

Response to Consultation Paper on Regulatory Framework for Application-based Linear Television Distribution Services (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services

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These comments are submitted in response to the Consultation Paper issued by the Telecom Regulatory Authority of India (TRAI) on Application-based Linear Television Distribution (ALTD) Services. The submissions address each of the fifteen questions raised in the Consultation Paper and are grounded in the principle that ALTD services, which distribute scheduled linear television channels to consumers over public internet networks, are functionally equivalent to licensed Distribution Platform Operators (DPOs) and must accordingly be regulated on comparable terms.

The overarching position is that regulatory parity, technology neutrality, consumer protection, and ease of doing business must form the foundational pillars of any framework governing ALTD services in India. The comments below reflect a considered view based on the existing broadcasting regulatory architecture, including the Broadcasting (Grant of Service Authorisations) Rules and the Authorisation Recommendations dated 21st February 2025.

Q1. Definition and Scope of Application-based Linear Television Distribution Services

Response

The definition of Application-based Linear Television Distribution (ALTD) Services must be anchored in the functional characteristics of the service rather than its technological delivery mechanism. The following key elements are central to any serviceable definition:

- Linear content: Scheduled, time-bound channels (not purely on-demand)
- Application-based delivery: Via apps on smart TVs, mobile devices, and web browsers
- Public internet transport: Delivery over public internet networks, without a dedicated managed network
- Functional equivalence: The service performs the role of a Distribution Platform Operator (DPO) substitute
- Platform responsibility: The app provider acts as the distributor and/or aggregator of television channels

Taking these elements into account, the following definition is recommended:

"Services that distribute scheduled, linear television channels/programming to end-users over public internet networks through application-based platforms (including pre-installed, downloadable or web-based applications), where such services perform a role functionally equivalent to licensed television distribution platforms such as cable TV, DTH or IPTV."

Such a definition ensures technology neutrality, captures the full range of ALTD service models currently in existence, and is consistent with the definitions and terminologies adopted in comparable international regulatory frameworks.

Q2. Primary Stakeholder Responsible for Obtaining Authorisation for ALTD Services

Response

This question involves a fundamental determination of the appropriate regulatory responsibility nexus in a multi-stakeholder ecosystem. We submit that the Application Provider should be designated as the primary entity responsible for obtaining authorisation for provisioning ALTD services. The rationale is set out below.

Roles Across the Ecosystem

Stakeholder	Primary Role
Application Provider	Distribution and consumer interface — closest functional equivalent to a DPO
Broadcaster/Content Owner	Content creation and origination
OS Provider / Smart TV Platform	Neutral horizontal platform — access layer only
Device OEM	Hardware provision — no editorial or distribution role

Rationale for Designating Application Provider as Primary Entity

1. Control over Consumer Interface

The application provider owns the user interface and content discovery layer. It determines channel listing and order, access conditions (free vs. subscription), and monetization models (AVOD/SVOD/FAST). This makes the application provider the closest functional equivalent to MSOs and DTH operators in traditional broadcasting.

2. Aggregation and Packaging Role

ALTD applications aggregate multiple broadcasters and channels, and may bundle channels, insert advertisements, and offer curated FAST channel streams. This editorial and commercial control strengthens the case for regulatory accountability resting at the application layer.

3. Direct Consumer Relationship

Billing, subscriptions, authentication, and consumer grievances are all managed at the application level. Regulatory frameworks globally place compliance responsibility where the consumer touchpoint exists.

4. Technology Neutrality and Future-Proofing

Regulating OS providers or device OEMs as broadcasting entities would constitute overreach into the device and technology ecosystem, potentially constraining innovation. Focusing regulation at the application layer avoids fragmentation of compliance responsibility and future-proofs the framework.

5. Alignment with Global Practices

Regulatory trends in the EU (under the Audiovisual Media Services Directive) and comparable jurisdictions focus on platform-level accountability and content distribution intermediaries — consistent with designating the application provider as the regulated entity.

It is reiterated that OS providers and device manufacturers play a facilitative role in a horizontal ecosystem. Attempting to regulate them as primary broadcasting entities would be disproportionate and may create unintended consequences for the broader technology sector.

Q3. Terms and Conditions for Grant of Service Authorisation to ALTD Application Providers

Response

ALTD Services represent an evolving mode of television channel distribution leveraging internet-based platforms. The authorisation framework should ensure regulatory parity with existing television distribution platforms, technology neutrality, ease of doing business, and consumer protection. The following terms and conditions are recommended.

(a) Service Area

The authorisation should be National (Pan-India). No state-wise authorisation should be required. ALTD Services operate over the internet and are not constrained by physical infrastructure or geography; a national authorisation ensures operational efficiency and regulatory clarity.

(b) Validity Period

The authorisation should be valid for 20 years, renewable for further periods of 10 years at a time. This aligns with existing broadcasting service authorisations and provides long-term regulatory certainty necessary for investment planning.

(c) Eligibility Conditions

The applicant entity should be incorporated in India and comply with applicable FDI policy. It must not have any record of conviction involving national security concerns, financial fraud, or content violations. Additionally, the entity must appoint a Grievance Redressal Officer and a Compliance Officer, both India-based.

(d) Minimum Net Worth

A minimum net worth of INR 10 crore is suggested . This ensures financial credibility while encouraging innovation and market entry by new players. Application providers must continuously invest in app maintenance (as OS updates require updates and adaptation), payment gateway security, DRM infrastructure, customer servicing systems, and backend operational requirements. The prescribed net worth ensures adequate financial capacity to sustain these obligations.

(e) Processing Fee

A non-refundable processing fee of ₹1 lakh is suggested to cover administrative costs incurred in processing the authorisation application.

(f) Entry Fee

A one-time non-refundable entry fee of ₹10 lakhs is suggested. This is lower than the entry fee for traditional platforms such as DTH and HITS, reflecting the lower physical infrastructure requirements of ALTD services. The entry fee ensures commitment and seriousness of applicants while not acting as an undue barrier to entry.

(g) Bank Guarantee

A Performance Bank Guarantee of ₹10 lakhs is recommended, to be released after 12 months of operationalisation of the platform which should be done with in 12 months of the grant of authorization. . The Bank Guarantee provides security for compliance with authorisation conditions and timely operationalisation.

(h) Authorisation Fee

A revenue share model of 3% of total revenue is recommended. We advocate for use of total gross revenue (rather than AGR) for authorisation fee calculation, as AGR determinations in the ALTD ecosystem are likely to be contested given the variety of revenue models and accounting practices among application providers. A simpler and more transparent computation basis will facilitate compliance.

(i) Security Deposit

No separate security deposit is required where a Bank Guarantee is already prescribed. This avoids duplication of financial obligations which sometimes act as barrier to entry of smaller players.

(j) Roll-Out Obligations

The ALTD service must be operational within 12 months of the grant of authorisation. Minimum requirements include a functional application/platform and availability of a minimum number of linear channels as may be specified. Given the digital nature of ALTD Services, geographically segmented rollout obligations are not appropriate; even a non-payment-linked rollout obligation should be achievable within the prescribed timeline.

(k) Other Terms and Conditions

Content Compliance

- Mandatory adherence to Programme Code and Advertising Code
- Only authorised/permitted channels by MIB should be distributed

Consumer Protection

- Mandatory grievance redressal mechanism with India-based officer
- Compliance with applicable consumer protection laws

Data Protection

- User data collection to be limited, transparent, and compliant with applicable data protection regulations. The data to be stored in India.

Transparency and Reporting

- Periodic reporting of subscriber/viewership metrics and revenue details

Non-Discriminatory Access

- Platform must provide fair and non-discriminatory access to content providers and broadcasters

Terms and Conditions for Foreign Entities

Given the global nature of ALTD Services, the following conditions are recommended for foreign entities:

- Mandatory establishment of an Indian subsidiary or appointment of an authorised Indian representative
- Foreign entities must obtain authorisation under the same framework, either through their subsidiary or through an authorised Indian representative
- Compliance with Indian Programme Code and Advertising Code, with local grievance and compliance officers
- Sensitive user data to be stored in India or made accessible to Indian authorities
- Mandatory reporting of revenue generated from Indian users, advertisement earnings, and any other platform revenue
- Adherence to sectoral FDI caps and conditions applicable to broadcasting and digital media

Q4. Common Terms and Conditions for Authorised ALTD Entities

Response

Given the digital and platform-based nature of ALTD services, the regulatory approach should ensure parity with existing distribution platforms while maintaining flexibility, innovation, and ease of doing business. The following positions are submitted in respect of each sub-question.

(a) Renewal of Authorisation

Renewal should be automatic and simplified, subject to continued compliance with regulatory conditions, absence of violations of Programme Code/Advertising Code, and payment of renewal fee. No fresh market entry barriers should be imposed at the time of renewal. A renewal application window of six months prior to expiry may be prescribed.

(b) Renewal Fee

The renewal fee should be nominal and consistent with administrative cost recovery principles. High renewal fees should be avoided as they create barriers to long-term investment and may force market exit by smaller players. The renewal fee should be aligned with the fee prescribed for comparable broadcasting services.

(c) Equity Holding and Management Control

ALTD service providers should be compliant with applicable FDI policy and sectoral caps. Full disclosure of shareholding pattern and ultimate beneficial ownership should be mandatory. Management control should remain transparent and accountable, particularly for entities with foreign participation. Any indirect control through technology platforms, operating systems, or overseas entities must be explicitly disclosed and regulated. Effective control should remain within the regulatory jurisdiction of India.

(d) Restriction on Cross-Holding

(i) Between TV Broadcasters and ALTD Application Providers

We do not recommend imposing strict cross-holding restrictions between broadcasters and ALTD application providers, given the evolving competitive landscape and the fact that consumers today have multiple platforms and service providers available to them. The market itself provides a corrective mechanism. However, the following mandatory safeguards are recommended:

- Non-discriminatory carriage of all licensed channels on the ALTD platform
- No exclusive agreements with any device manufacturer, marketing company, or platform
- Agreements with platforms and device manufacturers/marketers to be placed on record with the licensor/regulator for scrutiny

(ii) Between ALTD Providers and Other Distribution Platform Operators

Cross-holding between ALTD providers and other DPOs (DTH, IPTV, MSO) may be permitted subject to disclosure requirements and safeguards against anti-competitive conduct, including no exclusive agreement with any device manufacturer or platform, and ensuring fair competition across distribution platforms.

(e) Transfer/Surrender of Service Authorisation

Transfer of authorisation should be permitted with prior approval of the licensor, subject to fulfilment of eligibility and compliance conditions. Surrender should be permitted with advance notice of 90 days, subject to settlement of all outstanding AGR dues (with a certificate from the Statutory Auditor) and consumer protection measures including exit notice and refund of any charges paid by customers in advance.

(f) Sharing of Infrastructure

Infrastructure sharing should be explicitly permitted to promote efficiency, reduce duplication of resources, and encourage innovation and scalability. Shareable infrastructure includes cloud infrastructure, content delivery networks (CDNs), and platform technologies. The responsibility for regulatory compliance should remain with the authorised entity at all times.

(g) Other Terms and Conditions

Non-discriminatory onboarding and transparent, fair carriage terms should be mandatory. A clear demarcation of responsibility should be maintained between the broadcaster (content) and the platform (distribution due diligence and takedown). Mandatory grievance redressal with India-based officers, compliance with data protection laws, light-touch periodic reporting, and avoidance of walled-garden ecosystems are all recommended. Mandatory content monitoring capability and availability of records and logs for regulatory scrutiny are non-negotiable, as the absence of archiving and monitoring is not tenable in a regulated broadcasting environment.

Q5. Specific Terms and Conditions for Authorised ALTD Entities

Response

ALTD Services, by virtue of distributing linear television channels to the public, are functionally equivalent to existing licensed DPOs. The specific terms and conditions applicable to ALTD authorised entities should reflect this equivalence while adapting for the digital platform context.

(a) Reservation of Operational Channel Capacity by Vertically Integrated Entities

While prescribing a hard cap on the number of owned channels to be carried is not a practical approach, it must be ensured that third-party channels are given non-discriminatory access to the ALTD platform. Vertically integrated entities must ensure that discoverability mechanisms, including UI/UX design, EPG placement, and recommendation algorithms, are transparent, non-discriminatory, and subject to regulatory oversight or audit. These measures are essential to prevent anti-competitive practices and ensure a level playing field. Market forces will themselves incentivise ALTD platforms to carry a broad range of channels, as a platform carrying only one broadcaster's content is unlikely to attract a sufficiently large subscriber base to be commercially viable.

(b) Platform Services Offered by ALTD Application Providers

ALTD platforms offering curated linear streams analogous to Platform Services (PS) must be regulated in a manner similar to PS channels under the existing cable television regulatory framework. No licensed satellite television channel should be retransmitted without due authorization from the channel owner. A clear distinction must be maintained between licensed broadcast channels and platform-originated content streams. While no numerical cap on the number of PS channels is recommended, non-discriminatory access for third-party services must be prescribed. All such services must comply with the Programme Code and Advertising Code under the Cable Television Networks (Regulation) Act, 1995.

(c) Monitoring and Inspection

Authorised ALTD entities must be subject to robust monitoring and inspection requirements. ALTD providers should be mandated to maintain recordings and logs of all linear content streams for a minimum period of 90 days, and provide real-time or near real-time access to authorised government agencies and TRAI as may be prescribed. Infrastructure, including cloud-based systems, should be auditable and hosted or mirrored in India to ensure enforceability.

(d) Supply of Information to Central Government/TRAI

ALTD providers should be required to furnish periodic and event-based disclosures including details of channels onboarded and their licensing/permission status, revenue-sharing arrangements with broadcasters/content providers, advertisement inventory and monetisation practices, aggregated and anonymised viewership/subscription data, and high-level information on content curation and recommendation practices. Additionally, violations and consumer complaints with resolution status should be reported. A biannual online provision of the information will be appropriate without putting too much administrative strains.

(e) Contravention of Terms and Conditions

A graded enforcement and penalty framework is recommended, including financial penalties for minor and procedural violations, suspension of specific channels/services for content-related violations, and suspension or revocation of authorisation for serious or repeated breaches including unauthorised distribution of channels. The penalty framework should be aligned with the civil penalty structure recommended under the broadcasting authorisation framework for consistency.

Applicability of Mandatory Broadcasting Obligations

Sharing of Sports Broadcasting Signals with Prasar Bharati

The obligation relating to mandatory sharing of sports broadcasting signals with Prasar Bharati should be made applicable to ALTD platforms where they distribute linear sports channels. This is necessary to ensure continued public access to events of national importance and to prevent circumvention of statutory obligations through exclusive distribution on proprietary ALTD platforms.

Mandatory Carriage of Notified Channels

ALTD platforms should be subject to must-carry obligations, including carriage of Doordarshan channels and any other channels notified in public interest, to ensure parity with existing DPOs and safeguard public service broadcasting objectives.

Q6. Assurance and Certification Mechanism for TV Manufacturers and OS Providers

Response

An effective assurance and certification framework for television manufacturers and operating system (OS) providers must be technology-neutral, enforceable, and aligned with the existing authorisation regime under MIB. The following framework is recommended.

1. Mandatory Authorised Application Registry

MIB should maintain a centralised digital registry of authorised ALTD application providers. Television manufacturers and OS providers shall be permitted to pre-install or host/distribute via app stores only those applications that are listed in the MIB Authorised Registry. Integration through APIs should be mandated for real-time verification of authorisation status.

2. Self-Certification with Legal Undertaking

All television manufacturers and OS providers should be required to submit periodic self-certifications (e.g., annual) confirming that only MIB-authorized ALTD applications are enabled on their platforms and that no unauthorised linear TV services are discoverable via default UI/EPG/launcher interfaces. Such certification must be backed by a legally binding undertaking with liability for misrepresentation. It is a separate matter of discussion that should the TV manufacturers also be subject to verification of their softwares via STQC for security purposes.

3. Independent Audit and Compliance Verification Audiovisual Media Services Directive

A system of third-party independent audits empaneled by MIB/TRAI should be prescribed, covering preloaded apps, app store listings, and recommendation engines. Audits should be conducted periodically or on a risk-based trigger mechanism, with reports submitted to the regulator.

4. App Store Governance Framework

OS providers operating application stores must implement KYC and authorisation verification of app developers offering ALTD services, automated compliance checks before publishing or updating apps, and swift takedown (within defined timelines) of unauthorised ALTD applications or applications found in violation of Programme Code/Advertising Code.

5. Device-Level Technical Safeguards

TV manufacturers and OS providers should incorporate whitelist-based provisioning for ALTD apps linked to the MIB registry, periodic syncing mechanisms to disable or delist unauthorised apps post-installation, and default interfaces (home screen, EPG, channel rails) that do not promote or surface unauthorised services. These are possible as the devices are connected devices and thus updation, deletion of the apps is possible.

6. Allocation of Liability

While the application provider remains the primary authorised entity, TV manufacturers and OS providers must bear secondary compliance responsibility for hosting or enabling access to authorised ALTD services. Non-compliance should attract graded penalties including financial disincentives, directions for app removal, and in extreme cases, restrictions on platform operations.

7. Consumer Transparency

Devices and app stores should display a "MIB Authorised" badge/tag for verified ALTD applications, enhancing consumer awareness and supporting informed choice. The entire framework should be implemented online with minimal human interface, ensuring efficient record-keeping and effective cross-verification.

Q7. Assurance Mechanisms for Carriage of Only Authorised Channels by ALTD Providers

Response

It is a settled regulatory principle in India that no television channel may be distributed for public viewing without prior permission/registration from MIB. The emergence of ALTD services has created a regulatory gap in this regard. A robust, technology-enabled assurance and enforcement framework is therefore necessary.

Recommended Assurance Mechanisms

1. Mandatory Pre-Onboarding Verification

- Mandatory verification of MIB permission status prior to onboarding any channel
- Documented audit trail of MIB permission/registration details, validity period, and rights for India distribution
- Integration with a centralised MIB digital registry of permitted channels

2. Continuous Compliance and Real-time Monitoring

- Automated compliance systems for periodic validation of channel authorisation status
- Geo-fencing mechanisms to ensure only India-permitted feeds are distributed within India
- AI-based content recognition tools for channel identification and verification

3. Self-Certification and Periodic Compliance Filings

- Quarterly online self-certification filings to TRAI/MIB confirming all carried channels are duly authorised

4. Content Traceability and Record-Keeping

- Mandatory content logging and archival for a minimum of 90 days
- Ability to identify source of each channel and trace content provider and rights ownership

5. Platform-Level Channel Whitelisting

- Only channels present in the MIB-approved whitelist shall be allowed to stream
- App stores and Smart TV OS providers shall allow hosting only of compliant ALTD applications

Enforcement Framework: Penalties and Deterrents

Violation Category	Recommended Penalty
Minor non-compliance	Warnings, Temporary suspension, or financial penalty.
Major violation (unauthorised channels)	Financial Penalty plus longer suspension and daily penalties for continuing violations
Repeated violations	Blacklisting of platform/application provider; restriction from future authorisations (Max 3 violations and this triggers in)
Systemic non-compliance by OEMs/OS providers	Compliance notices; mandatory app removal directions
Wilful/repeated national security-related violations	Referral under applicable laws and termination of the authorisation.

Q8. Specific Terms and Conditions for Value-Added Services Offered by ALTD Providers

Response

There is a clear and compelling need to prescribe specific terms and conditions governing value-added services (VAS) offered by ALTD service providers. In the evolving ALTD ecosystem, application providers actively provide additional layers of services such as targeted advertising, interactive features, content recommendations, enhanced electronic programme guides (EPG), and other data-driven functionalities. In the absence of a defined regulatory framework, such VAS could

circumvent extant broadcasting regulations, distort the integrity of linear television channels, create regulatory arbitrage vis-à-vis licensed DPOs, and raise concerns relating to consumer protection and data privacy.

Suggested Terms and Conditions for VAS

Regulatory Parity

All VAS linked to or integrated with television channel distribution shall be deemed to form part of Television Channel Distribution Services and subject to the same regulatory framework applicable to authorised entities.

Declaration and Approval Mechanism

ALTD service providers shall mandatorily declare all VAS at the time of seeking authorisation. New categories of VAS shall require prior intimation and/or approval of the Authority in the prescribed format ; where no response is received within 30 days of filing, the application shall be deemed approved (deemed approval principle).

Content Integrity and Advertising Compliance

No alteration, overlay, insertion, or substitution of content, including advertisements, shall be permitted on linear television channels without explicit authorisation from the broadcaster. All VAS including interactive advertising shall comply with Programme Code and Advertising Code under the Cable Television Networks (Regulation) Act, 1995.

Consumer Protection and Transparency

Explicit and informed user consent shall be obtained for targeted advertisements and use of personal or behavioural data. Platforms shall clearly disclose the nature and scope of VAS, whether services are free or chargeable, and the extent of personalisation and targeted advertising.

Non-Discriminatory Practices

VAS shall not unfairly promote or suppress specific channels, distort channel discoverability through EPG manipulation, or result in discriminatory treatment of broadcasters.

Revenue Sharing and Commercial Transparency

Any monetisation arising from VAS, including advertisement revenues or promotional placements, shall be governed by transparent and mutually agreed arrangements with broadcasters/content providers and must not contravene existing tariff orders or interconnection regulations.

Q9. Mandatory Authorisation Requirement for Broadcasters Providing Channels on ALTD Platforms

Response

Broadcasters and content owners providing television channels on ALTD platforms must be mandatorily required to obtain appropriate authorisation, specifically under the Ground-based Broadcasting (GBB) authorisation framework, prior to entering into any arrangement with ALTD service providers. Ground-based Broadcasting authorisation is the appropriate category because the channel content is not being uplinked to a satellite, and therefore does not fit within the uplinking and downlinking guidelines framework.

Need for Mandatory Authorisation

Regulatory Parity

Traditional broadcasters distributing channels through DTH, cable, IPTV, or HITS platforms are required to obtain prior permission/authorisation from MIB under uplinking/downlinking guidelines. Channels made available on ALTD/FAST platforms bypassing such requirements create regulatory asymmetry. No television channel is permitted for public viewing in India without registration/permission from MIB, irrespective of the mode of distribution.

Content Accountability

Authorisation ensures that broadcasters are subject to Programme Code, Advertising Code, and other content-related obligations. In the absence of such authorisation, there is no enforceable accountability framework, particularly for overseas content providers, aggregators, or non-licensed entities.

Technology-Neutral Framework

The requirement for authorisation should be technology-neutral, applicable regardless of whether the channel is delivered via satellite-based broadcasting or ground-based/internet-based transmission mechanisms. This is consistent with TRAI's recommendation that broadcasting services can be delivered through both satellite and terrestrial (including broadband and cloud-based) mediums.

Recommended Regulatory Approach

All broadcasters/content owners intending to provide television channels on ALTD platforms shall obtain Ground-based Broadcasting authorisation (or satellite-based broadcasting authorisation where applicable) prior to entering into any agreement with ALTD service providers. The term 'television channel' shall include linear scheduled channels, FAST channels, and any curated linear streams resembling traditional television broadcasting. Any entity exercising editorial control over such channels shall be treated as a 'broadcaster'. ALTD service providers shall not carry or distribute any television channel unless the broadcaster/content owner has obtained valid authorisation; a self-certification/verification mechanism may be prescribed to ensure compliance.

Q10. Pricing Methodology for Price Parity of Television Channels Across ALTD Platforms

Response

The emergence of ALTD and FAST platforms has disrupted the traditional pricing architecture of television distribution in India. These platforms often distribute linear TV channels — sometimes including pay channels — either free (ad-supported) or at pricing structures inconsistent with regulated platforms such as cable, DTH, and IPTV. A platform-neutral, content-centric pricing framework is recommended.

"Same Content, Same Price, Same Rules" — Recommended Principles

(A) Uniform MRP Declaration by Broadcasters

Every television channel (pay or free-to-air) must have a uniform Maximum Retail Price (MRP) declared by the broadcaster. This MRP shall be platform-agnostic, identical across Cable TV, DTH, IPTV, and ALTD/FAST platforms.

(B) Mandatory Non-Discriminatory Licensing

Broadcasters must offer channels to ALTD platforms on a non-discriminatory basis, consistent with existing interconnection regulations. No preferential pricing or exclusive discounting for ALTD platforms shall be permitted.

(C) Prohibition on Free Conversion of Pay Channels

A channel classified as a pay channel under TRAI tariff orders must not be offered free (including ad-supported free streaming) on ALTD platforms. Pay channels are being offered on FAST platforms by certain broadcasters, which breaks the pricing architecture and erodes subscription revenues across the ecosystem. Any change in monetisation model must require prior declaration and reclassification as Free-to-Air.

(D) Revenue-Equivalence Principle for Hybrid Models

Where ALTD platforms operate on an advertisement-supported model and a pay channel is distributed without subscription, the channel must be reclassified as FTA as otherwise it disturbs the equilibrium with other distribution platforms such as cable networks and DTH.

(E) Bouquet Pricing Parity

Broadcasters offering bouquets must ensure the same bouquet composition and pricing across all platforms. ALTD platforms should not be allowed to break bouquets selectively or offer deep discounts outside regulatory norms.

(F) Technology-Neutral Tariff Regulation

TRAI's existing tariff orders should be explicitly extended to ALTD platforms. Regulatory classification should be based on the nature of the service (linear TV distribution), not the technology (internet vs. cable/satellite).

Q11. Consumer Protection and Grievance Redressal Obligations for ALTD Service Providers

Response

All authorised ALTD service providers should be treated as Television Channel Distribution Service Providers and must be subject to minimum consumer protection and grievance redressal obligations equivalent to DPOs, with appropriate adaptations for digital delivery.

Consumer Protection Obligations

Obligation	Details
Transparency & Disclosure	Complete channel list, nature of service, advertising practices, ownership structure, terms of service and privacy policy
Service Quality	Minimum QoS benchmarks (stream reliability, channel availability, ad-load thresholds); uniform experience across smart TVs, mobile, Set top Boxes and web
Content Authenticity	Only MIB-authorised channels; mandatory compliance with Programme Code and Advertising Code
Data Protection	Explicit consent for data collection; restriction on PII collection; compliance with data protection laws; disclosure of data sharing
Billing/Monetisation Transparency	Clear disclosure of subscription charges, in-app purchases, and ad-supported nature; carriage charges, no misleading 'free' claims

Mandatory Three-Tier Grievance Redressal Framework

Tier 1: Platform-Level Grievance Redressal

- Dedicated India-based Grievance Officer
- Multiple complaint channels: in-app, website, and email
- Acknowledgement within 24 hours; resolution within 15 days

Tier 2: Self-Regulatory Body

- Industry-led body for escalation of unresolved complaints
- Ensures uniform interpretation of content and service norms

Tier 3: Statutory Oversight (TRAI/MIB)

- Final appellate authority with power to impose penalties, suspend services, or remove non-compliant channels/apps

Where foreign entities are involved, the Indian authorised entity must remain legally accountable; no pass-through of grievance responsibility to overseas platforms should be permitted.

Q12. Methodology for Integrating ALTD Service Data into the Television Ratings Framework

Response

The inclusion of ALTD services into audience measurement is both necessary and inevitable given evolving consumption patterns. A hybrid and technology-neutral measurement framework is required. Though the top level matrix collection in case of internet connected devices is much simpler and smoother and instantaneous. The information can be collected as the devices are connected and viewer profile are stored as the user.

Recommended Methodology: Hybrid Panel + Census Data Fusion

Panel-Based Measurement (Baseline)

Being a connected devices here the restrictions of number of devices is overcome here the selection of the panel based on the demography and geography is more critical. The data retrieval can be fast and in few cases can be instantaneous, the initial approach can be continue using representative sample households to ensure demographic balancing and continuity with existing TV ratings, providing statistical robustness and comparability with legacy ratings.

Census-Level Data from ALTD Platforms

Collect return-path data (RPD) from ALTD platforms (smart TVs, apps, web, STB's S Monga) including device-level viewership, watch time, session duration, and channel switching behaviour.

Fusion Model

Combine panel data with census data using statistical modelling. The panel corrects biases in census data (e.g., device skew, urban bias), while census data enhances granularity and scale.

Proposed Implementation Timeline

Phase	Activities and Timeline
Phase 1: Framework Design	Finalisation of measurement standards, data definitions, and reporting formats; stakeholder consultation (0–6 months)
Phase 2: Pilot Implementation	Limited rollout with select ALTD platforms and broadcasters; testing of data fusion models and cross-platform measurement (6–12 months)
Phase 3: Gradual Scale-up	Expansion to all authorised ALTD entities; integration with existing TV ratings; initial release of blended ratings (12–24 months)
Phase 4: Full Integration	Unified national audience measurement system; mandatory compliance; phasing out of siloed systems (24–36 months)

Measurement must uniformly cover smart TV preloaded apps, downloaded applications, websites, and mobile/tablet applications. There are now smart Set top boxes also coming in the market which enable the legacy televisions to use the apps, those should be covered in the regulations. Third-party independent audits are essential to ensure credibility and neutrality.

Q13. Alignment of Self-Published Viewership Data with the Authorisation Framework

Response

Allowing ALTD and OTT platforms to publish periodic viewership data without prior registration can improve transparency and industry insights. However, unregulated publication carries significant risks including selective disclosure, data manipulation, lack of comparability, and distortion of advertising markets. Such enablement should therefore be aligned with the authorisation framework through the following conditions.

- Publication of viewership data should be permitted only for authorised ALTD entities
- TRAI should prescribe standard metrics (AMA, Reach, Watch Time), uniform reporting formats, and minimum disclosure requirements

- Platforms publishing viewership data must disclose the methodology used, coverage, limitations, and whether data is independently audited (if audited then by whom) or self-reported
- Periodic independent audits should be mandated to ensure credibility and neutrality
- Self-published data should not substitute official audience measurement systems and must be clearly labelled as platform-level analytics or supplementary data
- Only aggregated and anonymised data should be published; PII and sensitive demographic profiling must not be disclosed
- Platforms must not publish biased rankings favouring affiliated channels or suppress data of competing broadcasters

A phased implementation approach is recommended: Phase 1 (0–6 months) for defining standards; Phase 2 (6–12 months) for controlled pilot publication; and Phase 3 (12–24 months) for full-scale implementation with mandatory compliance and audit.

Q14. Regulatory Framework for Hybrid Business Models (Free and Paid Services)

Response

ALTD service providers are likely to operate under hybrid business models combining Free Ad-Supported Streaming Television (FAST) channels and paid subscription-based linear channels. A balanced, technology-neutral, and proportionate regulatory framework is required, guided by the principle of "Same service, same rules — proportionate to the nature of service and level of consumer impact."

Differential Treatment Framework

Regulatory Aspect	Free (FAST) Services
Tariff	No direct tariff regulation; transparency in advertising load and monetisation required
Interconnection	Basic Free, Reasonable and Non Discriminatory(FRAND) principles; transparency in commercial arrangements
QoS	Baseline quality standards
Consumer Protection	Moderate obligations; transparency and disclosure focus

Regulatory Aspect	Paid (Subscription-based) Services
Tariff	Light-touch extension of TRAI Tariff Order principles; non-discriminatory MRP across platforms
Interconnection	Full FRAND + pricing parity obligations; prevention of exclusive arrangements
QoS	Stricter QoS norms; mandatory complaint resolution timelines
Consumer Protection	Strong obligations; billing transparency; grievance mechanism

Phased Implementation

- Phase 1 (0–12 months): Authorisation regime; basic QoS and transparency norms; no heavy tariff regulation
- Phase 2 (12–24 months): Tariff parity rules for paid channels; interconnection guidelines
- Phase 3 (24+ months): Full alignment with broadcasting regulatory framework; periodic review

Q15. Additional Issues for Consideration in the ALTD Regulatory Framework

Response

The ALTD ecosystem introduces several platform-layer concerns not fully covered in the Consultation Paper that are critical for ensuring fair competition, consumer choice, and platform neutrality.

Key Additional Issues and Recommendations

2.1 Channel Positioning and Home Screen Prominence

ALTD platforms control home screen layout, featured content rows, and default channel/app placement, creating a gatekeeping role enabling preferential treatment to affiliated or paid/promoted content. Non-discriminatory and transparent positioning policies should be mandated, with disclosure of ranking/placement criteria and labelling of sponsored/promoted placements.

2.2 Electronic Programme Guides (EPGs) and Discovery Mechanisms

ALTD platforms may not follow standardised EPG structures, and algorithm-driven discovery may bias visibility. Minimum EPG/discovery standards including logical channel listing, search neutrality, and equal visibility for similarly placed channels should be prescribed.

2.3 Revenue Sharing and Commercial Transparency

Revenue models vary widely, with ad revenue sharing and inventory control practices lacking transparency. Transparent revenue-sharing agreements, disclosure of ad inventory split and monetisation rights, and standardised contractual templates (industry-led) are recommended.

2.4 Interconnection and Platform Access Agreements

ALTD platforms may impose restrictive onboarding conditions or exclusive/bundled arrangements. Broad FRAND-based interconnection principles and transparency in carriage terms and marketing/placement fees should be introduced, with prohibition of anti-competitive exclusivity.

2.5 Default Apps and Pre-Installation Practices

Smart TV OEMs often pre-install ALTD apps and make them non-removable, distorting competition. User choice to uninstall or disable apps, prohibition of forced default selection without user consent, and transparency in pre-installation agreements are recommended.

2.6 Data Ownership, Sharing, and Competitive Use

Platforms collect granular viewership data that could be misused to preference own content or withheld from broadcasters. Data ownership and access rights should be clearly defined, with sharing of relevant performance data with broadcasters and prohibition of anti-competitive use of data.

2.7 Advertising Regulation and Ad Load

FAST channels may exceed traditional ad load limits and use targeted/dynamic advertising. Harmonisation with existing advertising norms under the Programme and Advertising Code should be considered, with transparency in ad load and consumer protection against misleading advertisements.

2.8 Cross-Border Content and Jurisdiction

Many ALTD services involve overseas entities and cross-jurisdictional content aggregation. The regulatory responsibility of the Indian entity should be clearly specified, with mandatory compliance with Indian laws irrespective of hosting location.

International Best Practices

Jurisdiction	Relevant Framework and Relevance for India
European Union	AVMSD — prominence and discoverability; Digital Markets Act — non-discriminatory platform access. Model for regulating smart TV OS providers and platform dominance.

United Kingdom	Ofcom — 'appropriate prominence' for public service broadcasters; connected TV platform regulation. Highlights importance of EPG and home screen regulation.
United States	Market-led standards + FTC oversight; increasing scrutiny on platform data practices and advertising transparency. Supports light-touch but enforceable transparency regime.
Australia	Prominence and discoverability rules for smart TVs; fair access for broadcasters on connected devices under review.

Suggested Regulatory Approach for India

Principles-Based and Targeted Intervention

Avoid over-regulation at the early stage. Focus on transparency, non-discrimination, and consumer choice, with targeted intervention where market failures are evident.

Co-Regulatory Model

Industry-led codes for revenue sharing and placement practices, backed by regulatory oversight by TRAI and MIB. Phased implementation: Phase 1 — transparency and disclosures; Phase 2 — standardisation and safeguards; Phase 3 — competition and platform neutrality rules.

Concluding Remarks

In view of the submissions made above, the regulatory framework for ALTD services should be built on the principle of functional equivalence with licensed Distribution Platform Operators, while remaining technology-neutral and forward-looking. The following overarching recommendations are reiterated:

- Application providers should be designated as the primary authorised entity, with OS providers and device OEMs bearing secondary compliance responsibility
- The authorisation framework should ensure regulatory parity with existing television distribution platforms across all key dimensions including fees, content obligations, and consumer protection
- A 'Same Content, Same Price, Same Rules' principle should govern pricing and tariff regulation to prevent regulatory arbitrage
- Platform-layer issues including home screen prominence, EPG standards, revenue sharing, and data governance require explicit regulatory attention
- A phased, co-regulatory implementation approach drawing from international best practices will best serve India's evolving broadcasting ecosystem

The we respectfully urges TRAI to give due consideration to the positions articulated herein and to adopt a comprehensive, enforceable, and innovation-friendly regulatory framework for ALTD services that protects consumer interests, ensures a level playing field, and promotes the orderly growth of the broadcasting sector in India.