<jtadvisor-bcs@traf.gov.in>

==== Forwarded message =====

From: NCHSEBPL <nchsebpl@gmail.com>

To: <advbcs-2@traf.gov.in>, <jtadvisor-bcs@traf.gov.in>

Date: Mon, 27 Apr 2026 13:18:24 +0530

Subject: Comments on the Consultation paper on "Formulation of a Regulatory Framework for ALTD Services Including FAST Services.

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To,
Dr. Deepali Sharma,
Advisor (B&CS), TRAI

The comments on the consultation paper on the subject from NCHSE, Bhopal (CAG) are given below for consideration

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.

Ans.1 ALTD/FAST services are largely free and ad, supported services that offers different programmes on demand over internet using a Application platform which can be ad, supported Linear T,V, channels and OTT platforms,

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

- a. If yes, please provide detailed justification and supporting reasons.
- b. If not, please identify the appropriate stakeholder(s) who should be responsible for obtaining such authorisation, along with rationale.

Ans.2 Yes; Application Provider be designated as the primary stakeholder responsible for obtaining authorization for the provisioning of ALTD services , It is true that the ALTD services involves multiple entities even though the Application Provider is responsible for all these entities in ALTD Services, If not it will be very difficult to held responsible various enties of ALTD services..

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?

Ans.3 We can only say that common terms and conditions that are apply for Broadcasting (T.V. channels, Broadcasting Television distribution and Radio broadcasting) services may be considered for ALTD Services in India under the 'Television Channel Distribution Services' (Table 2,2)

If the foreign entities providing 'ALTD Services' in India, an Indian company registered under the Indian Company Act must be the guarantor,

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

Ans.4 We may not comment item wise but suggest that ALTD services should also be come under 'Television Channel Distribution Services' and all regulations; instructions should be applied to ALTD services asd in the case of traditional distributional platform,

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.

Ans.5 No comments, but we would like to mention that it should be mandatory for 'ALTD SERVICES' TO BROADCAST SPORTING SIGNALS and the compulsory transmission of certain channels as mandated for DTH, HITS and IPTV services.

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.

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.

Ans.6&7 An affidavit type of declaration should be provided/declaration for television manufacture and operating system providers to ensure that ALTD services are duly authorised by MIB. If, there is any violation a penalty/fine may be imposed or services may be terminated.

Question 6 and 7 are inter linked and therefore, should be treated together.

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.

Ans.8 Yes, There is need to prescribe specific terms and conditions for value added services offered by ALTD services providers. In this connection, time slot, periodicity, regular/ad hoc etc., should be taken into consideration while framing the terms and conditions.

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.

Ans.9 There is full justification with authorised entities provisionary ALTD services to consumers to enter an agreement whether it is Satellite based Broadcasting or Ground based Broadcasting . The specific reasons with justification should be mentioned . It may possible that it differ geographical and area wise. But an agreement should be mandate.

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.

Ans.10 It is true that any price channel should not be available as free on ALTD platform of any other platform. Keeping this under consideration it is suggested that pricing methodology should be similar to all such platforms whether it is traditional distribution platform or ALTD platform or any other such platform which offers programmes on T.V., internet, smartphone etc.,. If we do not follow similar pricing methodology it may happen that viewers will shift to such platform which is offering pay channels at cheaper rate so similar pricing policy for all suggested.

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

Ans.11 If we see the instructions of MIB issued from time to time with regard to consumer protection and grievance redressal mechanism, we have not a good experience, whether it is MSO or LCO. They does not listen to CAGs so we can not say whether the instructions are being followed in true spirit or not. But it is clear that consumer protection and grievance redressal mechanism should be applied strictly by all such platforms which broadcast programmes to viewers through different methods and they must apply with similarity whether it is traditional distribution platform or ALTD platform.

Q12. 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.

Ans. 12 An outsider which do such type of work/survey should be registered with MIB and such agency may be asked for audience measurement work on quarterly basis by the service providers on different platforms. It is just like audit by TSPs. in telecom sector. This system should be adhered by traditional distribution platform, ALTD platform or other such platforms.

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.

Ans. 13 Keeping in view the comments against question 12, the further action can be taken and for that we offer the following points for consideration:-

- A. Standard guidelines should be framed by MIB.**
- B. Set of questionnaire for all to ascertain the ranking,**
- C. Periodicity quarterly.**
- D. Will be easy to judge the rating of a particular programme at different platforms**
- E. Quarterly report must be given to MIB.**

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.

Ans.14 If the application provider provide ALTD services adopt a hybrid business model, they should be taken into regulatory frame work and regulated alike to traditional distribution platforms. All instructions, guidance etc., should be adopted by the ALTD

service providers.

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.

Ans.15 In net shell we are of the opinion that ALTD services including OTT services should be brought under regulatory framework and the terms and conditions of the regulatory framework which are applicable to traditional distribution platform should also be applicable to ALTD services.

We would like to say that ALTD Services and other similar services which are not yet covered under any regulatory framework should be come under *The Cable Television Networks (Regulation) Act.,1995 so that similarity can be maintained in registration and operation.

Regards.

R.Chandra

Sr. Fellow & CAG member



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