

**COMMENTS**

**ON**

**Consultation paper dated 06<sup>th</sup> April 2026 on  
Formulation of a Regulatory Framework for Application-based Linear  
Television Distribution (ALTD) Services  
(Including Free Ad-Supported Streaming Television (FAST) Services).**

**BY**

**SITI NETWORKS LIMITED**



**Date: 11<sup>th</sup> May 2026**

**To,**

**Dr. Deepali Sharma, Advisor (B&CS),**

Telecom Regulatory Authority of India,

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**Subject: Response to the Consultation paper dated 06<sup>th</sup> April 2026 on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services).**

Dear Madam/Sir,

This is with reference to TRAI's Consultation Paper on '**Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services)**'.

In this regard, please find enclosed our comments to the consultation paper for your kind perusal please.

Thanking You,

Yours Sincerely,

For **SITI Networks Ltd.**



**Rakesh Raushan**

**Manager – Regulatory & Compliance**

**Q.1 What should be the appropriate definition and scope of Application-based Linear Television Distribution Services, i.e., ‘ALTD Services’ in the Indian broadcasting context, taking into account terminologies available internationally? Stakeholders are requested to provide their comments with detailed justification.**

## **OUR REPLY**

In our view, a clear and precise definition of **Application-based Linear Television Distribution (ALTD) Services** is essential for ensuring regulatory parity within India’s evolving broadcasting ecosystem.

The definition and scope should be framed by focusing on the nature of service delivery and the characteristics of the content, rather than being limited to the type of device used.

Accordingly, an appropriate definition of ALTD Services may be articulated as follows:

### **1. Proposed Definition of ALTD Services**

**“Application-based Linear Television Distribution (ALTD) Services”** means the delivery of *scheduled, linear television channels*, akin to existing broadcasting such as Cable TV, DTH, IPTV and HITS by application providers who aggregate and distribute television channels (duly authorised by MIB) to end-users over the internet. Such services are provided through pre-installed or downloadable applications on connected devices, including smart TVs, laptops, mobile phones, tablets etc. and deliver content in a scheduled, linear format.

### **2. Scope of ALTD Services**

The scope must be broad enough to ensure "level playing field" parity with existing Distribution Platform Operators (DPOs). The scope should inter-alia include:

- **First and foremost, ALTD should be addressing ONLY linear content distribution through Application basis and exclude all non-scheduled programs/content distribution.**
- ALTD should also obtain the requisite license/registration from the Ministry of Information & Broadcasting.

- Parity and non-discrimination should be kept in mind among all the existing distribution platforms including ALTD.
  - Similar to the treatment of one STB as an individual subscriber, each connected device should be considered as a separate subscriber/customer.
- The unregulated growth of ALTD/FAST services has resulted in regulatory as well as commercial disparity with the licensed and regulated content distribution ecosystem. This has created significant business challenges for Distribution Platform Operators (DPOs), who are already operating under a strict regulatory framework and are struggling to sustain their distribution business. **Hence, ALTD should be under same regulatory regime as existing DPO are being regulated.**
- Revenue model should also be aligned with the existing regulatory framework.
- **The transmission of linear channels/content, whether live or slightly delayed, by broadcasters on FAST/OTT platforms should be restricted.**
- FAST (Free Ad-Supported Streaming Television Services), as the definition conveys, addresses exclusively Free-to-Air (FTA) linear channels and only FTA linear channels through these services and not any other services.
- The definition of Distribution Platform Operator (DPO) should be amended to include ALTD.

**Revised Definition:**

*“Distribution Service Provider (DSP)” shall mean ‘Distribution Platform Operator (DPO)’ and includes Direct-to-Home (DTH) service provider, Head-end In The Sky (HITS) service provider, Internet Protocol Television (IPTV) service provider, Multi-System Operator (MSO), ALTD Service Provider or any other service provider engaged in distribution of linear programme(s)/television channel(s) to the users; ’*

- Linear channels/content should not be allowed on any other platforms except as covered under DSPs.

- It is recommended that ALTD and FAST TV be treated as distinct categories.

### **Question No 2:**

**The ‘ALTD Services’ ecosystem involves multiple entities, including application providers, television equipment manufacturers, operating system providers, broadcasters, content providers, content aggregators and other technology or solution providers. However, the application provider appears to play a central role in the distribution of linear television channels across various business models.**

**In this context, should the Application Provider be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of ‘ALTD Services’?**

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

### **OUR REPLY:**

We fully agree with the Authority’s observation that the Application Provider plays a central role in the distribution of linear television channels across various business models under ALTD Services.

The ALTD ecosystem comprises multiple stakeholders, including:

- **TV Manufacturers (OEMs):** These companies provide the television set and/or may have their own integrated application platforms.
- **Operating System Providers:** Entities that develop and control the software environment within which applications operate.
- **Application Providers:** Dedicated platforms or apps that aggregate and distribute linear channels to end-users.
- **Content/Solution Partners:** Third-party companies/aggregators that onboard content providers and facilitate content delivery to the platforms.

As per roles and responsibilities of the above stakeholders clearly establishes that the **Application Provider is the primary entity responsible for**

**aggregation, packaging, and distribution of linear channels to consumers,** through applications or operating systems.

Accordingly, the Application Provider performs functions that are **functionally equivalent to the Distribution Platform Operators (DPOs)** in the existing broadcasting ecosystem, including channel selection, packaging, pricing, and direct consumer interface.

In view of the above, it is submitted that:

- The **Application Provider should be designated as the primary stakeholder responsible for obtaining authorization** for provisioning of ALTD Services; and
- Such Application Providers should be **brought under the regulatory framework as applicable to DPOs**, such as provisions relating to licensing/authorization, tariff, interconnection, quality of service, and consumer protection and all other provisions as applicable to DPOs.

**Question 3: What should be the terms and conditions including fees or charges for the grant of service authorisation to the application providers provisioning ‘ALTD Services’ in India, under the ‘Television Channel Distribution Services’ as recommended in Annexure-II of ‘Authorisation Recommendations dated 21st February 2025’? Stakeholders are requested to provide their detailed comments including but not limited to the following conditions:**

- a. **Service Area**
- b. **Validity Period**
- c. **Eligibility Conditions**
- d. **Minimum Net worth**
- e. **Processing Fee**
- f. **Entry Fee**
- g. **Bank Guarantee**
- h. **Authorisation Fee**
- i. **Security Deposit**
- j. **Roll Out Obligations**
- k. **Any other terms and conditions**

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

**Question 4: What should be the common terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part-I of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:**

- a. Renewal of Authorisation**
- b. Renewal Fee**
- c. Equity Holding and Management Control**
- d. Restriction on cross-holding of equity shares/capital contribution between**
  - (i) TV broadcasters and application providers provisioning ALTD services**
  - (ii) Application Providers provisioning ALTD services and other DSPs**
- e. Transfer/Surrender of Service Authorisation**
- f. Sharing of Infrastructure**
- g. Any other terms and conditions**

**OUR RESPONSE:**

**RESPONSE to Question No 3**

We submit that the terms and conditions for grant of authorisation to Application Providers provisioning ALTD Services should be **broadly aligned with the existing framework applicable to Distribution Platform Operators (DPOs)** like DTH and HITS under "Television Channel Distribution Services", with **appropriate adaptations** to reflect the **internet-based, scalable, and pan-India nature** of ALTD services.

This approach will ensure **regulatory parity, prevent arbitrage, and promote orderly growth**, while avoiding over-regulation.

## **Terms & Conditions for Grant of Authorisation**

### **a. Service Area**

- The authorisation should be granted on a **Pan-India basis**, similar to existing DPOs.

### **b. Validity Period**

- A validity period of **10 years** is recommended aligned with MSOs.

### **c. Eligibility Conditions:**

- Should be same as applicable to existing DPOs such as:
  - The applicant must be an Indian company registered under the Companies Act (or an LLP), with Indian management control, majority Indian representation on the Board, and a resident Indian CEO.
  - Permitted to have FDI as per applicable Government policy.
  - Applicable technical standards and other obligations (aligned with IPTV service requirements) must be complied with.
  - Mandatory security clearance of the Board of Directors and key executives must be obtained in consultation with the Ministry of Home Affairs.

### **d. Minimum Net worth**

- A moderate and proportionate net worth requirement should be aligned with DTH/HITS.
- Suggested: **Rs. 25 crores** to ensure only serious players should participate.

### **e. Processing Fee**

- A **nominal, one-time non-refundable processing fee** (e.g., Rs. 1 lakh) should be prescribed aligned with other DPOs.

**f. Entry Fee**

- Suggested at Rs. 10 crores to ensure only serious players participate.

**g. Bank Guarantee**

- A **reasonable Performance Bank Guarantee (PBG)** should be prescribed to ensure compliance.
- Suggested at Rs. **5 crores**, to ensure only serious players participate.

**h. Authorisation Fee**

- A percentage of Adjusted Gross Revenue (AGR) aligned with DTH Services, or
- A nominal fixed fee in initial years

**i. Security Deposit**

- A **reasonable Performance Bank Guarantee (PBG)** should be prescribed to ensure compliance.
- Suggested: **Rs. 5 crores**, significantly lower than DTH, but ensuring seriousness of players.

**j. Roll Out Obligations**

- ALTD Services is required to launch of service within 12 months from the date of obtaining the licence as applicable in other Broadcasting services.
- Compliance with QoS and consumer grievance mechanisms.

**k. Any other terms and conditions**

- Mandatory compliance with TRAI Regulations on Tariff, Interconnection and QoS.
- Standardised agreements between broadcasters and ALTD providers.
- Must Carry/Must provide provisions to be aligned with existing regulatory requirement for DPOs.
- Applicable content/programming and advertisement codes.
- Transparency in Channel offering, Channel listing, pricing and packaging.
- Non-discriminatory treatment of broadcasters
- Robust grievance redressal mechanism
- Minimum service benchmarks for streaming quality

## **RESPONSE to Question No 4**

### **a. Renewal of Authorisation**

- Application for renewal should be submitted **at least 6 months prior** to expiry.
- Renewal should be permitted for **subsequent terms (Suggested: 10 years) subject to fresh security clearance from MHA.**

### **b. Renewal Fee**

- Renewal fee should be equivalent to a new application fee.

### **c. Equity Holding and Management Control**

- Equity holding and management control should be same such as:
- \*The applicant company must have Indian Management Control with majority representatives on the board as well as the Chief Executive of the company being a resident Indian.
- Total foreign equity should be applicable such as DPOs.
- Within foreign equity, the FDI component not to exceed 20%.
- Any change in equity structure shareholding agreements require prior approval of the licensor.
- Annual disclosures of investment details must be submitted, with additional disclosures as and when required by the Government.

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

- TV broadcasters and application providers provisioning ALTD services**
  - Application Providers provisioning ALTD services and other DSPs**
- Restriction on cross-holding between broadcasters, ALTD service providers, and other DPOs should be restricted to ensure fair competition and prevent anti-competitive practices. A suitable cap (**e.g., up to 20%**), in line with existing broadcasting sector guidelines, may be prescribed instead of a complete prohibition.

- No entity should exercise control or have significant influence, directly or indirectly, over more than one segment (broadcasting and distribution) beyond the prescribed limits.
- The Licensee shall furnish details of its shareholding pattern and investments in other entities at the time of application and thereafter on an annual basis, within one month of the start of each financial year.
- Any change in ownership, control, or shareholding beyond the prescribed thresholds shall require prior approval of the Government.

**e. Transfer/Surrender of Service Authorisation**

Following conditions must be imposed for Transfer/Surrender of Authorisation:

- Transfer of licence should not be permitted.
- Surrender should require at least 6 months advance notice to its subscribers and Licensor and clearance of all dues and liabilities.

**f. Sharing of Infrastructure**

Infrastructure sharing may be permitted to promote efficiency, subject to:

- Security conditions
- Infrastructure Sharing Regulatory Compliance
- Non-compromise of service quality

**g. Any other terms and conditions**

- Strict compliance with national security directives
- Adherence to content regulations issued by Ministry of Information & Broadcasting
- Periodic reporting and disclosures to regulatory authorities
- Applicability of future broadcasting legislation to ensure regulatory consistency
- ALTD services should be subject to similar Regulations issued by TRAI especially Quality of Service (QoS) Tariff and Interconnection Regulations, Provision for Audit from TRAI's empaneled agency and operational conditions to ensure consumer protection, transparency, and fair competition, such as following requirements:

- Electronic Programme Guide (EPG) Requirements
- Logical Channel Numbering (LCN) Conditions
- Non-Discrimination and Fair Carriage

**Question 5: What should be the specific terms and conditions for the authorised entities provisioning ‘ALTD Services’ in India, under the ‘Television Channel Distribution Services’ as recommended in Part-II of Annexure-III in ‘Authorisation Recommendations dated 21st February 2025’? Stakeholders are requested to provide their detailed comments on the following conditions:**

- a. Reservation of operational channel capacity by Vertically Integrated Entity**
- b. Platform Services (PS) offered by application providers provisioning ALTD services**
- c. Monitoring and Inspection of facilities**
- d. Supply of Information to Central Government/TRAI**
- e. Contravention of terms and conditions of authorisation**
- f. Any other terms and conditions**

**Further, whether the mandatory sharing of Sports Broadcasting Signals with Prasar Bharati and the compulsory transmission of certain channels as mandated for DTH, HITS and IPTV services should be applied to the application providers provisioning ‘ALTD Services’. Stakeholders are requested to provide their comments with detailed justification on all such obligations that should be made applicable on such entities.**

**OUR RESPONSE:**

In this regard, it is submitted that ALTD Services operate in a manner functionally similar to existing Distribution Platform Operators (DPOs), hence the specific terms and conditions applicable to such entities should be aligned with existing regulatory provisions applicable to existing DPOs to ensure parity, non-discrimination and transparency so as to maintain a level playing field across platforms.

**a. Reservation of operational channel capacity by Vertically Integrated Entity**

In line with the provisions applicable to Other Platform operators, it is proposed that:

- A vertically integrated entity shall **not reserve more than 20% of its total operational channel capacity** for its affiliated broadcasters.

**b. Platform Services (PS) offered by application providers provisioning ALTD services**

In alignment with existing regulations applicable to DTH and MSOs:

- ALTD providers may be permitted to offer **Platform Services (PS)** channels exclusively to their subscribers.
- The number of PS channels should be capped at **5% of the total channel carrying capacity**.
- PS Channels should not include foreign TV channels that are not registered in India.
- The platform services channels shall be categorised under the genre 'Platform Services' in the Electronic Programmable Guide (EPG) subject to orders/directions/regulations issued by TRAI from time-to-time.

**c. Monitoring and Inspection of facilities**

In line with the provisions applicable to Other Platform operators, it is proposed that:

- In line with existing regulations applicable to DPOs, the Licensee shall, at its own cost, establish and maintain necessary facilities for continuous monitoring of ALTD services.
- The Licensee shall keep recordings of all programmes and advertisements carried on the platform for a minimum period of 90 days from the date of broadcast.
- Such recordings shall be made available to the Licensor or its authorised representatives, as and when required, for inspection or verification purposes.

#### **d. Supply of Information to Central Government/TRAI**

In line with the provisions applicable to Other Platform operators, it is proposed that:

- For supply of information to the Central Government/TRAI, it is proposed that the Licensee should furnish such information, data, and reports as may be required from time to time.
- This shall include, inter alia, subscriber/viewership data (as applicable), channel lineup and pricing details, interconnection agreements (where applicable), technical parameters, and financial and operational data.
- Reporting shall be periodic, in a standardised format, and preferably through digital submission to minimise compliance burden.

#### **e. Contravention of terms and conditions of authorisation**

- In case of violation of license conditions, the Licensor may impose financial penalties, suspend operations, or revoke the authorisation in cases of repeated or continued non-compliance.
- A graded penalty framework may be prescribed, with penalties up to Rs. 5 Lakh, depending on the nature and severity of the violation.
- Repeat or wilful violations shall attract stricter enforcement action.
- The principles of natural justice shall be adhered to, including issuance of notice and providing the Licensee an opportunity to be heard before any action is taken.
- The decision of the licensing authority shall be final.

#### **f. Any other terms and conditions:**

- The Licensee shall ensure strict adherence to the Programme Code and Advertisement Code, as prescribed by the Ministry of Information & Broadcasting from time to time.
- Channel listing, ranking, and placement should be fair, transparent, and non-discriminatory.
- Compliance with applicable Indian data protection and IT laws

## **Applicability of Mandatory Obligations (Sports Signals & Must-Carry Channels)**

### **1. Sharing of Sports Broadcasting Signals with Prasar Bharati**

The obligation relating to **mandatory sharing of sports broadcasting signals with Prasar Bharati** (under the Sports Broadcasting Signals Act) is **content-centric** and aimed at public interest. Accordingly:

- This obligation must **continue to apply to broadcasters/content rights holders**;
- ALTD providers, being distribution platforms, must be required to carry such shared feeds/channels, where made available and ensure non-discriminatory access to such content.

### **2. Mandatory Carriage of Certain Channels (Must-Carry Obligations)**

- Must-carry obligations applicable to DPOs—such as carriage of DD Mandatory channels and other notified public service channels—should be extended to ALTD providers.
- This will ensure universal access to public service broadcasting and maintain regulatory parity across all distribution platforms.

**QUESTION 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.**

### **OUR RESPONSE:**

It is submitted that while the primary responsibility for obtaining authorisation should rest with the Application Providers, an appropriate assurance and certification mechanism is necessary for television manufacturers (OEMs) and operating system (OS) providers to ensure that only duly authorised ALTD service applications are made available to end-users.

In this regard, we proposed that a self-certification framework supported by centralised verification and regulatory oversight is an appropriate mechanism to ensure availability of only authorised ALTD services. Accordingly, we proposed following mechanism:

- **Self-certification with due diligence:** OEMs/OS providers shall ensure that all ALTD applications (pre-installed or listed on app stores/platforms) are operated by entities holding valid authorisation from the Ministry of Information & Broadcasting, supported by undertakings from application providers and periodic compliance declarations.
- **Centralised Authorised ALTD Registration:** A digital registry of authorised ALTD providers may be maintained by the Government/TRAI, which OEMs/OS providers shall verify prior to pre-installation or listing of applications, enabling ease of compliance and real-time verification.
- **Unique Authorisation ID:** Each authorised ALTD service provider should be issued a unique Authorisation ID, which must be embedded within the application.
- **Standardized Agreement Templates:** There should be **standardized agreement templates** prescribed for agreements between television manufacturers and application providers/content aggregators/ Operating system providers.
- **App store compliance framework:** OS providers/app store operators shall allow listing of only authorised ALTD applications and ensure prompt removal/disablement of unauthorised apps or those whose authorisation has expired, been suspended, or revoked, supported by a notice-and-takedown mechanism.
- **Periodic compliance reporting and audit:** OEMs/OS providers shall submit periodic compliance reports (e.g., annually), maintain records, and facilitate risk-based, non-intrusive audits/inspection by the Government/TRAI.
- **Clear allocation of liability:** Primary responsibility for regulatory compliance shall rest with the application provider; OEMs/OS providers shall be liable only in cases of wilful negligence or failure to act on regulatory directions.
- **Uniform applicability:** The framework shall apply across all access modes, including pre-installed apps on devices, app store downloads, and web-based access (to the extent feasible).
- **Consumer transparency:** Authorised ALTD applications shall be clearly identified/labeled (e.g., “Authorised ALTD Service”) to enhance consumer awareness and trust.

**Question 7: What kind of assurance mechanisms should be instituted to ensure that the applications providers authorised for provisioning ALTD services carry only those channels which are authorised/permited by MIB for distribution in India. What kind of penalty/disincentive/deterrent be instituted for non-compliance? Provide your comments with justification.**

**OUR RESPONSE:**

In response to this question, we would like to submit that ensuring carriage of only authorised television channels is a core regulatory requirement, directly linked to content regulation, national security, and consumer protection. Since ALTD platforms function similarly to existing DPOs, an appropriate technology-enabled assurance and enforcement framework is essential to maintain regulatory parity and effective oversight.

In view of the above, it is submitted that authorisation/licence for provisioning ALTD services should be granted by the Ministry of Information and Broadcasting subject to compliance with prescribed eligibility conditions and the following requirements:

- No Application Provider shall carry or distribute any television channel unless it is **duly permitted/registered by the Central Government (MIB)** for downlinking in India.
- The Ministry of Information & Broadcasting should maintain a **centralised digital database** of all permitted TV channels and updated data may be released on monthly basis.
- ALTD platforms should integrate appropriate technical verification mechanisms, including API-based validation systems, to ensure real-time verification of authorisation status before onboarding or continuing carriage of any channel.
- ALTD providers should submit periodic self-certification/compliance reports confirming that only authorised channels are being carried on their platform.
- The Government/TRAI may undertake periodic monitoring, audit, or inspection of ALTD platforms to verify compliance with applicable regulatory requirements.

### **Proposed Penal provisions in case of non-compliance**

- In case of violation of licence conditions, including carriage of unauthorised channels, the Licensor may impose financial penalties, suspend operations, or revoke the authorisation in cases of repeated or continued non-compliance. A graded penalty framework may be prescribed, with penalties up to **Rs. 5 crores** depending upon the nature and severity of the violation.
- However, before taking any such action, the licensing authority shall provide the Licensee a reasonable opportunity of being heard in accordance with the principles of natural justice. The decision of the licensing authority shall be final.

The above framework would ensure effective regulatory compliance, prevent carriage of unauthorised content, safeguard consumer interest and national security, and maintain parity with the regulatory obligations applicable to other distribution platform operators.

**Question 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.**

### **OUR RESPONSE:**

In this regard, it is submitted that ALTD services are essentially television distribution services delivered through internet-based platforms and should therefore remain aligned with the regulatory framework applicable to existing Distribution Platform Operators (DPOs).

Accordingly, ALTD service providers should not be permitted to offer independent value-added services beyond the scope of broadcasting distribution activities. As an alternative, they may only be permitted to provide platform services, similar to those presently allowed for existing DPOs under the existing regulatory framework.

In this regard, the following may be considered:

- ALTD providers may offer platform services which are directly related to broadcasting and distribution activities and are made available exclusively to their own subscribers.

- Such platform services should remain subject to applicable Programme Code, Advertisement Code, and other regulatory guidelines issued by the Ministry of Information and Broadcasting and/or TRAI from time to time.
- ALTD providers should not be permitted to offer unrelated value-added services that may alter the fundamental nature of the licensed broadcasting distribution activity, including by bypassing channel registration/authorisation requirements, or create regulatory imbalance vis-à-vis existing DPOs.
- Any platform services offered by ALTD providers should be clearly distinguishable from licensed television channels and should not circumvent applicable content regulation or licensing requirements.

In our opinion, permitting unrestricted value-added services by ALTD providers may lead to regulatory arbitrage and create an uneven playing field with existing DPOs, which are presently governed by a defined framework for platform services. Therefore, to ensure regulatory parity, consistency, and systematic growth of the broadcasting sector, ALTD providers should be permitted to offer only platform services on lines similar to existing DPOs.

**Question 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.**

**OUR RESPONSE:**

As both satellite-based broadcasters and ground-based broadcasters/content owners may provide television channels on ALTD platforms, it is essential that an appropriate regulatory framework be prescribed for both categories to ensure regulatory parity and consumer protection.

Satellite-based broadcasting is already regulated, and broadcasters are permitted to operate television channels only after obtaining the requisite permissions/registration from the Ministry of Information and Broadcasting. However, at present, there is no specific regulatory framework governing ground-based broadcasting, thereby creating a regulatory gap.

In view of the above, it is submitted that both satellite-based broadcasters and ground-based broadcasters/content owners should be covered within the definition of "Broadcaster" and should be subject to similar regulatory obligations and compliance requirements, mutatis mutandis. Accordingly, both categories should be mandated to obtain appropriate authorisation before entering into agreements with authorised ALTD service providers.

Applying a uniform regulatory framework to both satellite-based and ground-based broadcasters would ensure a level playing field, prevent regulatory arbitrage, and maintain consistency in content regulation and consumer protection obligations. Since both categories of broadcasters provide functionally similar television services to consumers, differential regulatory treatment may create market distortion and undermine the existing broadcasting regulatory ecosystem.

Accordingly, it is suggested that all relevant provisions presently applicable to satellite-based broadcasters be extended to ground-based broadcasters as well.

**Question 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.**

**OUR RESPONSE:**

To ensure price parity across DPOs platforms, ALTD providers should be governed by the same New Tariff Order (NTO) framework that applies to existing Distribution Platform Operators (DPOs). The methodology should include:

**1. MRP Cap Adherence**

Broadcasters must offer their pay channels to ALTD platforms at the same Maximum Retail Price (MRP) declared for Cable and DTH. This prevents "platform-based discrimination" where a channel might be priced lower on an app than on satellite TV, causing market distortion.

**2. Uniform Interconnect Regulations**

The pricing should be based on the Reference Interconnect Offer (RIO). Broadcasters should be mandated to provide their signals to ALTD providers on a non-discriminatory basis. The "net-effective price" to the consumer should not vary significantly across different delivery technologies.

### **3. Bundle and Bouquet Parity**

If a broadcaster offers a bouquet of channels to a DTH operator, the same bouquet must be available to the ALTD provider at the same wholesale price. This ensures that the consumer pays the same amount for a "Star" or "Zee" pack regardless of whether they watch it via a Set-Top Box or an ALTD App.

#### **Justification for this Methodology**

- 1. Prevention of Regulatory Arbitrage:** Currently, pay channels are often bundled into OTT subscriptions at opaque prices. Bringing ALTD under the NTO framework ensures that "linear" content is priced identically across all "linear" delivery modes, preventing existing DPOs from being disadvantaged.
- 2. Orderly Growth:** A consistent pricing framework would protect the existing broadcasting ecosystem and ensure that ALTD services grow on the basis of service quality, innovation, and consumer convenience, rather than through predatory or discriminatory pricing practices.
- 3. Consumer Protection:** A consumer should know that the cost of a "Pay Channel" is fixed by the broadcaster and remains constant, ensuring they are not overcharged on certain platforms.
- 4. Technological Neutrality:** Since ALTD platforms deliver the same linear and scheduled television content as existing Cable TV and other DPO platforms, the applicable tariff and financial regulations should remain technology-neutral and aligned with the principle of "same service, same rules."

Additionally, it is important to highlight that even within the regulated ecosystem, particularly in the MSO segment, complete price parity is not effectively maintained due to unregulated marketing incentives offered by broadcasters. These incentives are often used as tool to manipulate the pricing of channels and convert the RIO deals to fixed fee deals and thereby distorting the pricing framework and revenue-sharing arrangements. Therefore, a transparent, non-discriminatory, and standardised framework governing marketing incentives should also be made applicable to both ALTD and existing DPOs to ensure genuine price parity, fair competition, and regulatory consistency across all distribution platforms.

In view of this, we propose that the pricing methodology should be similar to the "regulated DPO model" for all linear television content, ensuring that the same television channels are subject to uniform Tariff, Interconnection, and non-discrimination principles across all distribution platforms, including ALTD services.

**Question 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.**

**OUR RESPONSE:**

The obligations for authorised entities providing ALTD services with respect to consumer protection and grievance redressal should be aligned with those applicable to other regulated Distribution Platform Operators (DPOs) such as Quality of Services Regulations issued by TRAI, in order to ensure regulatory parity with suitable modifications considering the internet-based and multi-device nature of ALTD services.

Since, ALTD services are accessed through smart televisions, websites, mobile applications, streaming devices, and other digital interfaces, a technology-neutral and consumer-centric framework should be prescribed to ensure transparency, accountability, and effective grievance resolution.

In this regard, the following obligations may be prescribed:

- ALTD service providers should establish a dedicated consumer grievance redressal mechanism, including customer care support through multiple channels such as toll-free numbers, email, mobile applications, websites, and online ticketing systems.
- The name, contact details, and escalation matrix of grievance officers/nodal officers should be prominently displayed on all consumer interfaces, including applications, websites, and smart TV interfaces.
- Time-bound resolution of consumer complaints should be prescribed in line with the Quality of Service (QoS) and Consumer Protection Regulations applicable to existing DPOs, to the extent applicable.
- Consumers should be provided clear and transparent information regarding subscription plans, pricing, bouquet composition, channel availability, billing, refund policies, and terms and conditions prior to subscription.
- Any modification in pricing, bouquet composition, channel discontinuation, or terms of service should be communicated to consumers in advance through appropriate digital means.

- Appropriate parental control features, content classification mechanisms, and age-based access controls should be provided across all modes of access, including smart TVs, mobile applications, and websites.

In our opinion, a uniform consumer protection and grievance redressal framework would enhance consumer confidence, ensure accountability of service providers, promote transparency, and maintain regulatory parity across all television distribution platforms.

**Question 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.**

**Question 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.**

#### **OUR RESPONSE:**

In light of the revised policy guidelines dated 27th March 2026 issued by the Ministry of Information and Broadcasting, any enablement for publication of periodic viewership data should be aligned with the proposed authorisation framework for ALTD service providers to ensure regulatory parity and fairness.

Since ALTD platforms deliver linear television channels similar to existing DPOs, their viewership data may be integrated into the television audience measurement ecosystem in a phased and standardised manner, subject to appropriate safeguards and compliance obligations.

In this regard, the following may be considered:

- ALTD service providers should be required to maintain accurate, reliable, and auditable viewership data records in a standardised format prescribed by the Government or authorised rating agencies.
- The methodology for integration of ALTD data into the television ratings framework should be transparent, technology-neutral, independently auditable, and uniformly applicable across all platforms to ensure credibility and comparability of ratings data.
- OTT platforms, presently being outside the scope of the broadcasting regulatory framework, should not be permitted to distribute linear television channels. Accordingly, viewership data relating to linear channels distributed through unregulated OTT platforms should not be considered for television audience measurement purposes.
- Any published viewership data should clearly disclose the methodology, measurement parameters, duration, sample basis (where applicable), and platform coverage to avoid misleading representation or market distortion.

Accordingly, a phased & standardised framework would be most appropriate for integration of ALTD services into the television audience measurement ecosystem.

**Question 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.**

**OUR RESPONSE:**

Application providers provisioning ALTD services under a hybrid business model offering both free and paid services should be brought under a regulatory framework similar to that applicable to other regulated Distribution Platform Operators (DPOs), in order to ensure regulatory parity and a level playing field.

With respect to tariff, all paid services should be subject to the same tariff regulations applicable to existing DPOs and pay channels should not be offered free of cost on any platform. Free-to-Air and pay channel classification should remain consistent across all platforms. Accordingly, ALTD should not be offering any Pay channels as Free and should follow all the applicable regulations with respect to pricing and bundling as being followed by existing DPOs.

In respect of interconnection, ALTD service providers should be required to enter into formal interconnection agreements with broadcasters/content owners on transparent and non-discriminatory terms, similar to the framework applicable to existing DPOs (MSOs, DTH, IPTV and HITS operators).

Further, quality of service obligations, including consumer grievance redressal, service transparency, complaint resolution, and minimum service standards, should also be made applicable to ALTD service providers.

Since ALTD services are increasingly delivering television-like content to consumers, differential regulatory treatment may create market distortion and adversely impact regulated DPOs, particularly MSOs. Therefore, uniform regulatory obligations should be prescribed across all platforms.

**Question 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.**

#### **OUR RESPONSE:**

It is submitted that certain critical issues, though not clearly covered in the consultation paper, merit consideration while formulating a comprehensive regulatory framework for ALTD services. These include aspects such as channel positioning on home screens, EPG accessibility, revenue sharing arrangements, interconnection frameworks, and marketing and placement agreements, all of which have a direct bearing on fair competition and market dynamics hence should be similar to existing DPOs.

In addition to the above, there are certain other issues as mentioned below affecting the existing eco system and require urgent attention of the Authority:

**1. OTT Platforms:**

- It is pertinent to note that, in the absence of a dedicated regulatory framework governing OTT platforms, it has become imperative to bring such platforms under an appropriate regulatory regime.

This results in not only **regulatory irregularity/ non parity but also** creates **market distortion, unfair competition, and a non-level playing field**, particularly impacting cable TV distribution platforms (MSOs), which are already operating under stringent regulatory and compliance requirements. Because of which the MSOs are financial distress and bleeding heavily.

In view of the above, it is respectfully submitted that OTT platforms should not be permitted to provide linear or linear-like services and should bring such (OTT) services under an appropriate authorisation or licensing and Regulatory regime, aligned with the nature of services offered and bring Regulatory parity.

**2.** Appropriate guidelines should be prescribed regarding placement and discoverability of television channels on home screens, user interfaces, and Electronic Programme Guides (EPGs) to prevent discriminatory treatment or preferential placement practices.

**3.** Revenue sharing arrangements, marketing support fees, placement agreements, and promotional incentives between broadcasters and ALTD providers must maintain parity with the framework applicable to existing DPOs and be transparent and non-discriminatory.

**4.** A standardised framework governing marketing incentives should be considered to prevent distortion of pricing frameworks and interconnection arrangements.

**5.** Bundling of linear television channels with value-added services or on-demand/OTT content should not be permitted in a manner that circumvents the prescribed tariff framework or distorts channel pricing transparency.

Since ALTD services are functionally similar to existing broadcasting distribution platforms, the regulatory framework should ensure parity, transparency, and consistency across all modes of television distribution. Any regulatory gap between existing DPOs, ALTD platforms, and OTT-based linear distribution services may result in market distortion, unfair competition, regulatory arbitrage, and long-term harm to the existing broadcasting ecosystem.

Accordingly, a comprehensive and technology-neutral regulatory framework covering the above aspects is essential to ensure orderly growth of the broadcasting sector, protection of consumer interest, and fair competition across all platforms.

Thanking You  
Yours Sincerely  
for **Siti Networks Limited**



Rakesh Raushan  
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