

**RunnTV (Runn Media Labs)'s Response
to
Consultation Paper on Formulation of a Regulatory
Framework for Application-based Linear Television
Distribution (ALTD) Services (Including Free Ad-Supported
Streaming Television (FAST) Services)**

Consultation Paper No. 02/2026



Submission Date: 04-May-2026

To,

Dr. Deepali Sharma

Advisor (B&CS)

Telecom Regulatory Authority of India (TRAI)

Dear Madam,

I am writing to submit RunnTV's response to the consultation on the regulatory framework for "Aggregated Linear Television Distribution (ALTD)" services.

RunnTV is India's first independent and among the fastest growing FAST-led streaming platforms, and through our broader ecosystem including PlayStudio tech solution, we are actively building next-generation infrastructure for linear streaming, ad-tech, and digital content distribution. We are also in the process of expanding internationally, reflecting the opportunity for India to build globally competitive platforms in this emerging category.

At the outset, we would like to highlight that ALTD/FAST services represent a natural evolution of television in the digital era. These services operate as application-based OTT platforms over the open internet and are fundamentally different from traditional broadcast distribution systems in terms of technology, cost structures, consumer behaviour, and business models.

Accordingly, our core submission is that ALTD services should be treated and regulated in line with OTT/streaming platforms, and not under broadcast or DPO-style regulatory frameworks.

A light-touch, technology-aligned regulatory approach is critical at this stage to:

- Enable innovation and investment in a nascent but high-potential ecosystem
- Support Indian startups and MSMEs participating in digital media
- Encourage development of a robust open internet advertising market in India
- Retain audiences within the regulated ecosystem amid rising cord-cutting trends
- Position India as a global leader in next-generation content distribution

It is important to note that the broader ecosystem is already evolving in support of ALTD/FAST:

- Broadcasters are increasingly choosing to distribute content on these platforms, recognising changing consumption patterns and new monetisation opportunities
- Advertisers are gradually allocating budgets toward digital and FAST ecosystems
- Measurement agencies are actively working toward integrating digital viewership frameworks

At the same time, the transition from traditional distribution models to digital platforms is understandably accompanied by differing perspectives across stakeholders. In this context, we respectfully submit that regulatory frameworks should enable innovation and competition,

while ensuring that emerging models are not constrained by legacy structures that were designed for fundamentally different technologies.

We also believe that ALTD presents a unique opportunity for India to create “from India to the world” platforms, driven by indigenous innovation in streaming technology, ad-tech, and content distribution. Over-regulation at this stage may risk limiting this opportunity and disproportionately favouring large global incumbents.

Our detailed responses to each of the consultation questions are enclosed, along with specific recommendations aimed at fostering a balanced, forward-looking regulatory approach.

We appreciate TRAI’s initiative in engaging with stakeholders on this important subject and would be pleased to provide any further inputs or participate in discussions as required.

Yours sincerely,

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Executive Summary

1. Core Position

ALTD/FAST services represent the next phase of television and digital content distribution, operating as application-based OTT services over open internet.

They should therefore be:

- Categorized and regulated as OTT/streaming services
- Governed under:
 - Digital Media Ethics Code
 - Existing IT and consumer protection frameworks

They should not be brought under broadcast or DPO-style regulatory frameworks.

2. Fundamental Distinction from Broadcast Distribution

ALTD/FAST services:

- Do not use:
 - Spectrum
 - Satellite
 - Cable infrastructure
- Operate on:
 - Open internet
 - Application-layer delivery

A majority (70%+) of channels are:

- Digital-only channels
- Created from existing content libraries already available on OTT platforms and YouTube

Just the linear presentation of the same content does not transform streaming into broadcasting.

3. Economic and Structural Differences Make Broadcast Regulation Inapplicable

ALTD and traditional TV operate on fundamentally different models:

Dimension	Traditional TV (DPO)	ALTD/FAST
Cost Structure	Fixed	Consumption-linked (CDN, SSAI)
Revenue Model	Subscription	Advertising-led

Distribution	Infrastructure-heavy	Internet-based
Switching Cost	High	Near-zero
Pricing Logic	Fixed monthly	Usage-driven

Imposing pricing parity or tariff regulation would make ALTD models unviable.

4. Role in Industry Evolution and Digital Economy

ALTD/FAST enables:

- Monetisation of content libraries
- Expansion of audience reach
- Growth of open internet advertising ecosystem
- Participation of:
 - Startups
 - MSMEs
 - Creator economy

It also helps retain/add TV viewers - cord-cutters and cord-nevers within the broader TV ecosystem. Without ALTD, these audiences risk migrating entirely to global walled gardens or unregulated platforms.

5. Innovation, Investment and “India to the World” Opportunity

ALTD platforms:

- Require: High ongoing investments (CDN, SSAI, tech infrastructure)
- Enable: Indian innovation in streaming and ad-tech
- Attract: Foreign direct investment into India
- Support: Global expansion of Indian platforms

Heavy regulation at this stage would disproportionately impact startups and MSMEs, and shift advantage to large global incumbents.

6. Global Regulatory Alignment

Across key markets (US, EU and others):

- FAST/OTT services are:
 - Governed under light-touch frameworks
- Not subject to:
 - Licensing
 - Tariff controls
 - Channel placement regulation

This approach has enabled:

- Emergence of global FAST leaders
- Rapid innovation and ecosystem growth

India should align with global best practices to remain competitive.

7. Balanced Ecosystem Perspective

The evolution toward ALTD/FAST is being supported across key stakeholders:

- Broadcasters are increasingly distributing content on ALTD platforms, recognising:
 - New monetisation opportunities
 - Changing consumption patterns
- Advertisers are:
 - Gradually reallocating budgets toward ALTD
 - Exploring targeted and digital-first advertising models
- Measurement agencies are:
 - Actively working toward integrating digital and cross-platform measurement frameworks

At the same time:

- Some stakeholders within traditional distribution ecosystems have expressed concerns regarding this transition

It is important to recognise that digital evolution is a natural progression of the industry, and all participants—including existing distribution players—have the opportunity to participate in and benefit from this transition. Many have already begun doing so through their own digital and OTT offerings.

Regulatory frameworks should therefore enable innovation and competition, rather than constrain emerging models in order to preserve legacy structures and power concentrations.

8. Regulatory Recommendations

We recommend:

A. No Licensing / Authorisation Framework

- ALTD should not require:
 - Licensing
 - Entry fees
 - Net worth requirements

B. OTT-Aligned Compliance

- Governed under:
 - Digital Media Ethics Code
- Shared responsibility:
 - Content → Channel owner
 - Platform → Distribution and ad compliance

C. No Tariff, Interconnection or DPO-Style Obligations

- No:
 - Pricing parity
 - Channel placement rules
 - Interconnection frameworks

D. Digital-First Measurement Framework

- Census-based (not sample-based)
- Separate measurement for ALTD ecosystem

E. Market-Driven Commercial Ecosystem

- Revenue sharing
- Discovery
- Placement

All should remain commercial and flexible

F. Light-Touch Consumer Protection

- OTT-aligned grievance redressal
- Platform-level accountability

9. Conclusion

ALTD/FAST represents a critical opportunity for India to build a future-ready, globally competitive digital media ecosystem.

Applying legacy broadcast regulation to ALTD would be structurally inappropriate and would risk stifling innovation, investment, and competition at an early stage.

A light-touch, OTT-aligned regulatory approach will:

- Enable innovation
- Support startups and MSMEs
- Attract investment
- Retain audiences within the regulated ecosystem
- Position India as a global leader in next-generation media distribution

Detailed Responses

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?

RunnTV’s Response

Proposed Definition

“Application-based Linear Television Distribution (ALTD) Services, including FAST, are digital, internet-based streaming services delivered via applications or web interfaces, where audio-visual content is primarily distributed over the open internet and may be presented in a linear or scheduled format in addition to on-demand formats”.

ALTD (including FAST) must be categorised as an extension of OTT/streaming services, and not as broadcasting or distribution platform services (DPOs).

1. ALTD is fundamentally an OTT / Internet Streaming Service

- ALTD platforms:
 - Operate over open internet (not managed networks)
 - Are application-driven (not infrastructure-driven)
 - Are user-pull based (not push broadcast)

Therefore, ALTD is structurally identical to all OTT/streaming platforms such as Amazon MX Player, JioHotstar, Netflix, Aha, Hoichoi, Stage etc.

The only distinction is:

Mode of presentation: linear/scheduled vs on-demand

This difference is UI/UX level, not regulatory or structural.

2. Linear presentation ≠ Broadcasting

The presence of linear/scheduled streams does not convert OTT into broadcasting.

If linearity alone is treated as “broadcast-like”, it leads to regulatory inconsistency:

- Live streaming on YouTube, Facebook and other social media platforms
- Live sports streaming on OTT platforms
- Scheduled live sessions by creators on Instagram and other social media platforms.
- Live streaming on websites and apps

By the same logic, all of these would become “broadcasting or distribution platform services”, which is clearly not the intent of current policy.

Therefore, linearity is not a valid criterion for classification as broadcasting or distribution platform services.

3. ALTD content is predominantly digital-first (VOD-to-Live)

- Majority of FAST channels are:
 - VOD-to-live channels
 - Created from existing on-demand content libraries
- This content:
 - Already exists on:
 - OTT platforms
 - YouTube
 - Is simply repackaged into:
 - Scheduled playlists

No new “broadcast content creation” is happening — only content presentation format is changing.

4. Presence of TV channels does not change nature of ALTD

- Some ALTD platforms may carry licensed TV channels
- However:
 - These channels are already:
 - Licensed by MIB
 - Compliant with Programme & Advertising Codes

ALTD platforms in such cases act as:

Digital distribution extensions of already licensed channels

This is analogous to:

- TV channels streaming on:
 - Their own apps and Websites
 - YouTube
 - Facebook and other social media platforms

These are not treated as broadcasting or distribution platform services themselves today

5. Regulatory consistency with existing OTT ecosystem

- News broadcasters:
 - Stream live feeds on:
 - Apps
 - Websites
 - YouTube, Facebook and other social media platforms

- TV content:
 - Uploaded as on-demand on OTT, YouTube, Facebook and other social media platforms

If the same content is streamed linearly instead of on-demand, it shall not change the regulatory classification

6. ALTD aligns with national policy objectives

ALTD/FAST ecosystem supports:

- Digital India
- Creator Economy
- MSME growth
- Level playing field

It enables:

- Low-cost content distribution
- Entry for Indian startups (e.g., RunnTV, Swift TV, NeoTV+)
- Competition against global OEM-controlled ecosystems such as LG, Samsung, Xiaomi and more.

Over-regulation would:

- Increase entry barriers
- Reduce domestic innovation
- Strengthen large global incumbents

7. Need for clear category definition (not forced mapping to DPO)

ALTD should be defined as:

A sub-category of OTT/streaming services where content is primarily presented in a linear/scheduled format, including both digital-only channels and licensed TV channels.

To maintain clarity and avoid regulatory arbitrage:

- ALTD platforms may include:
 - Digital-only FAST channels
 - Licensed TV channels
- To preserve differentiation from traditional broadcasting:
 - A threshold may be considered, such as:
 - Majority (e.g., 51%) of channels on ALTD being digital-only channels

This ensures:

- ALTD remains digital-first
- Not a proxy for unregulated rebroadcasting

ALTD/FAST services are not broadcasting systems, but evolved OTT streaming platforms with a different content presentation layer.

The definition of FAST services as presented by the MSO association is narrow and factually incomplete, as it equates FAST primarily with linear television channels. In practice, particularly in the Indian context, a significant majority of FAST channels are digital-first, VOD-to-live channels created from on-demand content libraries, and not traditional licensed TV channels. Industry trends indicate that less than 30% of channels on FAST platforms comprise conventional TV channels—predominantly news—while the remaining majority are digital-only channels. Therefore, defining FAST solely in terms of television channels misrepresents the nature of the ecosystem and risks incorrectly classifying ALTD services within the traditional broadcasting framework.

It is also pertinent to note that ALTD/FAST services are now widely prevalent across global markets, including the United States, Europe, and other advanced digital economies. In these jurisdictions, FAST platforms are consistently treated as internet-based streaming or OTT services, and not as traditional broadcasting or distribution platform services (DPOs). Aligning the Indian regulatory approach with this global precedent would ensure policy consistency, support innovation, and enable Indian platforms to remain competitive in the international digital ecosystem.

Regulation should therefore:

- Recognise ALTD as:
 - Digital, OTT-based services
- Avoid classification as:
 - DPO / broadcast distribution services
- Ensure:
 - Innovation-friendly
 - Technology-neutral
 - Future-ready framework
 - Low entry barriers for startups/MSMEs

[End of Response to Q1](#)

2. The ‘ALTD Services’ ecosystem involves multiple entities, including application providers, television equipment manufacturers, operating system providers, broadcasters, content 33 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.

RunnTV’s Response

Position Summary

While the Application Provider plays an important role in consumer access and interface, ALTD/FAST services should continue to be treated as OTT/streaming services. Accordingly, the regulatory approach should follow existing OTT frameworks (including the Digital Media Ethics Code), with a clearly defined shared-responsibility model across stakeholders.

A. Whether Application Provider should be the primary stakeholder

RunnTV Position: Application Provider should not be the sole primary stakeholder

Designating the Application Provider as the single responsible entity for authorisation and full compliance would:

- Misrepresent the multi-layered nature of the ALTD ecosystem
- Create inefficiencies and significant duplication of compliance efforts
- Impose obligations on entities without editorial or programming control

B. Recommended Approach: Shared Responsibility Model

Given the distributed nature of ALTD services (as also acknowledged in the consultation paper), responsibility should be allocated based on functional control:

1. Content Responsibility – Channel Owner / Content Provider

The channel owner should be responsible for:

- Content creation and programming
- Scheduling and editorial decisions
- Compliance with:
 - Programme Code and applicable laws
 - Certifications, S&P edits, and rights
 - Digital Media Ethics Code

Rationale:

- Channel owners have full control over content and scheduling
- The same channel is typically distributed across multiple ALTD platforms

If responsibility is placed on Application Providers:

- The same channel will undergo compliance checks by multiple platforms
- This will lead to:
 - Significant duplication of effort
 - Conflicting compliance inputs
 - Higher operational costs
 - Inefficiency across the ecosystem

This approach is neither practical nor scalable in a multi-platform digital environment.

2. Advertising Responsibility – Application Provider

The Application Provider should be responsible for:

- Ad serving and monetisation
- Compliance with:
 - Advertising Code
 - Misleading advertisement guidelines

Rationale:

- Advertisements are inserted and controlled at the platform level
- They are not part of the original channel feed in most cases

3. Platform-Level Compliance – Application Provider

Application Providers should be responsible for:

- Display of content ratings and descriptors
- Implementation of the three-tier grievance redressal mechanism
- App-level policies and disclosures

This is aligned with the existing OTT regulatory framework under the Digital Media Ethics Code.

4. Channel Onboarding Guidelines – Application Provider (Limited Scope)

Application Providers may follow category-specific onboarding norms:

- **News / Current Affairs:**
 - Only channels with valid MIB licence or downlinking permission should be permitted
- **Other genres (movies, music, entertainment, infotainment, etc.):**
 - No additional licensing requirement
 - Channel owners should ensure compliance with applicable content norms

This approach ensures regulatory safeguards in sensitive categories while preserving flexibility and innovation in other content categories.

C. On Authorisation Requirement

RunnTV Position: No separate authorisation or licensing required

ALTD/FAST services should:

- Be governed under existing OTT and digital media frameworks
- Not be subject to:
 - Licensing requirements
 - Entry barriers
 - Net worth thresholds
 - Heavy compliance obligations

D. Ecosystem Impact Considerations

Imposing heavy authorisation requirements or centralised liability on Application Providers would have the following consequences:

1. Impact on Startups and MSMEs

- Increased entry barriers
- Capital diverted from innovation to compliance
- Disadvantage for Indian companies relative to large global incumbents

2. Reduced Innovation and Competition

- Fewer new entrants
- Slower product and business model innovation
- Limited consumer choices

3. Market Imbalance in Favour of Large Players

- Benefits large broadcasters, DTH operators, and global OEM-led platforms

- Disadvantages emerging Indian platforms such as RunnTV, Swift TV etc.

4. Slowing Down Digital Transition

- As traditional cable and DTH decline, ALTD/FAST serves as a natural evolution
- Over-regulation may push audiences toward unregulated global platforms such as social media and to pirated sources of such content/channels.
- This may reduce engagement with structured video ecosystems

5. Global Benchmarking

Globally, FAST/ALTD ecosystems have evolved under light-touch regulatory environments, enabling the growth of platforms, that started as a small startup, such as:

- Pluto TV
- Tubi
- Xumo

These platforms scaled successfully due to the absence of heavy licensing or entry barriers. A similar enabling framework is important for India to develop globally competitive digital media platforms.

Conclusion

The ALTD ecosystem is inherently distributed and should be governed through a function-based shared responsibility model rather than a centralised regulatory burden on Application Providers.

The regulatory framework should:

- Align with existing OTT and digital media frameworks
- Avoid licensing-based control structures
- Enable innovation, scalability, and global competitiveness

[End of Response to Q2](#)

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 covering, though not limited to, the following conditions:

- **Service Area**
- **Validity Period**
- **Eligibility Conditions**
- **Minimum Net worth**
- **Processing Fee**
- **Entry Fee**
- **Bank Guarantee**
- **Authorisation Fee**
- **Security Deposit**
- **Roll Out Obligations**
- **Any other terms and conditions**

Further, what terms and conditions/obligations should be put in place for foreign entities providing 'ALTD Services' in India?

RunnTV's Response

Position Summary

ALTD/FAST services should not be brought under a licensing or authorisation framework applicable to "Television Channel Distribution Services" (such as DTH, HITS, IPTV), as these services are fundamentally application-based OTT/streaming services operating over the open internet.

Accordingly:

- No separate authorisation or licensing framework should be introduced
- ALTD services should be governed under:
 - Existing OTT/digital frameworks
 - Digital Media Ethics Code and applicable IT Rules

A. Fundamental Rationale Against Licensing Framework

1. Structural Difference from DPOs

The proposed authorisation framework is designed for:

- Infrastructure-heavy services
- Spectrum-dependent or managed network-based distribution
- Guaranteed delivery systems

ALTD services:

- Operate over the open internet
- Are application-layer services
- Do not control network infrastructure or last-mile delivery
- Are non-exclusive and user-driven

Applying DPO-style authorisation is therefore structurally misaligned.

2. ALTD is an Extension of OTT Ecosystem

ALTD services are:

- OTT streaming platforms
- Differing only in content presentation (linear vs on-demand)

OTT platforms today:

- Operate without licensing requirements
- Are governed under the Digital Media Ethics Code

Introducing licensing only for ALTD would create:

- Regulatory inconsistency
- Unequal treatment within the same category of services

3. Existing OTT Ecosystem Operates Without Licensing

The current digital video ecosystem demonstrates that:

- Large and small players
- Global and regional platforms

operate together without licensing requirements, leading to ecosystem growth.

Examples include:

- From Netflix to Stage
- From Prime Video to Aha
- From JioHotstar to Hoichoi

Introducing licensing for ALTD would disrupt such a balance, uniformity and level playing field for ALTF/FAST apps that belong to the same category.

4. Regulatory Consistency Across Digital Platforms

If licensing requirements are imposed on ALTD services, it raises fundamental questions:

- Will similar licensing apply to:
 - YouTube
 - Facebook
 - Content creators' own apps and websites
 - Broadcasters' own digital platforms

These platforms also stream linear and live content over the internet. Selective regulation of ALTD would therefore create regulatory inconsistency and competitive distortion.

5. Risk of Strengthening Global Incumbents

Global incumbents such as:

- Google (YouTube)
- Meta (Facebook/Instagram)
- Large global streaming platforms

have the resources to comply with any level of licensing, capital, and regulatory requirements.

Imposing such requirements would:

- Make them the default beneficiaries of the regulatory framework
- Allow them to dominate the ALTD/FAST ecosystem

At the same time, Indian players would face disproportionate compliance and financial burdens.

6. Impact on Startups, MSMEs and Innovation

Imposition of:

- Licensing requirements
- Capital thresholds
- Regulatory overhead

would:

- Create significant entry barriers
- Discourage startups and MSMEs
- Limit participation of innovative Indian companies

This would reduce competition, slow innovation, and limit consumer choice.

7. Risk to India's Digital Media Leadership

Heavy regulation at this stage would:

- Slow down India's digital media ecosystem
- Reduce domestic participation
- Shift consumption toward global platforms

This may result in long-term dominance of global companies such as:

- Google
- Meta
- Netflix

instead of enabling Indian platforms to scale.

8. Impact on Indigenous Innovation

Indian platforms such as RunnTV are:

- Not only distributing content
- But also building technology and infrastructure solutions (e.g., FAST enablement platforms)

These innovations:

- Serve domestic and international markets
- Contribute to India's digital technology ecosystem

Heavy regulatory requirements would inhibit such innovation and reduce global competitiveness.

9. Existing Cost Burden on ALTD/FAST Platforms

ALTD/FAST platforms already incur significant and ongoing operational costs, including:

- Content Delivery Network (CDN) costs, which are incurred for every minute of content streamed
- Server-Side Ad Insertion (SSAI) costs, which are incurred for every advertisement inserted

These costs are:

- Directly proportional to scale and usage
- Continuous and recurring in nature

Given that the ALTD/FAST ecosystem is:

- Still in a nascent but rapidly growing stage

These infrastructure costs are currently being absorbed as investment toward ecosystem development.

Imposing additional financial burdens such as:

- Licensing fees
- Entry costs
- Bank guarantees
- Compliance-related overheads

would:

- Make the business model non-viable except for players with very deep financial resources
- Significantly disadvantage startups and emerging platforms

This would result in:

- Reduced competition
- Lower innovation
- Limited consumer value creation
- Reduced likelihood of building globally competitive “from India to world” platforms

10. Global Regulatory Alignment

Globally, FAST/ALTD services are treated as OTT/streaming services and operate under light-touch regulatory frameworks without licensing or entry barriers. This approach has enabled the emergence and scaling of major platforms such as Pluto TV, Tubi, and Xumo.

It is important to note that if markets such as the United States had imposed regulatory requirements on ALTD/FAST services similar to those applicable to broadcasters and DPOs, platforms like Pluto TV, Tubi, and Xumo would likely not have emerged or scaled successfully. The sector would have faced:

- Limited innovation and slower product evolution
- Reduced consumer choice and diversity of content
- Higher barriers to entry for new and independent players
- Increased risk of monopolistic or duopolistic dominance by large incumbents such as telecom and distribution operators (e.g., AT&T, Comcast)

The success of the FAST ecosystem globally has been driven by a permissive and innovation-friendly regulatory environment. A similar approach is essential for India to:

- Foster competition and innovation
- Enable new entrants, including startups and MSMEs
- Build globally competitive platforms originating from India

B. Response to Proposed Authorisation Conditions (A–J)

In light of the above, the following conditions should not be applied to ALTD services:

1. Service Area

- Internet-based services are inherently borderless
- Service area definitions are not meaningful

2. Validity Period

- Relevant only for licensed infrastructure services
- Not applicable to application-based platforms

3. Eligibility Conditions

- Would create artificial barriers
- Restrict innovation

4. Minimum Net Worth

- Not relevant for technology-driven services
- Would exclude startups and MSMEs

5. Processing Fee

- Not applicable without licensing
- Any minimal registration (if considered) should be nominal

6. Entry Fee

- Would increase entry barriers
- Discourage ecosystem growth

7. Bank Guarantee

- Not applicable to application-layer services

8. Authorisation Fee

- Creates recurring burden without justification
- Not applicable to OTT services

9. Security Deposit

- No rationale in this context

10. Roll-Out Obligations

- Applicable only to infrastructure deployment
- Not relevant to internet-based services

11. Any Other Terms and Conditions

- Should be limited to existing OTT/digital compliance requirements

C. Suggested Regulatory Approach (Alternative)

A more appropriate framework would be:

- Governance under:
 - Digital Media Ethics Code
- Platform-level compliance:
 - Grievance redressal
 - Content ratings and disclosures
- Content responsibility:
 - With channel/content owners

This ensures regulatory clarity while enabling growth.

D. Foreign Entities Providing ALTD Services

To ensure a level playing field:

- ALTD services should operate through an Indian incorporated entity
- A foreign direct investment (FDI) limit of up to 74% may be considered

This ensures:

- Local accountability
- Fair competition

Conclusion

ALTD/FAST services should be treated as OTT/streaming services and not as broadcast distribution platforms.

Imposing a licensing framework would:

- Be structurally inappropriate
- Create disproportionate financial and operational burdens
- Limit innovation and competition

A light-touch, OTT-aligned regulatory approach is essential to:

- Support Indian startups and MSMEs
- Enable technological innovation
- Build globally competitive Indian platforms

[End of Response to Q3](#)

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:

- **Renewal of Authorisation**
- **Renewal Fee**
- **Equity Holding and Management Control**
- **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**
- **Transfer/Surrender of Service Authorisation**
- **Sharing of Infrastructure g. Any other terms and conditions**

RunnTV’s Response

Position Summary

The common terms and conditions proposed under Part-I of Annexure-III of the Authorisation Recommendations (such as renewal, fees, equity restrictions, cross-holding limitations, transfer conditions, and infrastructure sharing) are not applicable to ALTD/FAST services, as **these services are fundamentally application-based OTT/streaming services operating over the open internet**, and not broadcast distribution platforms.

Accordingly:

- No such conditions should be imposed on ALTD/FAST services
- ALTD should continue to be governed under:
 - Existing OTT/digital frameworks
 - Digital Media Ethics Code and applicable IT Rules

A. Fundamental Rationale

1. ALTD is an Application-Based OTT Service, Not Broadcasting

ALTD/FAST services are:

- Delivered via applications over the open internet
- Not dependent on:
 - Spectrum
 - Satellite transmission
 - Cable networks
 - Managed distribution infrastructure

A majority of ALTD/FAST channels (typically more than 70%) are:

- Digital-only channels
- Created from on-demand content libraries
- Content that is already available on platforms such as YouTube and other OTT services

The only distinguishing factor is:

- The presentation format (linear/scheduled instead of on-demand)

This raises a fundamental question:

Does presenting content in a linear format convert an internet-based streaming service into broadcasting?

The answer is clearly no.

If linearity alone were to define broadcasting, then:

- Live streaming on OTT platforms
- Live events on YouTube
- Scheduled content streams on apps and websites

would all need to be classified as broadcasting services, which is not the case under current regulatory frameworks.

2. Structural Difference from DPOs

The proposed authorisation framework is designed for:

- Infrastructure-heavy services
- Spectrum-dependent or managed networks
- Guaranteed delivery systems

ALTD services:

- Operate purely over the open internet
- Are application-layer services
- Do not control or own transmission infrastructure

Therefore, applying DPO-style conditions is structurally inappropriate.

3. ALTD is an Extension of OTT Ecosystem

ALTD platforms function similarly to existing OTT platforms such as:

- Netflix
- Prime Video
- JioHotstar
- Zee5
- SonyLIV
- Aha
- Stage
- Waves

All of these:

- Operate over open internet
- Are application-driven
- Deliver video content to users

ALTD differs only in content discovery and presentation format, not in its underlying nature.

4. Nascent Ecosystem with Existing Challenges

ALTD/FAST is still in a nascent stage in India and is currently facing:

- Low CPMs
- Limited advertising budgets
- Low ad fill rates

Despite these constraints, platforms are:

- Investing significantly
- Building the ecosystem
- Creating a viable open internet video advertising market

Imposing additional regulatory burdens at this stage would:

- Disrupt ecosystem growth
- Reduce participation
- Delay maturity

5. Existing Cost Burden on ALTD/FAST Platforms

ALTD platforms already incur significant operational costs, including:

- Content Delivery Network (CDN) costs for every minute streamed
- Server-Side Ad Insertion (SSAI) costs for every advertisement served

These are:

- Recurring
- Directly linked to usage and scale
- Already substantial for platforms operating at scale

At the current stage, these costs are being absorbed as:

- Investment toward ecosystem development

Any additional regulatory costs would:

- Make business models unviable for most players
- Restrict participation to only very large entities

6. Risk of Strengthening Global Walled Gardens

If ALTD ecosystem growth is constrained:

- Declining TV ad revenues will not shift to ALTD
- Instead, they will flow to global platforms such as:
 - Google
 - Meta

This would:

- Reduce India's share in digital value creation
- Increase dependence on foreign-controlled ecosystems

7. Impact on Innovation, Startups and MSMEs

ALTD/FAST enables:

- Startup-led innovation
- MSME participation
- New content and distribution models

Imposing broadcast-style conditions would:

- Create high entry barriers
- Reduce competition

- Limit innovation
- Restrict user choice

8. Supporting India-to-World Platforms

Indian ALTD platforms such as RunnTV are:

- Attracting FDI into India
- Expanding globally (including upcoming launches in new market in 2026)
- Enabling export of Indian content

They also facilitate:

- Entry of global ecosystems into India
- Two-way flow of value and innovation

Heavy regulatory conditions would:

- **Make such expansion and innovation infeasible**
- **Reduce India's ability to build global platforms**

9. Global Regulatory Alignment

Globally, FAST/ALTD services:

- Are treated as OTT/streaming services
- Operate under light-touch regulatory frameworks

If markets like the United States had imposed broadcast-style licensing:

- Platforms such as Pluto TV, Tubi, and Xumo would likely not have emerged
- The ecosystem would have faced:
 - Limited innovation
 - Reduced consumer choice
 - Dominance by large telecom/distribution incumbents

A similar enabling approach is required for India.

B. Response to Specific Conditions

Given the above, the following conditions are not applicable:

1. Renewal of Authorisation / Renewal Fee

- Not applicable as licensing itself is not required

2. Equity Holding and Management Control

- No justification in application-based services
- Would restrict investment and growth

3. Cross-Holding Restrictions (Broadcasters ↔ ALTD Providers)

- Would limit collaboration and innovation
- Not aligned with OTT ecosystem practices

4. Cross-Holding Restrictions (ALTD ↔ DSPs)

- Not relevant due to fundamentally different service models

5. Transfer / Surrender of Authorisation

- Not applicable in absence of licensing

6. Sharing of Infrastructure

- Not relevant as ALTD uses shared cloud-based infrastructure

7. Any Other Conditions

- Should be limited to existing OTT/digital compliance frameworks

C. Foreign Entities and FDI Considerations

- ALTD services should operate through an Indian incorporated entity
- An FDI limit of up to 74% may be considered

This ensures:

- Local accountability
- Value creation within India
- Balanced competition

Conclusion

ALTD/FAST services are fundamentally OTT/streaming services delivered over open internet, with linear presentation as a discovery layer—not a defining characteristic of broadcasting.

Imposing broadcast-style conditions would:

- Be structurally inappropriate
- Increase financial and compliance burdens
- Limit innovation and participation
- Shift value to global platforms

A light-touch, OTT-aligned approach is essential to:

- Support startups and MSMEs
- Enable innovation
- Build globally competitive Indian platforms
- Ensure value creation remains within India

[End of Response to Q4](#)

5. What should be the specific terms and conditions applicable 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:

- **Reservation of operational channel capacity by Vertically Integrated Entity**
- **Platform Services (PS) offered by application providers provisioning ALTD services**
- **Monitoring and Inspection of facilities**
- **Supply of Information to Central Government/TRAI**
- **Contravention of terms and conditions of authorisation**
- **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 made applicable 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.

RunnTV's Response

Position Summary

The specific terms and conditions proposed under Part-II of Annexure-III of the Authorisation Recommendations (including operational capacity reservation, platform services restrictions, monitoring, reporting obligations, and mandatory carriage requirements) are not applicable and should not be considered in the context of ALTD/FAST services.

ALTD/FAST services are fundamentally application-based OTT/streaming services delivered over the open internet, and not infrastructure-led broadcast distribution platforms (DPOs).

ALTD/FAST is not a DPO-like business, and regulating it as one would risk undermining and potentially stifling the category itself.

A. Fundamental Rationale

1. Structural Misalignment with DPO Framework

The obligations proposed under Part-II are designed for:

- Infrastructure-based services (DTH, HITS, IPTV)
- Spectrum or network-dependent delivery systems
- Controlled and capacity-constrained distribution environments

In contrast, ALTD/FAST services:

- Operate over the open internet
- Are application-layer services
- Do not rely on:
 - Spectrum
 - Satellite transmission
 - Cable or managed networks
- Have no inherent capacity constraints

Therefore, applying such obligations to ALTD services represents a category mismatch.

2. ALTD is an OTT/Streaming Model with Linear Presentation

- Majority of ALTD/FAST channels (typically more than 70%) are:
 - Digital-only channels
 - Derived from on-demand content libraries
 - Content already available on platforms such as YouTube and OTT services
- The only difference is:
 - Linear/scheduled presentation

This does not transform ALTD into broadcasting. It remains a streaming service over open internet, similar to platforms such as:

- Waves
- Netflix
- Prime Video
- JioHotstar
- Zee5
- SonyLIV
- Aha
- Stage

3. Risk of Stifling a Nascent Ecosystem

ALTD/FAST in India is:

- Still in an early stage
- Facing challenges such as:

- Low CPMs
- Limited ad budgets
- Low fill rates
- High infrastructure costs (CDN and SSAI)

Imposing DPO-style obligations would:

- Increase compliance burden
- Reduce viability for most players
- Restrict participation to only large, well-capitalised entities

This would:

- Limit competition
- Reduce innovation
- Constrain consumer choice

B. Clause-wise Response

a. Reservation of Operational Channel Capacity by Vertically Integrated Entity

- Not applicable to ALTD services

ALTD platforms:

- Do not operate under capacity constraints
- Are not limited by spectrum or bandwidth allocation

Imposing such requirements is unnecessary and irrelevant in an internet-based environment.

b. Platform Services (PS) offered by Application Providers

- Not applicable and should not be imposed

In ALTD/FAST:

- Platform-created channels (digital-only channels, VOD-to-live channels) are core to the business model
- Restricting such services would directly undermine the FAST ecosystem

c. Monitoring and Inspection of Facilities

- Not applicable

ALTD services:

- Do not operate physical broadcast infrastructure
- Are governed by existing digital frameworks

Compliance can be ensured through:

- Existing IT Rules
- Digital Media Ethics Code

d. Supply of Information to Central Government/TRAI

- May be limited to minimal, OTT-aligned disclosures

Heavy or infrastructure-style reporting requirements should not be imposed.

e. Contravention of Terms and Conditions

- Should be governed under:
 - Existing IT Act
 - Digital Media Ethics Code

No separate or additional penalty framework is required.

f. Any Other Terms and Conditions

- No additional DPO-style conditions should be introduced

Regulatory approach should remain consistent with OTT platforms.

C. Mandatory Sharing of Sports Broadcasting Signals and Compulsory Channel Carriage

RunnTV Position: Not applicable and should not be imposed

1. Structural Incompatibility

These obligations are designed for:

- Licensed broadcast distribution platforms
- Controlled network environments

ALTD services:

- Operate over open internet
- Do not control distribution infrastructure

2. No Global Precedent

OTT and streaming platforms globally:

- Are not subject to:

- Mandatory sports signal sharing
- Compulsory channel carriage

Applying such obligations selectively to ALTD would create regulatory inconsistency.

3. Violation of Commercial and Content Rights

- Sports broadcasting rights are:
 - Contractual
 - Exclusive
 - Commercially negotiated

Mandatory sharing would:

- Interfere with contractual rights
- Create legal and commercial conflicts

4. Business Model Impact

ALTD/FAST operates on:

- Ad-supported model
- Low-margin economics

Mandatory carriage or sharing obligations would:

- Increase costs without corresponding revenue
- Make business models unviable for most players

5. Risk of Ecosystem Distortion

Such obligations would:

- Favour large incumbents with financial capacity
- Disadvantage startups and MSMEs
- Reduce innovation and competition

Conclusion

The obligations proposed under Part-II of Annexure-III are not applicable and should not be considered for ALTD/FAST services.

ALTD/FAST is:

- A digital, application-based streaming model
- Fundamentally different from broadcast distribution platforms

Regulating ALTD/FAST as a DPO-like business would risk stifling the category at an early stage of its development.

A regulatory approach aligned with:

- OTT frameworks
- Digital Media Ethics Code

is essential to:

- Support innovation and startups
- Enable growth of open internet advertising ecosystem
- Prevent excessive concentration of market power with global incumbents
- Build globally competitive Indian platforms

[End of Response to Q5](#)

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.**

RunnTV's Response

Position Summary

No separate assurance or certification mechanism should be prescribed requiring television manufacturers or operating system providers to verify whether applications provisioning ALTD services are authorised by MIB.

Such a requirement would effectively create a prior approval regime for digital applications, which is inconsistent with India's OTT framework and would introduce unnecessary gatekeeping in a competitive digital ecosystem.

ALTD/FAST services should continue to be treated in line with OTT/streaming platforms, where:

- No prior authorisation is required
- Compliance is ensured through:
 - Existing laws
 - Digital Media Ethics Code
 - IT Rules

A. Fundamental Rationale

1. ALTD Services Are OTT/Streaming Applications

ALTD/FAST services:

- Are application-based services delivered over open internet
- Do not rely on:
 - Spectrum
 - Satellite
 - Cable infrastructure

They are therefore comparable to OTT platforms such as:

- Netflix
- Prime Video
- YouTube
- JioHotstar

- Zee5
- SonyLIV

None of these platforms are subject to:

- MIB authorisation requirements
- OEM/OS-level certification before distribution

Introducing such a requirement only for ALTD would result in:

- Regulatory inconsistency
- Unequal treatment within the same category of digital services

2. OEM/OS Gatekeeping Would Distort Market Competition

Television manufacturers and operating system providers:

- Are technology and distribution platforms
- Are not regulatory authorities

It is also important to note that:

- **Many OEMs and TV operating systems already operate their own ALTD/FAST applications**

In such a scenario, introducing an approval or certification requirement would:

- Provide OEMs/OS providers with undue leverage over competing third-party ALTD applications
- Create:
 - Delays in onboarding
 - Potential denial or restriction of access
- Lead to:
 - Preferential treatment of their own applications
 - Anti-competitive outcomes

This would:

- Disadvantage independent Indian platforms
- Concentrate control within a few large, often foreign-controlled ecosystems

3. Risk of Foreign-Controlled Gatekeeping

Major OEMs and OS platforms:

- Are largely controlled by global companies

Granting them a role in:

- Certifying or approving ALTD applications

would effectively:

- Transfer market control to foreign-controlled entities
- Limit the ability of Indian startups and MSMEs to compete

This would be contrary to:

- Digital India objectives
- Promotion of domestic innovation and competition

4. No Precedent in OTT Ecosystem

No such certification or approval mechanism exists for:

- Google Play Store
- Apple App Store
- Smart TV app ecosystems

Applications such as:

- YouTube
- Instagram
- OTT streaming platforms

are not subject to prior authorisation verification before being made available to users.

Introducing such a requirement selectively for ALTD would:

- Create regulatory inconsistency
- Distort platform neutrality

5. Existing Framework Is Sufficient

Compliance for ALTD/FAST services can be adequately ensured through:

- Information Technology Act
- Digital Media Ethics Code
- Applicable content and advertising regulations

No additional certification layer is required.

B. Recommended Approach

Instead of introducing an authorisation-based certification mechanism:

1. Continue with Existing OTT Model

- No prior approval requirement
- Open and non-discriminatory access to platforms

2. Self-Declaration by Application Providers

- Application providers may:
 - Provide self-declaration of compliance with applicable laws

3. Limited Role for OEMs/OS Providers

OEMs/OS platforms may:

- Ensure:
 - Applications are from identifiable developers
 - No malicious or illegal applications are hosted

However, they should not be required to:

- Verify regulatory authorisation
- Conduct content-level compliance checks
- Act as regulatory gatekeepers

C. Indian Entity Requirement (Suggested Safeguard)

To ensure accountability and promote domestic ecosystem growth:

- ALTD applications operating in India should:
 - Belong to an Indian incorporated entity
- A foreign ownership cap of up to 74% may be considered

This would:

- Ensure local accountability
- Promote value creation within India
- Enable FDI inflow while maintaining strategic control

Conclusion

The introduction of an OEM/OS-based certification or authorisation verification mechanism for ALTD applications would:

- Be inconsistent with the OTT regulatory framework
- Create unnecessary gatekeeping
- Distort competition
- Disadvantage Indian startups and MSMEs
- Concentrate control with large global OEM and platform players

Such a requirement would effectively act as a prior approval regime for digital applications and should not be introduced.

A light-touch approach aligned with existing OTT frameworks, combined with self-regulation and existing legal provisions, is sufficient to ensure compliance while enabling innovation and competition in the ALTD/FAST ecosystem.

End of Response to Q6

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/permitted by MIB for distribution in India. What kind of penalty/disincentive/deterrent be instituted for noncompliance? Provide your comments with justification.

RunnTV's Response

Position Summary

The assurance mechanism for channels on ALTD/FAST platforms should be based on a differentiated approach, recognising the fundamental distinction between:

- Licensed television channels
- Digital-only FAST channels

A uniform requirement mandating MIB authorisation for all channels is not appropriate, as a majority (70%+) of channels on ALTD platforms are digital-only channels that do not fall within the scope of traditional broadcasting regulation.

A. Fundamental Distinction Between Channel Types

1. Licensed Television Channels

- These are:
 - Traditional broadcast channels
 - Already governed by MIB uplinking/downlinking guidelines
- It is also important to note that:
 - The majority of TV channels available on ALTD platforms are news channels, which:
 - Already possess valid MIB licences
 - Are compliant with applicable regulatory requirements

Proposed Requirement:

- All television channels (across all categories) must:
 - Have valid MIB permission/downlinking licence
- ALTD platforms should:
 - Undertake reasonable due diligence to verify such authorisation

2. Digital-Only FAST Channels (Majority of Channels)

- Typically constitute 70%+ of channels on ALTD platforms
- Are:
 - Created from existing content libraries
 - Content already available on:

- OTT platforms
 - YouTube
- These channels:
 - Do not use:
 - Spectrum
 - Satellite
 - Cable distribution
 - Are not “television channels” in regulatory sense

Therefore, MIB licensing requirements should not be extended to such digital-only channels (except in specific sensitive categories as noted below).

3. Special Category: News and Current Affairs

Given the regulatory sensitivity of this category:

- For News / Current Affairs channels:
 - MIB licence/downlinking permission should be mandatory
 - Applicable to:
 - TV channels
 - Digital-only channels

This ensures:

- Regulatory oversight where necessary
- Consistency with existing policy framework

B. Content Compliance Framework

1. Applicability of Digital Media Ethics Code

Digital-only channels should comply with:

- Digital Media Ethics Code, 2021
- Applicable OTT/content regulations

2. Responsibility for Content Compliance

Content compliance responsibility should lie with:

Channel Owner / Content Provider

Rationale:

- Channel owner:
 - Originates content
 - Controls programming
 - Determines scheduling

- Exercises editorial control
- ALTD platform:
 - Does not control content creation or scheduling

Placing responsibility on platforms would:

- Lead to significant duplication of compliance across multiple platforms
- Create inefficiencies and inconsistencies
- Increase operational burden without control

3. Declaration-Based Mechanism

A practical approach would be:

- All channel owners to submit:
 - Standardised declaration (as prescribed by MIB/TRAI)
- Declaration to confirm:
 - Compliance with:
 - Digital Media Ethics Code
 - Applicable laws and guidelines

4. Prohibited Content Categories

ALTD platforms may be required to ensure that certain categories are not permitted, such as:

- Pornographic content
- Illegal betting/gambling content
- News and Opinion channels without MIB licences

This ensures baseline safeguards without over-regulation.

C. Role of ALTD Platforms (Due Diligence Framework)

ALTD platforms should:

- Undertake reasonable due diligence, including:
 - Verification of:
 - MIB licence (where applicable)
 - Declaration from channel owner

However, platforms should not be required to:

- Conduct detailed content-level compliance audits
- Act as regulatory authorities
- Assume editorial liability

D. Enforcement Mechanism for Non-Compliance

A graded and proportionate enforcement framework is recommended, applicable to both:

- Channel owners
- ALTD platforms (limited to their scope of responsibility)

Three-Tier Framework

1. Level 1 – Warning

- Issued upon:
 - Minor or first-time violation

2. Level 2 – Takedown

- Temporary or permanent removal of channel/content
- Applicable in:
 - Repeated or serious violations

3. Level 3 – Penalties / Disincentives

- Financial or regulatory penalties
- Applicable in:
 - Persistent or intentional non-compliance

Additional Safeguard

- In cases of serious violations:
 - Channel may be:
 - Barred from distribution across ALTD platforms

E. Key Principles for Penalty Framework

- Penalties should be:
 - Proportionate and risk-based
- Responsibility should align with:
 - Control and ownership of content
- Platforms should not be penalised for:
 - Content over which they have no editorial control

Conclusion

An effective assurance mechanism for ALTD services should:

- Recognise the distinction between:
 - Licensed TV channels
 - Digital-only FAST channels
- Apply MIB licensing requirements only where relevant

- Ensure content compliance through:
 - Channel owner responsibility
 - Declaration-based mechanisms
- Avoid overburdening application providers with:
 - Editorial or regulatory responsibilities

A balanced, differentiated, and OTT-aligned approach is essential to ensure compliance without stifling innovation in the ALTD/FAST ecosystem.

End of Response to Q7

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.

RunnTV's Response

Position Summary

There is no need to prescribe any separate or additional terms and conditions for value-added services (VAS) offered by ALTD/FAST service providers.

Value-added services in ALTD are integral product features of OTT/streaming platforms and are already adequately governed under existing legal and regulatory frameworks.

Introducing separate regulations for such services would:

- Be unnecessary
- Create regulatory duplication
- Risk stifling innovation in a nascent ecosystem

A. Nature of Value-Added Services in ALTD

VAS in ALTD/FAST platforms are fundamentally:

- Application-level features
- Designed to enhance:
 - User experience
 - Content discovery
 - Monetisation efficiency

Examples include:

- Personalised recommendations
- Curated or personalised linear channels
- Targeted and programmatic advertising
- Interactive ad formats (e.g., clickable or shoppable ads)
- User interface enhancements and content discovery tools

These are not standalone services but core functionalities of modern OTT/streaming platforms

B. VAS in ALTD vs VAS in DPOs / Telecom Services

It is important to distinguish between:

1. VAS in DPOs / Telecom Services (Require Regulation)

VAS in DTH, cable, or telecom networks typically involve:

- Network-dependent services
- Infrastructure-linked features
- Potential consumer protection implications

Examples include:

- Caller tunes / ringback tones (telcos)
- Premium SMS / subscription-based services
- Pay-per-view channels or bouquets (DTH)
- Gaming or interactive services tied to network billing
- Conditional access services linked to hardware and encryption

These services:

- Often involve direct billing to consumers
- May require:
 - Pricing transparency
 - Consent mechanisms
 - Consumer protection safeguards

2. VAS in ALTD/FAST (Do Not Require Separate Regulation)

In contrast, VAS in ALTD:

- Are:
 - Non-infrastructure based
 - App-layer features
- Do not:
 - Involve telecom billing systems
 - Require hardware-level control
 - Create network-level dependencies

They are:

- Embedded within the platform experience
- Non-intrusive
- Typically ad-supported or experience-enhancing

Therefore, applying DPO/telco-style VAS regulation to ALTD is not appropriate.

C. Existing Regulatory Coverage is Adequate

VAS in ALTD are already governed under:

- Information Technology Act
- Digital Media Ethics Code, 2021

- Data protection and privacy laws
- Advertising standards and guidelines

These frameworks sufficiently address:

- User safety
- Data usage
- Advertising practices

No regulatory gap exists that necessitates additional conditions.

D. Role of VAS in Ecosystem Development

VAS plays a critical role in:

1. Improving Monetisation

Given current challenges in ALTD ecosystem:

- Low CPMs
- Low ad fill rates
- Limited advertiser awareness

VAS such as:

- Targeted advertising
- Programmatic monetisation
- Interactive ad formats

are essential to:

- Improve yield
- Attract advertisers
- Build sustainable business models

2. Driving Innovation

VAS is a key area where:

- Indian startups and MSMEs innovate
- Platforms differentiate themselves

Restricting or over-regulating VAS would:

- Limit product innovation
- Reduce competitiveness with global platforms

3. Enhancing User Experience

Features such as:

- Personalised channels
- Smart recommendations
- Interactive interfaces

improve:

- Content discovery
- User engagement
- Platform stickiness

E. Risks of Over-Regulation

Introducing specific VAS regulations would:

- Regulate product design and feature innovation
- Slow down technological evolution
- Create compliance uncertainty
- Disproportionately impact smaller players

This would:

- Reduce competition
- Limit user choice
- Strengthen larger incumbents

F. Recommended Approach

- No separate VAS-specific regulation should be introduced
- ALTD platforms should:
 - Continue to comply with existing legal frameworks
- Innovation in VAS should be:
 - Encouraged
 - Market-driven

Conclusion

Value-added services in ALTD/FAST platforms are:

- Core application-level features
- Already governed under existing OTT/digital frameworks

Prescribing separate terms and conditions for such services would be unnecessary and could significantly hinder innovation in a rapidly evolving ecosystem.

A light-touch regulatory approach is essential to:

- Support innovation
- Enable monetisation
- Build globally competitive Indian streaming platforms

End of Response to Q8

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.

RunnTV's Response

Position Summary

Broadcasters/content owners providing or intending to provide channels on ALTD/FAST platforms should not be mandated to obtain satellite-based or ground-based broadcasting authorisation prior to distributing content on such platforms.

Requiring broadcast authorisation for ALTD distribution would amount to forcing every digital FAST channel to become a licensed broadcaster, which is neither appropriate nor practical in a digital, internet-based ecosystem.

A. Fundamental Rationale

1. Structural Mismatch Between Broadcasting and ALTD

Broadcasting authorisations (satellite or ground-based) are designed for:

- Spectrum-based transmission
- Satellite uplinking/downlinking
- Terrestrial broadcast infrastructure

ALTD/FAST services:

- Operate entirely over the open internet
- Do not involve:
 - Spectrum
 - Satellite transmission
 - Cable infrastructure

Therefore, applying broadcast licensing requirements to ALTD content providers is fundamentally misaligned with the nature of the service.

2. Majority of FAST Channels Are Digital-Only

- More than 70% of channels on ALTD platforms are digital-only
- These are:
 - Created from existing content libraries
 - Content already available on:
 - OTT platforms
 - YouTube
- No new broadcast signal is generated
- No uplinking/downlinking activity is involved

Mandating broadcast licences for such channels would be inappropriate and unnecessary.

3. Severe Impact on Content Ecosystem

Such a requirement would effectively mean:

Every digital FAST channel would need to become a licensed broadcaster

This raises a fundamental concern:

Should every content owner or creator be required to become a licensed broadcaster in order to distribute linear content on ALTD platforms?

This would:

- Create extremely high entry barriers
- Exclude:
 - Content library owners
 - Independent creators
 - MSMEs
- Limit distribution options for content owners who are already facing decline in traditional TV revenues

4. Impact on Creator Economy and MSMEs

The ALTD/FAST ecosystem:

- Enables:
 - Monetisation of existing content libraries
 - Entry of new digital-first creators
 - Participation by MSMEs and startups

Imposing broadcast licensing requirements would:

- Restrict creator participation
- Discourage innovation
- Reduce diversity of content

This would be contrary to:

- India's push for:
 - Creator economy
 - Digital entrepreneurship
 - Startup ecosystem growth

5. Risk of Market Concentration

Such requirements would:

- Favour:
 - Large, established broadcasters
 - Entities with significant capital and regulatory capacity
- Disadvantage:
 - Emerging Indian platforms
 - Independent content creators

This would:

- Increase dependence on:
 - Large domestic incumbents
 - Global media and technology companies

Ultimately leading to dominance of large overseas players rather than enabling Indian companies to scale.

6. Need for Agility and Innovation in Digital Ecosystem

The ALTD/FAST ecosystem requires:

- Speed
- Agility
- Continuous technological innovation

to:

- Build a strong open internet distribution ecosystem
- Compete with:
 - Global streaming platforms
 - FAST ecosystems
 - Advanced digital distribution models

Traditional broadcast and DPO frameworks:

- Are structurally different
- Operate with:
 - Heavy regulatory overhead
 - Infrastructure dependency

Such frameworks:

- May not be able to keep pace with:
 - Rapid global innovation cycles
 - Technology-driven evolution

Imposing broadcast-style licensing would slow down the ecosystem and reduce India's competitiveness in global digital media.

7. Global Regulatory Perspective

Globally:

- FAST and OTT ecosystems:
 - Do not require content providers to obtain broadcast licences
- Digital content distribution:
 - Operates under light-touch frameworks

Imposing such requirements in India would:

- Create regulatory divergence
- Reduce global competitiveness of Indian platforms

B. Balanced Approach (News and Current Affairs Exception)

As a limited exception:

- For News and Current Affairs channels:
 - Existing MIB licensing/downlinking requirements may continue to apply

This ensures:

- Appropriate regulatory oversight in sensitive categories
- Alignment with existing policy

Conclusion

Mandating broadcasting authorisation for content providers on ALTD platforms would:

- Be structurally inappropriate
- Create significant entry barriers
- Limit participation of creators and MSMEs
- Reduce innovation and content diversity
- Shift market power toward large incumbents and global players

Such a requirement would effectively force every digital FAST channel to become a licensed broadcaster, which would severely constrain the growth of the ALTD/FAST ecosystem in India.

A regulatory approach aligned with:

- OTT frameworks
- Digital Media Ethics Code

is essential to:

- Support creator economy
- Enable MSME participation
- Encourage innovation
- Build globally competitive Indian digital platforms

End of Response to Q9

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.

RunnTV's Response

Position Summary

No pricing parity should be mandated between traditional television distribution platforms (DTH, Cable, IPTV) and ALTD/FAST platforms.

Price parity between subscription-based television distribution and ad-supported ALTD/FAST services is neither economically nor structurally viable, given the fundamental differences in cost structures, business models, and consumption patterns.

A. Fundamental Structural Differences Between DPO and ALTD Ecosystems

ALTD/FAST and traditional DPO-based systems are fundamentally different across:

- Cost structures
- Distribution mechanisms
- Revenue models
- Consumption patterns
- User switching dynamics

1. Cost Structure Differences

DPO (DTH/Cable/IPTV):

- Predominantly fixed cost model
- Infrastructure-heavy:
 - Satellite
 - Cable networks
 - Set-top boxes
- Costs do not increase with incremental viewing

ALTD/FAST:

- Predominantly variable cost model
- Costs increase with every additional watch hour

Key cost drivers include:

- Content Delivery Network (CDN – Content Delivery Network) costs per minute streamed

- Streaming infrastructure/Cloud costs
- Server-Side Ad Insertion (SSAI) costs per ad served

Cost is directly proportional to consumption.

2. Consumer Cost Model Differences

DPO:

- Fixed monthly subscription fee
- Independent of viewing hours

ALTD:

- Internet/data cost per watch hour
- Consumption-linked cost

Fixed pricing cannot be applied to consumption-linked systems.

3. Revenue Model Differences

DPO:

- Subscription-driven

ALTD:

- Primarily ad-supported (AVOD)
- Requires monetisation per watch hour

4. Switching Cost Differences

DPO:

- High switching cost:
 - Installation
 - Hardware
 - Lock-ins

ALTD:

- Near-zero switching cost
- Instant install/uninstall

B. Pricing Parity is Conceptually Invalid

Two systems with fundamentally different cost structures and revenue models cannot be subjected to identical pricing frameworks.

Pricing must align with cost structure—this is not the case between DPO and ALTD.

C. Industry Evolution and Technology Transition

The media ecosystem is evolving due to:

- Digital infrastructure
- Changing consumer behaviour
- Global advancements

Restricting ALTD through price parity would hinder this evolution.

Analogous Transitions

- SMS → WhatsApp
- Telephony → Internet calling
- Postal mail → Email
- Traditional banking → Digital payments

None of these transitions required pricing parity.

D. Role of Broadcasters and Market Dynamics

Broadcasters:

- Are voluntarily distributing content on ALTD platforms
- View ALTD as:
 - Future consumption channel
 - Additional revenue stream

They should retain the freedom to:

- Choose distribution channels
- Decide pricing strategies

E. Cord-Cutting, Cord-Never and Ecosystem Retention

A critical industry trend is the rise of:

- Cord-cutters:
 - Users disconnecting traditional DTH/cable services

- Cord-nevers:
 - Users who never subscribed to traditional TV

These users:

- Will either:
 - Move to new digital services
 - Or get lost from the traditional TV ecosystem entirely

If lost:

- They will consume content only via:
 - OTT platforms
 - YouTube
 - Broadcasters' own apps
- They may never return to:
 - Linear TV ecosystem

Role of ALTD in Retention

ALTD/FAST platforms:

- Act as a bridge between traditional TV and digital consumption
- Enable:
 - Retention of these users within the TV ecosystem
 - Continued engagement with linear-style content

Without ALTD:

- Users may:
 - Shift permanently to non-linear platforms
 - Exit the TV ecosystem entirely

Role in Preventing Piracy and Non-Legitimate Consumption

For users seeking alternatives:

- ALTD provides:
 - Legitimate
 - Regulated as OTT streaming service
 - High-quality access

In absence of ALTD:

- Users may turn to:
 - Pirated sources
 - Non-legal IPTV services

ALTD thus plays a critical role in retaining users within the formal and regulated media ecosystem.

F. Consumer Benefit and Access Expansion

ALTD enables:

- Anytime, anywhere access
- Multi-device viewing

Traditional TV remains:

- Location and device restricted

G. Risk of Imposing Price Parity

Price parity would:

- Break ALTD economics
- Reduce innovation
- Limit competition

It would also:

- Accelerate shift toward global platforms (Google, Meta ecosystems)

H. ALTD as Complementary, Not Substitutive

ALTD complements traditional television and enables its evolution.

It helps:

- Monetise library content
- Expand reach
- Retain audiences

Conclusion

A complete pricing parity between ALTD and traditional television platforms:

- Is not feasible
- Is not appropriate
- Should not be mandated

Two distribution systems with entirely different infrastructure, cost structures, revenue models, and consumption patterns cannot be subjected to identical pricing frameworks.

A market-driven approach is essential to:

- Enable digital evolution
- Retain users within the ecosystem
- Support innovation
- Build a globally competitive ALTD ecosystem

End of Response to Q10

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.

RunnTV's Response

Position Summary

Consumer protection and grievance redressal obligations for ALTD/FAST services should be aligned with the existing OTT framework under the Digital Media Ethics Code, 2021, and should not replicate or extend DPO-style obligations.

Imposing DPO-style consumer protection obligations on ALTD services would be disproportionate and inappropriate, given the fundamentally different nature of these services.

A. Nature of ALTD Services and Consumer Interaction

ALTD/FAST services are:

- Application-based
- Delivered over open internet
- Accessible across:
 - Smart televisions
 - Mobile applications
 - Web platforms

Unlike DTH/cable services, ALTD:

- Does not involve:
 - Installation
 - Hardware provisioning
 - Signal delivery control
- Does not face:
 - Network-level outages under its control

Consumer interaction in ALTD is entirely digital, self-managed, and non-intrusive, requiring a different regulatory approach than traditional broadcast services.

B. Existing OTT Framework is Adequate

Consumer protection in ALTD services is already addressed under:

- Digital Media Ethics Code, 2021
- Information Technology Rules
- Applicable consumer protection and data privacy laws

These frameworks already provide:

- Structured grievance redressal
- Content-related complaint mechanisms
- Escalation pathways

No regulatory gap exists that necessitates additional or separate obligations.

C. Recommended Grievance Redressal Framework

ALTD platforms should follow a three-tier grievance redressal mechanism, consistent with OTT platforms:

1. Tier 1 – Platform-Level Grievance Redressal

- Appointment of a Grievance Officer
- In-app / web-based complaint mechanism
- Email support

Timeline:

- Acknowledgement within 24 hours
- Resolution within prescribed timelines

2. Tier 2 – Self-Regulatory Body

- Membership in an industry-led self-regulatory body
- Escalation of unresolved complaints

3. Tier 3 – Oversight Mechanism

- As per provisions of:
 - Digital Media Ethics Code
 - Government oversight framework

D. Platform-Level Consumer Protection Measures

ALTD platforms may ensure:

- Clear display of:
 - Terms of service
 - Privacy policy
- Content-related disclosures:

- Ratings
- Descriptors
- Transparent communication on:
 - Advertising practices

These measures are already standard across OTT platforms including ALTD apps.

E. Multi-Device Access Consideration

Given that ALTD services are accessed across:

- Smart TVs
- Mobile devices
- Web platforms

The consumer protection framework should be:

Platform-agnostic and application-level, rather than device-specific or infrastructure dependent

F. Consumer Empowerment in ALTD Ecosystem

ALTD inherently provides:

- High consumer control
- Zero switching cost

Users can:

- Install or uninstall applications instantly
- Switch between platforms without:
 - Financial cost
 - Hardware dependency

This creates a strong natural market discipline, where user experience directly drives platform accountability.

G. What Should Not Be Imposed

The following DPO-style obligations should not be extended to ALTD services:

- Physical service support requirements
- Installation or field service obligations
- Signal quality guarantees
- Infrastructure-level fault resolution requirements

These obligations are relevant only to infrastructure-based services and are not applicable to application-based platforms.

H. Risks of Over-Regulation

Introducing additional or misaligned obligations would:

- Increase compliance burden
- Slow innovation
- Disproportionately impact smaller players and startups
- Reduce consumer choice

Conclusion

Consumer protection in ALTD/FAST services should:

- Be aligned with OTT frameworks
- Be application-level and platform-agnostic
- Avoid extension of infrastructure-based obligations

A light-touch, OTT-aligned approach ensures effective consumer protection while preserving innovation, competition, and user choice in the evolving digital ecosystem.

[End of Response to Q11](#)

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.

RunnTV's Response

Position Summary

Audience and viewership measurement is a critical pillar for the growth, transparency, and monetisation of the ALTD/FAST ecosystem, and we strongly support the development of a standardised measurement framework for ALTD services in India.

However, ALTD/FAST services should not be measured using traditional sample-based television measurement methodologies, as these are structurally incompatible with digital streaming ecosystems.

A. Fundamental Difference Between TV and ALTD Measurement

1. Television Measurement (Current Model)

- Based on:
 - Sample households
 - Panel-based estimation
- Provides:
 - Indicative, extrapolated data
- Limitations:
 - Limited sample size
 - No real-time granularity
 - Approximation-based

2. ALTD/FAST Measurement (Digital Model)

- Based on:
 - Census-level data (entire user base)
- Provides:
 - Actual, precise viewership data
 - Real-time measurement
 - Granular insights

Digital platforms inherently enable full-universe measurement, eliminating the need for sampling-based estimation.

B. Recommendation: Digital-First Measurement Framework

We recommend:

A dedicated ALTD/FAST audience measurement system based entirely on digital data, capturing actual viewership across platforms without sampling.

This framework should:

- Use:
 - Platform-level data (privacy-compliant)
- Measure:
 - Actual users
 - Actual watch time
 - Actual impressions

C. Separate Measurement Framework for ALTD/FAST

ALTD/FAST requires a distinct measurement system, because:

1. Presence of Digital-Only Channels

- 70%+ channels are:
 - Digital-only
- These channels:
 - Do not exist on traditional TV

Therefore, TV-based measurement systems cannot capture the full ALTD ecosystem.

2. Platform-Level Monetisation Model

- Ad inventory:
 - Managed by ALTD platforms
- Ad sales:
 - Executed separately from traditional TV

Hence, channel-level measurement on ALTD must be independent and not merged with conventional TV measurement.

D. Recommended Measurement Structure

We propose a three-layer reporting structure:

1. ALTD/FAST Measurement (Digital-Only)

- Channel-level measurement across:
 - All ALTD platforms
- Includes:
 - TV channels distributed on ALTD
 - Digital-only channels
- Metrics based on:
 - Actual digital consumption

2. Traditional TV Measurement

- Continue existing measurement:
 - For TV channels on conventional platforms only

3. Combined View (Optional)

- Aggregated measurement for:
 - TV channels across:
 - Traditional TV
 - ALTD platforms

This ensures clarity, avoids duplication, and provides a comprehensive industry view.

E. Key Measurement Metrics for ALTD

Standardised metrics may include:

- Total watch time
- Unique viewers
- Reach
- Session duration
- Ad impressions
- Ad completion rates

F. Advertising Measurement Consideration

A critical distinction:

Television:

- Same advertisement shown to:
 - All viewers at a given time

ALTD/FAST:

- Different users may see:
 - Different ads for the same content slot
- Enabled by:
 - Targeted advertising

Therefore, traditional TV ad measurement methodologies cannot be applied to ALTD platforms in case of ad viewership.

Measurement must be:

- Impression-based
- Digital ad-tech aligned
- User-level (privacy compliant)

G. Data Governance and Privacy

Measurement framework should ensure:

- Privacy-compliant data sharing
- Aggregated reporting
- Protection of:
 - User data
 - Proprietary business data

H. Implementation Approach (Phased)

A phased approach is recommended:

Phase 1: Voluntary Data Reporting

- Platforms share standardised metrics

Phase 2: Standardisation

- Define:
 - Common metrics
 - Reporting formats

Phase 3: Integration

- Establish:

- Unified industry reporting framework

I. Risks of Applying TV Measurement to ALTD

Applying traditional TV measurement methodologies would:

- Lead to:
 - Inaccurate data
 - Under/Over-reporting of viewership
- Distort:
 - Advertising value
 - Market understanding

Legacy measurement systems are not suited for digital ecosystems and should not be extended to ALTD services.

Conclusion

A robust audience measurement framework for ALTD/FAST services should:

- Be digital-first and census-based
- Avoid sample-based methodologies
- Recognise:
 - Digital-only channels
 - Platform-led monetisation
- Support:
 - Accurate ad measurement
 - Industry growth

A modern, technology-driven measurement approach is essential to unlock the full potential of the ALTD/FAST ecosystem in India.

[End of Response to Q12](#)

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.

RunnTV's Response

Position Summary

We support the enablement for platforms, including ALTD/FAST services, to publish periodic viewership data without prior registration, as this promotes transparency, ecosystem growth, and advertiser confidence.

However, such enablement should not be linked to any authorisation or licensing framework, and should not be subject to prior approval requirements.

A. Importance of Viewership Data Publication

ALTD/FAST platforms:

- Generate:
 - Real-time
 - granular
 - census-level data

Publishing such data:

- Enhances:
 - Transparency
 - Market efficiency
- Supports:
 - Advertiser decision-making
 - Ecosystem growth

B. No Linkage with Authorisation Framework

Publication of viewership data should not be conditional upon obtaining authorisation or licensing.

Given that:

- ALTD services are OTT/streaming platforms
- No licensing framework should apply

Any linkage between:

- Data publication
- Authorisation

would:

- Create unnecessary barriers
- Introduce non-essential regulatory complexity

Requiring prior approval for publishing viewership data would defeat the purpose of digital transparency and agility.

C. Need for Light-Touch Standardisation

To ensure consistency and comparability:

- Industry-level standardisation may be encouraged for:
 - Definitions of key metrics such as:
 - Views
 - Watch time
 - Reach
 - Impressions

However:

- This should be:
 - Light-touch
 - Industry-driven
- Not:
 - Prescriptive or restrictive

D. Recommended Safeguards

A balanced approach may include:

- Self-declaration by platforms regarding:
 - Methodology used
 - Definitions of metrics
- Transparency in:
 - Reporting formats
 - Data interpretation

E. Role of Third-Party Measurement Agencies

To enhance credibility and standardisation:

- Independent third-party measurement agencies (such as Nielsen, Comscore, or similar entities) may:
 - Aggregate data from multiple ALTD platforms
 - Publish:
 - Channel-level audience measurement and viewership data

Proposed Model

- Participation:
 - Voluntary for ALTD platforms
- Platforms:
 - May subscribe to such services
- Advertisers:
 - May use these reports for:
 - Media planning
 - Channel selection

Benefits

- Enhances:
 - Credibility of ALTD ecosystem
 - Trust among advertisers
- Enables:
 - Standardised industry benchmarks
- Avoids:
 - Need for heavy regulatory intervention

F. Avoidance of Over-Regulation

The following should not be imposed:

- Mandatory prior approval
- Licensing-linked reporting requirements
- Heavy audit or compliance burdens

Digital transparency should be enabled through market-driven mechanisms, not restricted through licensing constructs.

Conclusion

The publication of viewership data by ALTD platforms should:

- Be:
 - Freely enabled

- Market-driven
- Not be:
 - Linked to authorisation or licensing

A balanced approach involving:

- Self-declaration
- Light standardisation
- Voluntary third-party aggregation

will:

- Build trust
- Enable ecosystem growth
- Support advertiser confidence

A flexible, innovation-friendly approach is essential to ensure that data transparency strengthens, rather than constrains, the ALTD/FAST ecosystem.

[End of Response to Q13](#)

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.

RunnTV's Response

Position Summary

ALTD/FAST services, even when operating under a hybrid model (free and/or paid services), should continue to be governed under the OTT/streaming regulatory framework, and should not be subjected to tariff, interconnection, or DPO-style quality of service regulations.

Regulation should follow the nature of the service, not the pricing model.

A. Nature of ALTD Services Remains Unchanged in Hybrid Models

Whether ALTD services are:

- Fully ad-supported or
- Hybrid (combination of ad-supported and paid offerings)

They continue to remain:

- Application-based
- Delivered over open internet
- Non-infrastructure services

The introduction of a paid component does not alter the fundamental nature of ALTD services as OTT platforms.

B. Industry Position and Market Reality

At present:

- ALTD/FAST ecosystem in India is:
 - Largely ad-supported
 - Focused on scale and ecosystem development

RunnTV's position:

We have a clear and firm strategy to not introduce paid subscription services on our platform, unless mandated by regulation.

This approach is aligned with:

- Global FAST ecosystem evolution
- Consumer adoption patterns in mature markets

The growth of ALTD/FAST globally has been driven primarily through free, ad-supported models.

C. Tariff Regulation Should Not Apply

Tariff frameworks (such as those applicable to DTH/cable):

- Are designed for:
 - Subscription-based broadcast distribution
 - Infrastructure-led services

ALTD services:

- Operate on:
 - Internet-based delivery
 - Flexible, dynamic pricing models (if applicable)

Imposing tariff regulation on ALTD services would be inappropriate and would fundamentally alter their business model and viability.

Global OTT Precedent

Hybrid models are already prevalent across OTT platforms globally:

- Free + subscription tiers
- Ad-supported + premium tiers

These operate:

- Without tariff controls
- Under market-driven pricing

D. Interconnection Framework is Not Applicable

Interconnection regulations are designed for:

- Broadcast signal sharing
- Carriage agreements
- Network-level dependencies

In ALTD:

- Content distribution is:
 - Based on commercial agreements
 - Platform-driven
- There is:
 - No concept of carriage fee
 - No signal routing or dependency

Therefore, **interconnection regulations are not relevant to ALTD services.**

E. Quality of Service (QoS) Considerations

1. Network QoS

- Governed by:
 - Internet Service Providers (ISPs)

2. Application-Level QoS

- Managed by:
 - Platform technology
- Driven by:
 - Market competition
 - User expectations

Imposing DPO-style QoS obligations on ALTD platforms would be disproportionate and not aligned with the service architecture.

F. Limited and Appropriate Consumer Safeguards

If any paid services are introduced in future:

- Platforms may ensure:
 - Transparent pricing (always the case in OTT)
 - Clear terms and conditions

These are already standard practices across OTT platforms.

G. Risks of Extending Broadcast Regulations to ALTD

Applying tariff, interconnection, or QoS regulations would:

- Increase compliance burden
- Limit innovation
- Disincentivise platform growth
- Create barriers for startups and MSMEs

It would also:

- Distort the business model
- Slow down the evolution of the ALTD ecosystem

Conclusion

ALTD/FAST services should continue to be regulated as OTT platforms, irrespective of whether they operate under:

- Free Ad-Supported
- Paid
- Hybrid models

Introducing tariff, interconnection, or DPO-style QoS regulations would be structurally inappropriate and detrimental to the growth of the ALTD ecosystem.

A light-touch, OTT-aligned regulatory approach is essential to:

- Support innovation
- Enable sustainable monetisation
- Encourage ecosystem growth
- Build globally competitive platforms from India

[End of Response to Q14](#)

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.

RunnTV's Response

Position Summary

No additional broadcast-style regulatory obligations (such as channel positioning, EPG rules, revenue sharing mandates, interconnection obligations, or placement controls) should be introduced for ALTD/FAST services.

Digital platforms operate on abundance, not scarcity. Imposing broadcast-era controls on such platforms would constrain innovation, distort market dynamics, and hinder ecosystem growth.

All such aspects should remain:

- Market-driven
- Commercially negotiated
- Technology-led and user-centric

A. Channel Positioning, Home Screen & Discovery

1. No Need for EPG or Placement Regulation

In traditional DPO systems:

- Channel placement regulation exists due to:
 - Limited bandwidth
 - Fixed EPG structures

In ALTD:

- There is:
 - No capacity constraint
 - No fixed channel grid
 - No spectrum limitation

2. Personalised Discovery vs Static EPG

ALTD platforms use:

- Personalisation
- Algorithm-driven recommendations
- User behaviour analytics

User choice and personalisation replace the need for regulated EPG positioning.

Any regulation on:

- Channel placement
- Home screen ordering

would:

- Reduce innovation
- Limit user experience
- Distort competition

B. Revenue Sharing & Commercial Agreements

Revenue sharing between:

- Platforms
- Channel owners

is already:

- Freely negotiated
- Based on:
 - Content type
 - Audience performance
 - Monetisation potential

Mandating revenue sharing structures would interfere with commercial freedom and innovation.

Global OTT ecosystems operate entirely on:

- Commercial agreements
- Dynamic revenue models

C. Interconnection & Carriage Framework

Interconnection regulations are designed for:

- Broadcast signal transmission

- Infrastructure-based dependencies

ALTD services:

- Do not involve:
 - Signal routing
 - Carriage capacity
 - Network interdependencies

There is no concept of “carriage” or “must carry” in ALTD, and therefore interconnection frameworks are not applicable.

D. Marketing & Placement Agreements

Marketing arrangements such as:

- Featured placement
- Promotions
- Discovery partnerships

are standard across:

- App stores
- OTT platforms
- Digital marketplaces

These should remain market-driven, as they:

- Enable monetisation
- Support new entrants
- Drive competition

E. International Best Practices & Regulatory Approaches

1. United States – Light-Touch, Innovation-Led Model

- OTT/FAST platforms operate under:
 - Minimal regulatory intervention
- No:
 - Channel placement regulation
 - Tariff control
 - Interconnection mandates

This has enabled:

- Rapid growth of FAST platforms
- Innovation in:
 - Ad-tech

- Personalisation
- Content discovery

The U.S. approach is widely recognised as innovation-first and scalability-driven.

2. European Union – Targeted Regulation, Not Structural Control

- Regulation focuses on:
 - Content standards
 - Data privacy (e.g., GDPR)
- Does not impose:
 - EPG-style controls
 - Revenue sharing mandates

OTT services are treated as digital content platforms, not broadcast distributors

3. Global OTT Consensus

Across markets:

- OTT/ALTD platforms are:
 - Not treated as transmission networks
 - Recognised as application-layer services

OTT providers are distinct from network operators and operate independently of infrastructure control

4. Policy Consensus on Over-Regulation

Global policy research highlights that:

- Imposing traditional regulatory burdens on OTT:
 - Increases costs
 - Discourages innovation
 - Creates entry barriers

Regulatory intervention aimed at protecting legacy players can reduce overall ecosystem growth and consumer welfare and make India lag in digital media ecosystem compared to its

F. Key Principles for ALTD Regulation

Based on global best practices, the following principles should guide ALTD regulation:

1. Technology Neutrality

- Regulation should not favour:
 - Legacy broadcast models
- Should recognise:
 - Digital-native architectures

2. Market-Driven Ecosystem

- Commercial terms should remain:
 - Negotiated
 - Flexible

3. Innovation First

- Avoid regulation that:
 - Restricts product design
 - Limits discovery mechanisms

4. Consumer-Centric Approach

- Focus on:
 - User choice
 - Accessibility
 - experience

Conclusion

No additional regulatory obligations are required for ALTD services in areas such as:

- Channel positioning
- Revenue sharing
- Interconnection
- Marketing or placement

The ALTD ecosystem should remain governed by market dynamics, innovation, and consumer choice, rather than legacy broadcast frameworks.

Global best practices clearly demonstrate that:

- Light-touch, OTT-aligned regulation
- Avoidance of structural broadcast controls

are essential to:

- Enable innovation
- Support startups and MSMEs
- Ensure competitive markets

- Build globally scalable digital platforms

End of Response to Q15

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