

Based on the \*\*TRAI Consultation Paper No. 02/2026\*\*, the following are structured views and comments regarding the proposed regulatory framework for \*\*Application-based Linear Television Distribution (ALTD)\*\* and \*\*FAST\*\* services by Upobhokta Sanrakshan Kalyan Samiti, Kanpur CAG

### 1. Definition and Scope of 'ALTD Services'

**Broadening the Scope:** The proposal to use "ALTD" as an umbrella term is forward-looking because it covers any application distributing linear TV channels, regardless of whether they are free (FAST) or subscription-based.

**Form-Factor Agnosticism Regulations should be device-neutral** Whether a consumer watches a linear channel on a smart TV, smartphone, tablet, or laptop, the same regulatory standards for content and distribution should apply to ensure consistency.

### 2. Licensing and "Level Playing Field"

**Parity with Traditional DPOs:** Currently, traditional operators like Cable and DTH are heavily regulated, while ALTD platforms operate with little oversight. To ensure a level playing field, ALTD providers should obtain a separate service authorisation under the "Television Channel Distribution Services" category.

**Indian Presence:** Given that broadcasting is a strategic sector for public opinion, it is advisable that only \*\*Indian owned and controlled entities be eligible for authorisation. This ensures accountability for content compliance and legal enforcement.

### 3. Content Accountability and Authorisation

**Mandatory Channel Registration:** A major concern is the proliferation of "unpermitted" channels on FAST platforms. All linear channels on ALTD platforms should be mandated to obtain valid uplinking/downlinking or ground-based broadcasting permissions from the Ministry of Information and Broadcasting (MIB).

**Code Compliance:** ALTD platforms must be held responsible for ensuring that all distributed content strictly adheres to the Programme Code and Advertising Code

### 4. Pricing and Tariff Parity

**Uniform Pricing** There is currently a "regulatory arbitrage" where channels sold as "Pay Channels" on traditional platforms are offered for free on ALTD apps.

**Proposed View** A channel's status (Pay vs. FTA) should be uniform across all platforms. If a channel is declared "Pay," it should not be offered for free on an unregulated digital

platform, as this devalues the content and unfairly discriminates against traditional subscribers.

#### 5. Consumer Protection

**Grievance Redressal** Consumers often face confusion regarding whom to contact for service issues on smart TVs—the manufacturer, the app provider, or the broadcaster.

**Recommendation Authorised** ALTD entities should be mandated to provide a transparent, time-bound grievance redressal mechanism within the application interface.

#### 6. Audience Measurement

Viewership is fragmenting across traditional and digital modes. To provide a true picture of the market, audience measurement should be technology-neutral capturing data from connected TVs and OTT apps alongside traditional cable and DTH.