

Comments on Consultation Paper on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services)

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Question No.1: What should be the appropriate definition and scope of Application-based Linear Television Distribution Services, i.e., 'ALTD Services' in the Indian broadcasting context, taking into account terminologies available internationally? Stakeholders are requested to provide their comments with detailed justification.

Answer 1: Application-based Linear Television Distribution Services, i.e., 'ALTD Services' can be defined as under:

Application-based Linear TV Distribution Services (ALTD Services) refer to distribution services that distribute linear television channels through internet-based applications or digital platforms, enabling consumers to access live TV channels on devices such as smartphones, smart TVs, tablets, and computers, instead of through conventional cable, DTH, or satellite distribution networks.

Question No.2: The 'ALTD Services' ecosystem involves multiple entities, including application providers, television equipment manufacturers, operating system providers, broadcasters, content providers, content aggregators and other technology or solution providers. However, the application provider appears to play a central role in the distribution of linear television channels across various business models. In this context, should the Application Provider be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of 'ALTD Services'?

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

Answer 2:

Yes, Application Provider can be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of 'ALTD Services' as its role is similar to that of a Distribution Platform Operator in the Linear TV Ecosystem.

The application provider constitutes a central stakeholder in the Application-based Linear TV Distribution (ALTD) ecosystem, as it serves as the primary interface between consumers, content providers, and the underlying distribution infrastructure. The role performed by the application provider is integral to the delivery, accessibility, management, and monetisation of linear television services distributed over the internet.

In this regard, the following justifications may be considered:

A. Consumer-facing interface: The Application Provider is typically the primary point through which consumers access linear television channels, manage subscriptions, make payments, and avail customer support services. Consequently, the overall

consumer experience is substantially dependent upon the functioning of the application platform.

B. Control over presentation and discoverability of content: Application Providers exercise significant control over the manner in which channels and bouquets are displayed, organised, recommended, and made discoverable to consumers.

C. Aggregation and distribution functions: Many Application Providers aggregate channels and services from multiple broadcasters or distributors onto a single digital platform. In effect, they perform functions akin to the distribution platform operators.

D. Collection and processing of consumer data: Application providers may engage in collection, storage, and processing of consumer viewing data and usage analytics. Such data may influence targeted advertising, content recommendations, subscription offerings, and competitive market behaviour.

E. Technical responsibility for service delivery: The Application Provider manages the technological infrastructure necessary for the delivery of live television services across internet-enabled devices, including user authentication, interoperability, and platform functionality.

F. Relevance from a regulatory and consumer protection perspective: Given their direct relationship with consumers, Application Providers are well-positioned to address issues relating to transparency, billing practices, accessibility, grievance redressal, and compliance with applicable regulatory obligations.

Question No.3: What should be the terms and conditions including fees or charges for the grant of service authorisation to the application providers provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Annexure-II of 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments 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?

Answer No.3: The terms and conditions including fees or charges for the grant of service authorisation applicable on the application providers provisioning 'ALTD Services' in India should be in accordance with the recommendations made in Annexure-II of 'Authorisation Recommendations dated 21st February 2025'. It is reiterated that the ALTD Services are Distribution Services and must be treated at par with other distributors in the entire ecosystem.

- a. Service Area: India

b. Validity Period: 10 years

c. Eligibility Conditions: Indian Company/LLP/Joint Venture along with other conditions prescribed in Annexure-II of 'Authorisation Recommendations dated 21st February 2025.

d. Minimum Net worth: Rs. 10 crore

e. Processing Fee: Rs. 10,000

f. Entry Fee: Rs. 10 crore

g. Bank Guarantee: 5 crore or 20% of the Authorisation Fee for two quarters and other dues not otherwise securitized, whichever is higher

h. Authorisation Fee : 3% of AGR

i. Security Deposit: 1 crore

j. Roll Out Obligations: 6 months

Question No.4: What should be the common terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part-I of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:

a. Renewal of Authorisation

b. Renewal Fee

c. Equity Holding and Management Control

d. Restriction on cross-holding of equity shares/capital contribution between

i. TV broadcasters and application providers provisioning ALTD services

ii. Application Providers provisioning ALTD services and other DSPs

e. Transfer/Surrender of Service Authorisation

f. Sharing of Infrastructure

g. Any other terms and conditions

Answer 4:

The common terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India should be in accordance with the recommendations made in Part-I of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'. It is reiterated that the ALTD Services are Distribution Services and must be treated at par with other distributors in the entire ecosystem.

a. Renewal period: 10 years

b. Renewal Fee: Rs. 10,000/-

c. Equity Holding and Management Control:

i) Restriction on cross-holding of equity shares/capital contribution TV between broadcasters and application providers provisioning ALTD services: Restrictions on cross-holding pattern as prescribed for the DTH service and HITS service should be prescribed for and made applicable to ALTD Services.

ii) Application Providers provisioning ALTD services and other DSPs: No cross-holding requirements should be prescribed for between ALTD Services and other DSPs.

e. Transfer/Surrender of Service Authorisation: Notice of 60 days

f. Sharing of Infrastructure: Sharing to be allowed only in cases where Application Provider is same.

g. Any other terms and conditions: As applicable to other Distribution Platform Operators.

Question No.5: 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. 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

Answer 5: The specific terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India should be in accordance with the recommendations made in Part-II of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'. It is reiterated that the ALTD Services are Distribution Services and must be treated at par with other distributors in the entire ecosystem.

- a. Reservation of operational channel capacity by Vertically Integrated Entity: Not more than 15% of the operational channel capacity shall be reserved for the vertically integrated broadcaster(s) of the entities provisioning ALTD Services
- b. Services (PS) offered by application providers provisioning ALTD services: Not more than 5% of the operational channel capacity shall be reserved for the Platform Services (PS) of the entities provisioning ALTD Services.
- c. Monitoring and Inspection of facilities: ALTD Service Provider shall provide necessary facility for continuous monitoring of the ALTD network at its own cost. The ALTD Service Provider shall ensure preservation and retention of all content including, Platform Service, programmes and advertisements made available to their subscribers for a period of 90 days; ensure its security and that it is not tampered with during such period. Central Government or its authorised representative may inspect the ALTD service facilities. Such inspection shall ordinarily be carried out after reasonable notice except in circumstances, where giving such a notice will defeat the very purpose of the inspection and in such cases, it may be carried out without prior intimation.
- d. Supply of Information to Central Government/TRAI
 - i) The ALTD Service Provider shall provide information with respect to its service, equipment, network, systems, technical parameters, and any other relevant details as required by the Central Government/TRAI or their authorised representative from time to time in the specified format.
 - ii) The ALTD Service Provider shall provide any information required by the Central Government or its authorised representative regarding Programme Content and Quality, in the specified format.
- e. Consequences for Contravention of terms and conditions of authorisation should be prescribed by TRAI.

f. sharing of signals with Prasar Bharati should not be made a mandatory requirement.

Question No.6: What type of assurance or certification mechanism should be prescribed for television manufacturers and operating system providers to ensure that applications provisioning ALTD services, (whether pre-integrated with television sets or made available for download through application stores or web platforms) are duly authorised by MIB.

Answer 6: The following assurance/certification mechanism may be prescribed:

- A. Only registered ALTD Platforms should be allowed to get integrated with television sets and mobile phones.
- B. MIB should maintain and update the record of the registered ALTD Platforms.
- C. Television manufacturers, operating system providers, and application stores should be required to check and verify the licence of the ALTD Platform before hosting, pre-installing, or enabling access to such applications.
- D. Television manufacturers and operating system providers should undertake reasonable due diligence to ensure that applications made available on their devices or app ecosystems are listed in the authorised registry maintained by MIB.
- E. Operating system providers and application marketplace operators should establish internal compliance mechanisms requiring verification of MIB authorisation prior to onboarding or continuing distribution of ALTD applications.
- F. Television manufacturers and operating system providers should be required to submit periodic compliance declarations confirming that they have implemented appropriate verification and monitoring mechanisms in relation to ALTD applications hosted or distributed through their platforms.
- G. In case of violation, a clear takedown mechanism ought to be prescribed whereby MIB may direct the removal, disabling, or suspension of unauthorised ALTD applications from television interfaces, operating systems, or application stores within a specified timeline.

Such an approach would help balance regulatory oversight, consumer protection, and ease of doing business, while ensuring that unauthorised television distribution services are not proliferated through connected television ecosystems.

Question No.7: What kind of assurance mechanisms should be instituted to ensure that the application providers authorised for provisioning ALTD services carry only those channels which are authorised/permited by MIB for distribution in India. What kind of penalty/disincentive/deterrent be instituted for non-compliance? Provide your comments with justification.

Answer 7:

- A. Only licensed television channels should be permitted to be transmitted or streamed within India through ALTD platforms, ensuring that all content distribution remains within the approved regulatory framework.
- B. To support transparency, channels should be required to provide copies of their valid licences to ALTD platforms. Accordingly, only those channels that are duly authorised for transmission or streaming should be allowed to be carried on such platforms.

C. Further, all application providers should be directed to obtain the necessary permission from the Ministry of Information & Broadcasting for streaming licensed channels on their platforms.

All application providers should maintain and prominently display an updated list of MIB-licensed channels that are permitted to be streamed or distributed through their services, thereby ensuring clarity, accountability, and compliance across the ecosystem.

Question No.8: Whether there is a need to prescribe any specific terms and conditions for value-added services offered by ALTD service providers? If yes, what should be the terms and conditions? Stakeholders are requested to provide their detailed comments with justification.

Answer 8: Appropriate safeguards must be put in place to ensure that Value-Added Services of ALTD Platforms are not misused as platforms for carrying out illegal activities such as gambling, money laundering etc.

Question No.9: Whether the broadcasters/content owners providing or intending to provide television channels on ALTD platforms operating in India be mandated to obtain authorisation either for:

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

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

Answer 9: Yes, 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. Obtaining authorization is important because:

A. It will ensure that their activities are carried out within a clear legal and policy framework.

B. It will allow the Regulator to confirm that the ALTD Platform meets minimum eligibility conditions, follows prescribed standards, and operates in a manner consistent with the legal and regulatory framework

C. It will help maintain order in the sector by preventing unregulated or unauthorized entities from entering the market, thereby preventing unfair competition or consumer harm.

D. It will also enable consistent enforcement of rules, since only approved entities are subject to defined obligations such as reporting, quality standards, pricing norms, or content safeguards

E. It will improve accountability as Regulator will have a formal basis to monitor compliance and take corrective action if required.

It will promote transparency in the ecosystem by clearly identifying who is permitted to operate and under what conditions.

Question No. 10: In view of the availability of the pay television channels on ALTD platforms, what pricing methodology should be adopted for price parity of television channels across these platforms? Please provide detailed justification for your response.

Answer 10:

A. The Maximum Retail Price (MRP) for pay television channels should remain the same across all distribution platforms, including ALTD platforms, regardless of how the

content is delivered. This consistency is important to ensure fairness and to avoid any pricing distortions or regulatory loopholes between platforms.

B. To promote transparency and fair dealing, it should be mandatory for broadcasters and ALTD platforms to enter into Reference Interconnection Offers (RIOs).

C. At the same time, both traditional distributors and ALTD platforms should be allowed the flexibility to create and offer their own channel packages, including bouquets, so that competition is driven by better service quality, user experience, and innovation rather than differences in pricing structures.

D. Pay television channels that are offered as linear satellite services should not be made available free of charge through any digital or internet-based platform, where they are otherwise defined as pay channels.

Broadcasters should not provide channel signals to any ALTD platform without a proper written interconnection agreement in place, and similarly, ALTD platforms should not distribute such channels without entering into a valid agreement with the broadcaster. All such arrangements should be clearly documented and be in line with the prescribed regulatory requirements.

Question No.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.

Answer 11: ALTD Services are Distribution Services and must be treated at par with other distributors in the entire ecosystem. Regulations applicable on ALTD Services must be at par with those applicable on the Distribution Platform Operators i.e. Telecommunication (Broadcasting and Cable) Services Standards of Quality of Service and Consumer Protection (Addressable Systems) Regulations, 2017.

Question No.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.

Answer 12:

A. The expansion of audience measurement to include multiple viewing platforms, is a welcome move and leads to a more comprehensive and inclusive ratings framework. However, audience measurement should apply only to those platforms and channels that have obtained the necessary licences from the Ministry of Information & Broadcasting and are officially permitted to operate in India. As ALTD Services are accessible across multiple devices and viewership can be tracked at the individual device level, the measurement framework should ideally be designed to capture the complete user base instead of depending on sample-based projections.

B. In addition, it is recommended that a two-year implementation timeline be considered. This would provide adequate time to complete the regulatory process, including obtaining the necessary licences from the Ministry of Information & Broadcasting and securing all other required approvals and clearances, which in themselves are likely to extend beyond a year.

Question No.13: Under the revised guidelines, television distribution platforms and/or OTT platforms may publish periodic viewership data of broadcasters/channels they carry on their platforms and/or on their websites, without prior registration. In this context, stakeholders are invited to provide their comments on how such an enablement can be aligned with the proposed authorisation framework for application providers provisioning ALTD services, along with any related considerations.

Answer 13: While the platforms have been allowed to publish periodic viewership data of broadcasters/channels they carry on their platforms, it is necessary that only those ALTD platforms are allowed to release data that have been authorized by the Government of India. If any ALTD Platform does not have authorization, then it should not be allowed to publish any data.

Question No.14: Considering the scenario wherein application providers provisioning ALTD services may adopt a hybrid business model offering free and/or paid services, stakeholder comments are invited on how such services should be subject to the regulatory framework, particularly with respect to tariff, interconnection and quality of service aspects. Please provide your comments with justification.

Answer 14: ALTD Services are Distribution Services and must be treated at par with other distributors in the entire ecosystem. Even if the ALTD Services adopt hybrid business models in future, the regulations applicable on ALTD Services must be at par with those applicable on the Distribution Platform Operators, with appropriate necessary modifications.

Question No.15: 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.

Answer 15: ALTD Services are Distribution Services and must be treated at par with other distributors in the entire ecosystem. Regulations applicable on ALTD Services must be at par with those applicable on the Distribution Platform Operators.