

SWIFT TV

Connected Television & FAST Platform — India

RESPONSE TO CONSULTATION PAPER NO. 02/2026

Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services including FAST Services

Submitted to	Dr. Deepali Sharma, Advisor (Broadcasting & Cable Services) Telecom Regulatory Authority of India
Submitted by	Abhishek Singh, Founder & CEO — SWIFT TV
Date	30th April 2026
Reference	Consultation Paper No. 02/2026 dated 06th April 2026

Executive Summary

India's connected television landscape is at a pivotal inflection point. With over 20 million connected TV (CTV) devices active today and projections exceeding 40 million by 2028, Free Ad-Supported Streaming Television (FAST) channels represent the next frontier of broadcast innovation — combining the familiarity of linear television with the precision and economics of digital advertising.

SWIFT TV welcomes TRAI's Consultation Paper No. 02/2026 as a timely and necessary step towards creating regulatory clarity for Application-based Linear Television Distribution (ALTD) services. Our submissions are guided by three overarching principles:

- Innovation-first regulation: Rules should enable, not precede, the market's natural development
- Proportionality: Compliance burdens must be calibrated to the scale and risk profile of ALTD operators
- Technology neutrality: The framework should be platform- and device-agnostic, future-proofing India's CTV ecosystem

This response addresses all questions raised in the Consultation Paper, identifies regulatory gaps not covered in the initial submission, and provides data-backed arguments to support a light-touch, registration-based framework. SWIFT TV urges TRAI to resist transposing legacy broadcast regulations onto a fundamentally different technological model and instead design a governance structure that positions India as a global leader in FAST television.

Metric	Data Point
India CTV Households (2025)	~20 million (FICCI-EY 2025)
Projected CTV Households (2028)	>40 million
India FAST Ad Revenue (2024)	~USD 120 million
Projected FAST Ad Revenue (2028)	~USD 600 million
Global FAST Market Size (2024)	USD 6.8 billion (Omdia)
Active FAST Channels Globally	>1,500 channels across platforms
India Digital Ad Market CAGR	~18% (2023–2027)

1. About SWIFT TV

SWIFT TV is among the early builders of India's FAST distribution infrastructure layer, it is a Connected TV (CTV) and Free Ad-Supported Streaming Television (FAST) platform operating in India. The platform delivers curated linear channels and on-demand content to audiences across smart TVs, streaming sticks, and connected devices. SWIFT TV operates on an ad-supported model, enabling free access to premium content for Indian households.

SWIFT TV occupies a unique position in the media value chain — bridging traditional broadcasters (who retain content rights) with modern audiences (who expect digital delivery), and providing brands and advertisers with contextual, programmatic access to engaged, lean-back television viewers. Our stake in the outcome of this regulatory process is direct and material.

2. Response to Q1: Definition and Scope of ALTD Services

2.1 Proposed Revised Definition

We propose the following definition, which improves upon the draft in the Consultation Paper by providing technological precision and regulatory clarity:

Proposed Definition: "Application-based Linear Television Distribution (ALTD) Services are internet-delivered, application-based platforms that aggregate, curate, and/or distribute linear channels and/or on-demand content to end-users via connected devices, typically monetised through advertising, subscription, or hybrid models. ALTD services are characterised by scheduled or curated content streams, a single-user interface or application layer, and delivery over IP networks without requiring traditional broadcast spectrum."

2.2 Why ALTD Is a Distinct Category

The ALTD model differs from existing regulatory categories across three critical dimensions:

Dimension	Traditional DPO (DTH/Cable)	OTT Platform	ALTD / FAST
Delivery Infrastructure	Satellite / Coaxial	Internet (on-demand)	Internet (linear + on-demand)
Spectrum Usage	Licensed spectrum required	None	None
Content Scheduling	Broadcaster-controlled	User-controlled (VOD)	Platform-curated linear

Dimension	Traditional DPO (DTH/Cable)	OTT Platform	ALTD / FAST
Monetisation	Subscription / carriage fee	Subscription / TVOD	Ad-supported / hybrid
Regulatory Basis	Cable TV Act / DTH Guidelines	IT Act 2000 / MIB OTT Guidelines	Currently undefined

Treating ALTD under the Cable Television Networks (Regulation) Act, 1995 or existing DTH licensing guidelines would impose spectrum-era obligations on an IP-delivered service — a fundamental regulatory mismatch. Similarly, subsuming ALTD under the MIB's 2021 OTT guidelines would overlook the linear, broadcast-like scheduling model that distinguishes FAST from on-demand platforms.

RECOMMENDATION: ALTD/FAST should be designated as a separate regulatory category under a dedicated framework, independent of Cable TV Act obligations and MIB OTT Guidelines. A standalone TRAI/MIB framework calibrated to IP-delivered linear services is recommended.

2.3 Scope — Inclusions and Exclusions

The ALTD definition should explicitly cover:

- FAST-native linear channels delivered via CTV/OTT applications
- Licensed broadcaster channels redistributed via internet-based application layers
- Hybrid AVOD/FAST platforms offering both linear and on-demand content
- White-label FAST infrastructure providers operating under a B2B model

The definition should explicitly exclude:

- Traditional DTH, cable, IPTV, or satellite platforms governed by existing licensing frameworks
- Pure SVOD/TVOD platforms without any linear channel component
- Social media platforms offering incidental live streaming (YouTube Live, Instagram Live)
- Enterprise internal broadcast systems (corporate video distribution platforms)

3. Response to Q2: Primary Stakeholder for ALTD Services

3.1 Application Provider as Primary Stakeholder

We agree that the Application Provider — the entity that operates the ALTD platform, aggregates content, manages the user interface, and controls monetisation — should be designated as the primary regulated stakeholder. This is consistent with the 'control follows responsibility' principle observed in comparable international frameworks (FCC, Ofcom, ARPU framework in Australia).

3.2 Proportionate Shared Accountability Model

However, responsibility must be distributed proportionately across the value chain to avoid concentrating compliance burdens on a single layer:

Stakeholder	Primary Responsibility	Secondary Oversight
Application Provider (ALTD Platform)	UX, content aggregation, ad standards, grievance redressal, data governance	Registration & periodic compliance reporting
Content Provider / Broadcaster	Programme Code compliance, content certification, EPG/metadata accuracy	Contractual compliance obligations to platform
Ad Network / DSP	Advertising Code compliance, brand safety, DPDP Act user consent	Platform-level ad audit rights
OEM / OS Provider	Pre-installation terms, app store policies	No direct TRAI regulatory obligation
CDN / Hosting Provider	Takedown compliance (IT Act intermediary obligations)	No direct TRAI regulatory obligation

RECOMMENDATION: The regulatory framework should establish a primary duty of compliance on the Application Provider, with cascading contractual obligations flowing downstream to content providers and advertising partners. OEMs and OS providers should not be subject to direct TRAI licensing or authorisation.

4. Authorisation Framework

4.1 The Case Against a Licensing Regime

India's FAST ecosystem is nascent but growing rapidly. Imposing a licensing regime at this formative stage — modelled on DTH or cable frameworks — risks three outcomes: (i) deterring startup participation, (ii) creating artificial consolidation among well-capitalised incumbents, and (iii) raising the cost of content innovation.

By contrast, the UK's Ofcom framework treats FAST services as a category of 'on-demand programme services' with notification-based registration, not licensing. The United States imposes no federal licensing requirement on FAST platforms. South Korea and Australia employ a tiered notification model based on revenue thresholds. India should benchmark against these models, not against spectrum-era broadcast licensing.

4.2 Recommended Tiered Registration Framework

Tier	Criteria	Obligation	Fee
Tier 1 — Startup	Annual revenue < INR 5 Cr OR platform age < 3 years	Online self-declaration, basic KYC, grievance officer appointment	Nil
Tier 2 — Growth	Annual revenue INR 5–50 Cr	Registration + compliance self-certification + annual audit	Nominal (INR 1–2 Lakh)
Tier 3 — Established	Annual revenue > INR 50 Cr OR >1M MAUs	Full registration + quarterly reporting + compliance audit	Standard (TBD by TRAI)

- All tiers should operate under a single online portal (analogous to DoT's Saral Sanchar portal)
- Registration should be valid for 5 years with streamlined renewal
- No 'fit and proper' criteria beyond basic KYC and criminal record checks
- Foreign-invested ALTD platforms should follow the existing FDI policy for digital media (26% FDI in news; 100% in non-news)

RECOMMENDATION: TRAI should adopt a tiered, revenue-indexed registration framework rather than a licensing regime. The initial three years of framework operation should be treated as a 'regulatory learning period' with no punitive enforcement, to allow the ecosystem to organically mature.

5. Content Regulation

5.1 Applicability of Existing Codes

SWIFT TV supports the application of the Programme Code (Rule 6, Cable Television Networks Rules, 1994) and the Advertising Code (ASCI Code + Cable TV Advertisement Code) to ALTD services. These codes represent a reasonable, content-neutral baseline that safeguards consumers without imposing platform-specific creative restrictions.

5.2 Co-Regulatory Model — A Better Architecture

However, we strongly recommend against direct government enforcement as the first line of content moderation, for the following reasons:

- Internet-delivered linear content operates at a scale and velocity that makes government real-time monitoring technically infeasible
- Pre-censorship mandates are constitutionally vulnerable under Article 19(1)(a) as interpreted in *Shreya Singhal v. Union of India* (2015)
- International best practice (Ofcom, FCC) favours platform self-regulation with government oversight for escalations

We propose the following co-regulatory architecture:

Layer	Actor	Mechanism
Primary	ALTD Platform	In-app content flagging, AI-assisted moderation, CSAM screening, programme classification
Secondary	Industry Self-Regulatory Body (SRB)	Complaints panel, escalation protocol, cross-platform code of conduct
Tertiary	TRAI / MIB	Policy oversight, SRB accreditation, adjudication of unresolved complaints

- TRAI may consider establishing an ALTD Content Standards Council (ACSC) as an accredited SRB
- Age-gating mechanisms (PIN-based, Aadhaar-based age verification for 18+ content) should be mandated at the platform level
- A standardised Content Classification Schema (compatible with CBFC ratings and international equivalents) should be adopted for linear FAST channels

RECOMMENDATION: TRAI should adopt a co-regulatory model with platform self-regulation as the first layer, industry SRB as the second layer, and government oversight as the third layer. Mandatory pre-censorship or real-time government monitoring is not recommended.

6. Pay Channels on ALTD Platforms

ALTD platforms may, over time, seek to carry licensed pay channels — traditional broadcaster content delivered over IP rather than satellite or cable. This hybrid model already exists globally (e.g., YouTube TV, Hulu Live in the USA; Freeview in the UK). India's regulatory framework must proactively address this rather than leaving it as a grey area.

6.1 Recommended Channel Classification

- FAST-Native Channels: Originally created for FAST distribution; no broadcast licence required; governed by ALTD framework
- Migrated Linear Channels: Traditional broadcaster channels redistributed via IP; distribution rights must be explicitly licensed; broadcaster's existing content obligations apply
- Hybrid Channels: Channels that operate simultaneously on broadcast and FAST (simulcast); both broadcast and ALTD frameworks apply proportionately

6.2 Interoperability and Carriage Fee Concerns

Carriage fee disputes between ALTD platforms and broadcasters are brought within the ambit of TRAI's existing Interconnection Regulations or a new ALTD-specific interconnect framework. The absence of carriage fee norms may create asymmetric bargaining between large broadcasters and nascent FAST platforms, disadvantaging consumer access and market competition.

RECOMMENDATION: A clear channel classification taxonomy (FAST-native, migrated linear, hybrid simulcast) should be codified. Carriage fee and interconnection norms for migrated linear channels on ALTD platforms should be brought under TRAI's regulatory purview.

7. Consumer Protection

7.1 Core Consumer Rights in the ALTD Context

Consumers accessing ALTD services have distinct needs that differ from traditional broadcast audiences. The regulatory framework must address:

- Transparency: Clear labeling of ad-supported vs. subscription content; disclosure of data collection practices
- Content Accuracy: Accurate EPG (Electronic Programme Guide) data; no deceptive channel descriptions
- Ad Experience: Limits on ad-load frequency (recommended: no more than 4 minutes per 30-minute block); prohibition on auto-play ads without user opt-in
- Grievance Redressal: In-app complaint mechanism with acknowledgement within 48 hours and resolution within 15 working days (aligned with MIB OTT self-regulation guidelines)
- Accessibility: Closed captioning for content on major FAST channels; audio description for key programming

7.2 Vulnerable User Protections

- Mandatory parental controls with PIN-based access restriction for content rated UA12, UA16, or A
- Prohibition on targeting advertising to users identified as minors (aligned with DPDP Act Rule 10)
- Safe messaging guidelines for sensitive topics (mental health, violence, substance use) in FAST channel programming

RECOMMENDATION: Consumer protection norms for ALTD should be codified in a dedicated ALTD Consumer Charter, covering transparency, ad-load limits, grievance timelines, parental controls, and accessibility. Digital-first mechanisms (in-app, email, portal) should be the primary channels.

8. Data Governance

ALTD platforms generate significant first-party viewing data — channel preferences, watch time, content genre affinity, device type, viewing time-of-day. This data is the economic lifeblood of FAST platforms: it enables audience measurement, programmatic ad targeting, and content investment decisions. Overly restrictive data regulations at this stage would undermine the commercial viability of the FAST model in India.

8.1 Alignment with DPDP Act 2023

The Digital Personal Data Protection Act, 2023 already provides a comprehensive framework for data governance in India. ALTD-specific regulations should:

- Operate within, not duplicate, the DPDP Act framework
- Mandate consent banners and privacy notices compliant with DPDP Act Rules
- Permit anonymised and aggregated audience data for advertising and measurement purposes without additional regulatory restriction
- Prohibit cross-platform linkage of individual viewing data without explicit opt-in consent

8.2 Data Localisation

ALTD platforms should be required to store Indian user data on servers located in India (or in jurisdictions with adequate data protection equivalence under DPDP Act rules). This aligns with existing national data governance policy and provides law enforcement access, without imposing an undue technical burden on platforms.

RECOMMENDATION: Data governance for ALTD platforms should be governed by the DPDP Act 2023 without additional sector-specific data restrictions. Anonymised and aggregated viewing data should be freely usable for ad targeting and measurement. Data localisation for Indian user data is supported.

9. Audience Measurement

Television audience measurement in India has historically been dominated by BARC (Broadcast Audience Research Council), which measures traditional TV viewership through a panel-based

rating system. The FAST ecosystem operates on fundamentally different measurement principles — actual delivery data, not sampled panel data — and warrants a distinct measurement architecture.

9.1 Limitations of Applying TV Ratings to FAST

- BARC's panel (45,000 homes) is calibrated for terrestrial TV, not IP-delivered streams
- FAST channels are typically accessed on CTV devices, which BARC's current panel under-represents
- BARC ratings measure household-level viewership, while FAST platforms capture individual-level authenticated user data
- Imposing BARC-style panel measurement on FAST would devalue the superior first-party data that FAST platforms already possess

9.2 Recommended Measurement Framework

TRAI should encourage the development of a cross-platform audience measurement standard that:

- Recognises platform first-party data (impressions, unique viewers, watch time) as a valid currency for ad trading
- Establishes standardised data schemas for audience reporting (analogous to IAB Tech Lab's OpenRTB standards for digital advertising)
- Encourages voluntary industry participation in a CTV-specific measurement panel that complements BARC ratings
- Does not mandate BARC registration or panel-based ratings as a condition of operation for ALTD platforms

RECOMMENDATION: TRAI should commission a working group to develop a CTV/FAST audience measurement standard. Mandatory adoption of BARC panel ratings for ALTD platforms is not recommended. Platform first-party data should be formally recognised as a valid audience measurement currency.

10. Level Playing Field

Traditional distribution platforms — DTH operators, cable MSOs, and IPTV providers — have raised concerns about regulatory asymmetry with emerging ALTD/FAST services. These concerns are legitimate and deserve a structured policy response. However, the correct policy lever is rationalisation of existing broadcast regulations downward, not imposition of legacy obligations upward onto ALTD platforms.

10.1 Nature of Cost Asymmetry

Cost Component	DTH Operator	ALTD/FAST Platform
Spectrum / Orbital Slot	INR 100s of Crore (upfront & annual)	Nil
Set-Top Box Subsidy	INR 1,500–3,000 per subscriber	Nil
Carriage Fee to Broadcasters	INR 100s of Crore annually	Negotiated; often nil for FAST-native
Infrastructure (Transmission)	Satellite uplinking, transponder lease	CDN bandwidth (pay-per-use)
Content Regulation Compliance	Full Programme Code + BARC mandatory	Proposed: lighter co-regulatory model

The cost asymmetry between ALTD and traditional DPOs is fundamentally structural — rooted in differences in delivery technology — not regulatory. It cannot and should not be 'equalised' by loading legacy compliance costs onto ALTD platforms. Doing so would harm consumers (by raising FAST platforms' costs and pushing them toward subscription models) and harm the broader broadcast industry (by slowing the digital transition).

RECOMMENDATION: Regulatory parity should be achieved through rationalisation of legacy DPO obligations (reviewing spectrum fee structures, must-carry mandates, and BARC cost allocations), not through upward imposition of DPO-equivalent obligations on ALTD platforms.

11. Role of OEMs and OS Providers

Connected TV devices and their operating systems (Samsung Tizen, LG webOS, Google TV/Android TV, Amazon Fire TV) are the gatekeepers to the CTV viewing experience. Policies around app pre-installation, discoverability, and home screen placement have a direct bearing on competitive dynamics in the FAST ecosystem.

11.1 OEM-Level Competition Concerns

While SWIFT TV agrees that OEMs should not be directly licensed or regulated under the ALTD framework, TRAI should note two areas where OEM conduct affects ALTD market outcomes:

- **App Store Terms:** Discriminatory app review timelines, arbitrary rejection of FAST apps, or excessive revenue share demands (30% commission on in-app purchases) can disadvantage independent FAST operators
- **Home Screen Placement:** Preferential placement of OEM-owned or affiliated FAST applications (e.g., Samsung TV Plus on Samsung devices, LG Channels on LG devices) over third-party FAST platforms constitutes a potential self-preferencing concern

TRAI should refer these competition-related concerns to the Competition Commission of India (CCI) for examination under Section 4 of the Competition Act, 2002, rather than attempting to regulate OEM conduct directly through the ALTD framework.

RECOMMENDATION: OEMs and OS providers should not be subject to TRAI ALTD licensing or authorisation. However, TRAI should formally flag OEM app store terms and home screen self-preferencing practices to the Competition Commission of India for investigation under competition law.

12. Interoperability and Technical Standards

This is an area not addressed in SWIFT TV's initial submission but critical to the long-term health of India's ALTD ecosystem. Technical interoperability across devices, platforms, and ad ecosystems will determine whether FAST scales effectively.

12.1 EPG and Metadata Standards

Electronic Programme Guide (EPG) data — channel descriptions, programme schedules, content ratings, and genre classifications — is the backbone of the linear viewing experience. Currently, there are no mandated EPG standards for FAST channels in India, leading to inconsistent data quality across platforms.

- TRAI should work with MEITY and the Bureau of Indian Standards (BIS) to define a standardised EPG metadata schema for ALTD services
- The schema should include: channel name, content classification, synopsis, language, regional certification, and parental advisory flags
- Adoption should be mandatory for Tier 3 platforms and encouraged for Tier 1 and 2 platforms

12.2 Ad Technology Standards

Programmatic advertising on FAST platforms relies on standardised ad serving protocols (VAST, VMAP) and identity resolution frameworks. India-specific FAST ad standards should:

- Mandate VAST 4.1+ compliance for all linear ad insertions on ALTD platforms
- Encourage adoption of OpenRTB 3.0 for programmatic CTV inventory
- Establish a DPDP Act-compliant identity resolution standard to replace cookie-based tracking in the CTV environment

RECOMMENDATION: TRAI should initiate a Technical Standards Working Group for ALTD services, covering EPG metadata schemas, content classification codes, and ad technology standards. Mandating a baseline EPG standard and VAST 4.1+ ad serving compliance for Tier 3 platforms is recommended.

13. Emergency Broadcast Obligations

Emergency alert dissemination is a public safety obligation that has historically been embedded in traditional broadcast licensing. As ALTD platforms grow to serve millions of Indian households, they will increasingly serve as a primary information channel — particularly in tier-2 and tier-3 cities where CTV is replacing cable.

SWIFT TV recommends that the ALTD framework include a proportionate emergency broadcast obligation:

- Tier 3 platforms (>1M MAUs): Mandatory integration with the National Disaster Management Authority (NDMA)'s Common Alerting Protocol (CAP) system for real-time emergency alerts
- Tier 1 and 2 platforms: Best-effort emergency alert capability encouraged but not mandated
- Emergency alerts should be capable of overriding ongoing content streams, displayed as on-screen banners or audio interruptions

RECOMMENDATION: Emergency broadcast obligations should be included in the ALTD framework, scaled to platform size. Tier 3 platforms (>1M MAUs) should be required to integrate with NDMA's Common Alerting Protocol. Smaller platforms should adopt best-effort protocols.

14. Innovation and Regulatory Sandbox

The ALTD ecosystem is characterised by rapid innovation cycles — hybrid AVOD-SVOD models, shoppable TV, AI-curated channels, interactive programme formats, and live commerce integrations. Static regulatory frameworks risk becoming obsolete within 24–36 months of publication. TRAI must build adaptability into the framework from the outset.

14.1 Regulatory Sandbox Design

SWIFT TV proposes that TRAI establish a formal ALTD Regulatory Sandbox with the following design principles:

- Eligibility: Open to registered ALTD platforms, content technology startups, and CTV infrastructure companies
- Duration: 12-month sandbox window with 6-month extension option
- Exemptions: Sandbox participants receive time-bound exemptions from specific regulatory requirements (e.g., ad-load limits, EPG standards) during the testing period
- Reporting: Quarterly progress reports to TRAI; final sandbox report submitted at conclusion
- Graduation: Successful models graduate to mainstream framework with expedited compliance pathway

14.2 Review Mechanism

The ALTD regulatory framework should contain a mandatory sunset review clause: a structured review every 24 months to assess whether the framework remains fit for purpose in light of market developments, technology changes, and international regulatory evolution.

RECOMMENDATION: TRAI should establish a formal ALTD Regulatory Sandbox, open to platforms and startups, with time-bound regulatory exemptions during the testing period. The ALTD framework should contain a 24-month mandatory review clause to ensure continued relevance.

15. Taxation and Fiscal Framework

The consultation paper does not address the tax treatment of ALTD/FAST services. However, this is a material issue for FAST platforms, advertisers, and content providers. We flag two key concerns:

15.1 GST Classification

FAST platforms deliver a free-to-user, ad-supported service. The appropriate GST classification — whether as 'broadcasting services' (taxed at 18%), 'online information and database access' (OIDAR, 18%), or a distinct ad-supported media category — has material implications for platform economics. TRAI should recommend to the Ministry of Finance that a clarificatory circular be issued on the GST treatment of FAST platforms, distinguishing ad revenue from subscription revenue.

15.2 Platform Levy

Any platform levy on ALTD operators (analogous to the Universal Service Obligation levy on telecom operators) would need to be carefully calibrated. No platform levy should be imposed during the first five years of the ALTD framework. If a levy is subsequently considered, it should be capped at 0.5% of gross ad revenue for Tier 3 platforms, with Tier 1 and 2 platforms exempt.

RECOMMENDATION: TRAI should recommend fiscal clarity on the GST classification of FAST ad revenue. No platform levy should be imposed for the first 5 years of the ALTD framework. Any future levy should be capped and limited to Tier 3 platforms.

16. International Regulatory Benchmarking

India's ALTD framework should be informed by international regulatory approaches, while being calibrated to India's specific market conditions. The following table provides a comparative overview:

Jurisdiction	Regulator	FAST/ALTD Approach	Key Features
United States	FCC	Unregulated (no FAST-specific licence)	Voluntary industry codes; first-party data free to use
United Kingdom	Ofcom	On-Demand Programme Services (ODPS) — notification required	Code of Practice; co-regulation via ATVOD successor
European Union	AVMS Directive	Video Sharing Platforms framework applies	Upload filters, content moderation, age verification
Australia	ACMA	Online Safety Act + Broadcasting Services Act (notification)	Tiered by audience reach; co-regulatory codes
South Korea	KCC	Notification-based for OTT/FAST with revenue threshold	INR-equivalent ~INR 20 Cr threshold for full compliance
India (Proposed)	TRAI / MIB	Tiered registration, co-regulation, sandbox	This submission — see Sections 4, 5, 14 above

India has the opportunity to leapfrog legacy broadcast regulatory models and build a framework that is globally competitive. The UK's ODPS notification model and Australia's tiered approach offer the most relevant precedents for India's ALTD framework design.

17. Summary of Recommendations

The following table consolidates all recommendations in this submission:

Section	Topic	Recommendation
2	Definition	Standalone ALTD definition; separate category from DPO and OTT
3	Stakeholder	Application Provider as primary stakeholder; shared accountability model

Section	Topic	Recommendation
4	Authorisation	Tiered registration (3 tiers by revenue/MAU); no licensing regime
5	Content	Co-regulatory model: platform → SRB → TRAI/MIB; no pre-censorship
6	Pay Channels	3-tier channel taxonomy; carriage fee norms for migrated linear channels
7	Consumer Protection	ALTD Consumer Charter; ad-load limits; 48hr grievance acknowledgement
8	Data	DPDP Act alignment; anonymised data permitted; data localisation supported
9	Measurement	CTV measurement working group; platform first-party data as valid currency
10	Level Playing Field	Rationalise DPO obligations; do not impose DPO costs on ALTD
11	OEMs	No TRAI licensing for OEMs; refer competition concerns to CCI
12	Tech Standards	EPG metadata schema; VAST 4.1+ compliance for Tier 3 platforms
13	Emergency Alerts	NDMA CAP integration mandatory for Tier 3 (>1M MAUs) platforms
14	Sandbox	Formal ALTD Regulatory Sandbox; 24-month mandatory framework review
15	Taxation	GST clarity on FAST ad revenue; no platform levy for first 5 years

18. Conclusion

India's CTV and FAST ecosystem stands at the threshold of transformative growth. With over 800 million internet users, a rapidly expanding base of affordable smart TVs, and a world-class digital advertising industry, India has every prerequisite to become a global FAST powerhouse — producing and distributing Indian content to Indian and global audiences at scale.

SWIFT TV urges TRAI to seize this regulatory moment with confidence and vision. The framework you design today will determine whether India's FAST sector flourishes as a domestically rooted, globally competitive industry — or whether it is held back by compliance structures inherited from an earlier era of broadcast technology.

We recommend: a light-touch, tiered registration approach; a co-regulatory content governance model; strong but proportionate consumer protections; a formal sandbox for innovation; and a 24-month review cycle that ensures the framework evolves as the market does.

SWIFT TV is committed to working constructively with TRAI, the Ministry of Information and Broadcasting, and all ecosystem stakeholders to build a regulatory framework that serves consumers, enables innovation, and positions India's FAST sector as a model for emerging markets globally.

SWIFT TV

Abhishek Singh — Founder & CEO

Email: Abhishek.singh@thegermanemedia.com | Phone: +917632814293 | Website: playswift.tv