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Dr. Deepali Sharma,
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Tower F, NBCC World Trade Centre,
Nauroji Nagar,
New Delhi-110029

Subject: Tata Communications Limited's Response to TRAI Consultation on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services

Dear Madam,

This is with reference to the TRAI consultation dated 06-04-2026 titled, "**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 herewith Tata Communication Limited's response for your kind consideration as **Annexure**.

We earnestly request TRAI to kindly consider our submission while finalizing the Recommendations on the same. We would be happy to provide any additional information, if required.

Thanking You

Yours Sincerely,

Alka Selot Asthana
Global Head - Regulatory
Tata Communications Limited

Encl: as above

TATA COMMUNICATIONS

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**Tata Communications Limited's comments to TRAI Consultation Paper on
'Formulation of a Regulatory Framework for Application-based Linear Television
Distribution (ALTD) Services
(Including Free Ad-Supported Streaming Television (FAST) Services)'**

Preamble

Tata Communications Limited ("Tata Communications") welcomes the Telecom Regulatory Authority of India's (TRAI) consultation on *Application-based Linear Television Distribution (ALTD) services, including Free Ad-Supported Streaming Television (FAST)*. This consultation is timely and reflects the broader global evolution towards the convergence of traditional broadcast television and internet-delivered linear services, driven by advances in IP networks, connected TV devices, and cloud-based media workflows.

From a Tata Communications perspective, ALTD and FAST services represent an important next phase in the transformation of linear television distribution. These services increasingly blend characteristics of conventional broadcast televisions such as scheduled programming and live channels—with the flexibility, reach, and innovation enabled by internet delivery. This convergence necessitates a regulatory approach that recognises differences in technology, scale, and business models, rather than one that mechanically extends legacy cable or Distribution Platform Operator (DPO) obligations to application-based platforms.

Tata Communications is a licensed Teleport Service Provider and global media infrastructure provider, enabling content origination, satellite uplinking, contribution, distribution, cloud-based playout, IP delivery, and hybrid broadcast-IP workflows for broadcasters, content owners, and digital platforms worldwide. While ALTD and FAST services are accessed via applications, their operational backbone, particularly for live linear channels, international content feeds, redundancy, and service reliability, continues to rely on robust teleport, satellite, and managed media infrastructure.

In our view, any regulatory framework for ALTD and FAST services should be proportionate, technology-agnostic, and forward-looking. Regulation should focus on clearly defined areas of operational accountability—such as content authorisation, piracy and security controls, consumer grievance redressal mechanisms, service transparency, and baseline quality-of-service expectations—without introducing prescriptive or structural requirements developed for earlier broadcast eras. Importantly, the framework should preserve flexibility for innovation and avoid the creation of India-specific obligations that could fragment global OTT, connected TV, device, or content ecosystems.

However, we also note that the growth of such services has direct and indirect implications for licensed teleport service providers, particularly with respect to:

- Regulatory parity between satellite-based and application-based linear distribution
- Clarity on content origination, uplinking, and signal chain responsibilities
- Investment incentives for maintaining critical teleport infrastructure
- Continued compliance with security, monitoring, and lawful interception obligations

In this context, Tata Communications believes that any regulatory framework for ALTD and FAST services should be technology-agnostic, proportionate, and outcome-focused, recognising the convergent nature of broadcast and IP delivery while avoiding regulatory asymmetries that may inadvertently disadvantage licensed infrastructure providers or discourage investment in resilient broadcast systems.

Further, given the increasing use of hybrid delivery models—where satellite teleports coexist with cloud playout and IP distribution—it is essential that regulatory approaches continue to support innovation without undermining critical national broadcast infrastructure, which plays a foundational role in live content distribution, disaster communications, and public interest broadcasting.

In our considered view, if approached pragmatically, the evolution of ALTD and FAST services presents a meaningful opportunity for managed media infrastructure and operational service providers. As these services scale and become more operationally accountable, platforms will increasingly require capabilities such as channel origination and playout, compliance recording and logging, real-time monitoring, ad insertion, DRM and security controls, hybrid IP delivery, audience measurement integration, and 24x7 managed operations support.

Therefore, there is an immense need for enabling a balanced regulatory framework that protects consumer interests, supports innovation, and sustains long-term investment in India's media and distribution ecosystem. Our responses to the consultation are guided by the principles of:

- Supporting innovation and platform diversity
- Ensuring regulatory clarity and parity across comparable linear services
- Protecting consumer interests and content integrity
- Sustaining investment in teleport and broadcast infrastructure as strategic national assets

We trust that our submissions will assist TRAI in developing a balanced and future-ready regulatory framework for ALTD and FAST services, aligned with India's objectives of promoting digital media growth while preserving the stability and resilience of its broadcasting and teleport ecosystem.

In view of above context, please find below **Tata Communications question-wise response.**

Q1. 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.

Tata Communications Response:

Tata Communications submits that Application-based Linear Television Distribution (ALTD) Services should be defined in a technology-neutral and proportionate manner, reflecting their functional characteristics while recognising their distinction from traditional cable and satellite-based distribution platforms.

While consumer access is IP-based, such services often rely on licensed teleport and broadcast infrastructure for content origination, live feeds, redundancy, and international distribution. Accordingly, the scope of ALTD services should be function-based and technology-neutral, clearly distinguished from traditional cable DPOs, and aligned with international terminology such as FAST and IP-delivered linear TV, without extending legacy broadcast obligations onto application-based platforms.

Q2. 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.**

Tata Communications Response:

In our view, the Application Provider should be designated as the primary stakeholder responsible for obtaining authorisation for provisioning ALTD Services, as it exercises principal control over channel aggregation, service presentation, consumer interface, and monetisation.

Other ecosystem participants—including teleports, broadcasters, content providers, OEMs, and technology service providers—play enabling or upstream roles (such as content origination, contribution, or infrastructure support) and typically operate under separate, existing licences or contractual arrangements. Assigning authorisation responsibility to the Application Provider ensures clear accountability while avoiding regulatory overlap or duplication for licensed infrastructure providers such as Teleport Service Providers.

Q3. 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?

Tata Communications Response:

The terms and conditions for granting authorisation to Application Providers provisioning ALTD Services should be light-touch, proportionate, and aligned with the internet-based nature of these services, avoiding replication of legacy cable/DPO frameworks.

- Service Area: Pan-India authorisation; no city or state-wise fragmentation
- Validity Period: Long-term validity (10–20 years) with simple renewal to encourage investment
- Eligibility: Incorporation or registration under applicable Indian law, or compliance with prescribed conditions for foreign entities operating through an authorised Indian presence, in line with extant FDI and national security norms.
- Net Worth: Reasonable thresholds, commensurate with digital platform operations
- Fees (processing, entry, authorisation): Nominal, cost-based fees to avoid entry barriers
- Bank Guarantee/Security Deposit: Minimal and risk-based, not capital-intensive
- Roll-out Obligations: No mandatory roll-out timelines; market-driven deployment preferred

Overall, authorisation conditions should focus on accountability and transparency, rather than infrastructure-heavy compliance, as ALTD services do not rely on exclusive spectrum or last-mile control.

Q4. 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**

Tata Communications Response:

It is reiterated that the common terms and conditions applicable to authorised ALTD service providers should be simple, technology-neutral, and proportionate, ensuring accountability without replicating legacy broadcast or DPO frameworks.

- Renewal of Authorisation & Renewal Fee: Renewal should be automatic or light-touch, with nominal, cost-based renewal fees.

- Equity Holding & Management Control: Existing FDI and corporate governance norms applicable to digital services should apply; no additional sector-specific restrictions are required.
- Cross-holding Restrictions: Any restrictions on cross-holding between broadcasters, ALTD application providers, and other distribution service providers should be limited and targeted only to address demonstrable competition or consumer harm concerns, without constraining innovation or commercial partnerships.
- Transfer/Surrender of Authorisation: Transfers and surrender should be permitted with prior intimation or approval, ensuring continuity of service and regulatory transparency.
- Sharing of Infrastructure: Infrastructure sharing (including teleports, cloud media platforms, and delivery networks) should be expressly permitted to promote efficiency, resilience, and cost optimisation.
- Other Conditions: Obligations should focus on content authorisation, security against piracy, consumer grievance redressal, transparency, and cooperation with lawful requirements, avoiding prescriptive operational mandates.

Overall, Tata Communications recommends a principles-based common framework that supports innovation in ALTD/FAST services while enabling continued use of licensed teleport and broadcast infrastructure as part of hybrid delivery models.

Q5. 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:

- 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 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.

Tata Communications Response:

Tata Communications submits that the specific terms and conditions applicable to authorised ALTD service providers should remain proportionate, technology-neutral, and aligned with the application-based delivery model.

Mandatory reservation of operational channel capacity by vertically integrated entities should not be prescribed, as ALTD platforms rely on competitive application-based environments while content origination, live feeds, resilience, and international distribution continue to depend on

licensed teleport and broadcast infrastructure. Application providers should be permitted to offer platform services subject to transparency and non-discrimination, while monitoring and inspection obligations should focus on service-level compliance, security, and lawful interception coordination, rather than intrusive physical inspections inappropriate for cloud-based or teleport-integrated operations. Information supply to the Government/TRAI should be relevant and proportionate, and enforcement for contravention should follow graded, corrective mechanisms. Importantly, legacy obligations such as mandatory sports signal sharing with Prasar Bharati and compulsory carriage requirements applicable to DTH, HITS, and IPTV should not be extended to ALTD services, as such obligations could undermine investment in licensed teleport infrastructure and constrain innovation in converged satellite-IP television delivery.

Q6. 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.

Tata Communications Response:

Tata Communications submits that a light-touch assurance mechanism should be prescribed whereby television manufacturers and operating system providers ensure that only applications provisioning ALTD services that are duly authorised by MIB are made available on devices or application stores. This may be implemented through periodic access to an MIB-maintained authorisation registry or API-based validation, supported by self-declaration and audit-based compliance, without imposing certification or licensing obligations on device manufacturers or OS providers, so as to avoid operational complexity and ecosystem fragmentation.

Q7. 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/permitted by MIB for distribution in India. What kind of penalty/disincentive/deterrent be instituted for non-compliance? Provide your comments with justification.

Tata Communications Response:

It is submitted that the assurance should be ensured through a light-touch, registry-based mechanism whereby authorised ALTD application providers are required to integrate against an MIB-maintained list (or API) of permitted channels for distribution in India, supported by periodic self-certification and audit-based compliance. This approach ensures accountability without imposing heavy pre-certification controls that may hinder innovation.

For non-compliance, a graded and proportionate enforcement framework should apply starting with corrective directions and penalties, escalating to suspension or withdrawal of authorisation in cases of repeated or willful violations, thereby acting as an effective deterrent while preserving ecosystem stability and continued investment in licensed teleport and broadcast infrastructure.

Q8. 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.

Tata Communications Response:

We submit that there is no need to prescribe overly restrictive or standalone regulatory conditions for value added services offered by ALTD service providers.

Any terms and conditions should be limited to ensuring transparency, consumer protection, security, and lawful compliance, without constraining innovation or bundled service models. Value added services—such as enhanced advertising, personalisation, analytics, or interactive features—should remain market driven and subject only to general obligations relating to disclosure, data protection, content authorisation, and non-discrimination, while avoiding legacy broadcast specific controls that could impede the evolution of IP based and hybrid satellite IP television ecosystems.

Q9. 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.

Tata Communications Response:

In our considered view, broadcasters or content owners distributing television channels on ALTD platforms should not be mandatorily required to obtain separate satellite-based or ground-based broadcasting authorisations solely for ALTD distribution, provided the channels are not directly uplinked or delivered to consumers through those broadcast modes.

ALTD services are application-based and IP-delivered, and mandating legacy broadcast authorisations would introduce regulatory duplication and entry barriers without commensurate public interest benefit. However, where broadcasters continue to use licensed satellite uplinking or teleport facilities for content origination or international feeds, such activities should remain subject to existing satellite/teleport authorisation requirements.

A clear functional distinction between content origination infrastructure and application-based distribution will ensure regulatory clarity while supporting innovation and hybrid broadcast-IP delivery models.

Q10. 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.

Tata Communications Response:

We submit that price parity for pay television channels on ALTD platforms should be addressed through a market-driven, principle-based approach rather than prescriptive retail tariff regulation.

Broadcasters should offer channels to ALTD platforms on fair and non-discriminatory wholesale terms, while application providers should retain flexibility in retail pricing, bundling, and hybrid free/paid models, reflecting their IP-based cost structures and advertising-led monetisation. Regulatory focus should be on transparency and non-misleading pricing disclosures, rather than enforcing identical consumer pricing across platforms, as rigid parity requirements could distort competition and constrain innovation in hybrid broadcast-IP and teleport-enabled delivery ecosystems.

Q11. 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.

Tata Communications Response:

The authorised ALTD service providers should be subject to clear but proportionate consumer protection and grievance redressal obligations that are uniformly applicable across all access modes (smart TVs, websites, mobile apps, and connected devices). Such obligations should include transparent disclosure of service terms, channel availability, and pricing/advertising models (where applicable), establishment of a single, easily accessible grievance redressal mechanism with defined timelines for acknowledgment and resolution, and nodal contact details for escalation.

ALTD providers should also ensure device-agnostic grievance access (e.g., in-app, web-based, or call/email support) and compliance with applicable data protection, security, and content authorisation requirements. These measures will ensure consumer protection and accountability without imposing legacy broadcast-centric conditions that are unsuitable for application-based and hybrid broadcast-IP delivery ecosystems.

Q12 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.

Tata Communications Response:

Tata Communications submits that integration of ALTD service data into the television ratings framework should follow a convergent, platform-agnostic methodology that captures linear viewing across satellite, cable, IPTV, and application-based ALTD/FAST services in a unified manner. Audience measurement should be based on a combination of panel-based measurement (for consistency and benchmarking) and secure, anonymised return-path data from ALTD

platforms, subject to transparency, auditability, and privacy safeguards. Integration should focus on viewership of linear channels, irrespective of delivery mode, to ensure comparability with traditional television ratings.

We recommend a phased implementation approach, beginning with pilot integration of ALTD data alongside existing ratings within 12–18 months, followed by full harmonisation once data standards, validation mechanisms, and stakeholder confidence are established, so as to preserve rating integrity while enabling accurate measurement of evolving hybrid broadcast-IP television consumption.

Q13 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.

Tata Communications Response:

The enablement for television distribution platforms and OTT platforms to publish periodic viewership data without prior registration can be aligned with the ALTD authorisation framework by clearly distinguishing between *publication of aggregated viewership statistics* and *regulated audience measurement services*.

Authorised ALTD application providers may be permitted to publish high-level, non-commercial viewership insights on their platforms, subject to basic principles of transparency, accuracy, and consumer privacy, and without such publication being construed as formal ratings or measurement activity. Any such disclosure should be clearly labelled as platform-specific analytics, avoid misrepresentation as industry-wide ratings, and remain subject to audit or verification if required by the regulator. This approach preserves flexibility and innovation for ALTD platforms, avoids regulatory duplication, and remains consistent with the proposed authorisation framework, while ensuring that formal television ratings continue to be governed under the designated audience measurement architecture.

Q14 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.

Tata Communications Response:

It is reiterated that the ALTD service providers adopting hybrid business models (free and/or paid) should be subject to a light-touch, technology-neutral regulatory framework. Tariff regulation should not be prescribed ex-ante; instead, pricing for paid services should remain market-driven, with clear disclosures to consumers on subscription terms, advertising load, and service features.

Interconnection arrangements, particularly those relating to content contribution, teleport usage, and IP delivery, should continue to be governed by mutual commercial agreements, without mandatory interconnection obligations, as ALTD platforms do not control last-mile access or bottleneck facilities. Quality of Service (QoS) requirements, if any, should be limited to baseline service transparency (e.g., availability, latency expectations, and content continuity) rather than prescriptive performance benchmarks, recognising the dependence of IP-based services on best-effort networks. Such an approach will ensure consumer protection and accountability while preserving flexibility for innovation and investment in hybrid broadcast-IP and teleport-supported delivery models.

Q15 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.

Tata Communications Response:

Tata Communications submits that while formulating the regulatory framework for ALTD services, certain additional issues merit consideration beyond those explicitly covered in the consultation. These include transparency and non-discrimination in channel positioning on home screens and EPGs, clarity in commercial arrangements such as revenue-sharing, marketing, and placement agreements, and flexibility in interconnection terms governing content contribution and delivery, including use of licensed teleport and managed media infrastructure.

International best practices generally avoid prescriptive regulation in these areas, instead relying on competition law, transparency obligations, and ex-post dispute resolution, recognising the dynamic and platform-driven nature of application-based services. Adopting a similar principles-based approach in India would help prevent undue regulatory intervention in commercial design choices, support innovation, and ensure alignment with global ALTD/FAST ecosystems while safeguarding fair competition and consumer interests.