

To,  
Dr. Deepali Sharma,  
Advisor (B&CS),  
Telecom Regulatory Authority of India,

Ref: Consultation Paper on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services) 06th April 2026.

Subject: Our Comments on the Consultation Paper referred above.

Dear Madam,

Ucast Media Private Limited is an MSO having DAS license No.N-450009/52/2020-DAS dated 10/11/2020. Since then we operating only IPTV services in India as per M.I.B guidelines and TRAI Regulations.

I wish to bring to your kind notice about illegal usage of M.I.B Licensed channels on OTT Apps and Television sets which is causing huge revenue loss to the licensed IPTV providers, Digital Cable TV Providers and the whole Broadcasting Sector.

Brief Summary of the current Status of distribution of Licensed Satellite TV Channels in India.

No.	Licensed DPO	Unlicensed Distributor
1	Compliance and Subscriptions Audits as TRAI guidelines are to be conducted as per schedule	Not Required
2	Broadcaster RIO agreements as per TRAI interconnection regulation which includes Price List as per TRAI guidelines	20% to 50% of cost from OTT services compared to TRAI Price List.
3	IPTV Operator can distribute only within partners network and cannot distribute in internet cloud.	They are distributing in internet cloud without any Exclusive last mile expenditure.
4	IPTV Operators cannot include any OTT content in their application.	They are including the OTT and Linear satellite channels both in the same application and sourcing the content from cheaper sources.
5	FTA Channels also are required to be encrypted and accounted and not authorized to distribute in internet.	FTA is openly distributed in internet cloud and integrated with OTT apps

Distribution of Satellite channels without any DPO license is causing huge revenue losses to Licensed DPO. Since there is no penal action taken as per the prevailing law MSO licensees are closing their operations and some of them are operating as unauthorized distributors using OTT platform.

I request you to review and consider all the above facts and provide relief to licensed IPTV MSOs and enable them with required privilege instead of discrimination against the unlicensed service providers of M.I.B licensed channels.

As a stake holder we are submitting our written comments in reply to the consultation paper No.02/2026 issued on 6<sup>th</sup> April 2026.

Our reply to each question is individually drafted below each question.

**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.**

- a) The ALTD Services offered by various providers now include not only Live Television Channels (which are classified as Linear Television channels) but also other contents like Video on Demand, highlighted news clips, time shifted linear television channels.
- b) The same entertainment and movies content available in the M.I.B licensed Television Channels are offered in the form of Video On Demand services.

Considering the above facts it may be appropriate to modify the 'ALTD Services' as "Application-based Media Services" AMS. The term Television is omitted since services provided by the OTT app providers is not limited to television and they are offering the same in Mobile, Tablet and computers.

**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.

- a) No.
- b) Only Distribution Platform Operators should be the primary stake holder for obtaining authorisation for provision of ALTD Services.
  - 1) The DPOs are already licensed by M.I.B and regulated by TRAI.
  - 2) **THE TELECOMMUNICATION (BROADCASTING AND CABLE) SERVICES INTERCONNECTION (ADDRESSABLE SYSTEMS) (FIFTH AMENDMENT) REGULATIONS, 2023. Schedule-X** for regulating the IPTV services under DPO license should be amended to provide ALTD Services.

**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 covering, though not limited to, the following conditions:**

- a. **Service Area** – All India
- b. **Validity Period** – Same as DPO license
- c. **Eligibility Conditions** – Existing MSO license holders and for new applicants Private/Public Limited Company may be insisted similar to ISP.

- d. **Minimum Net worth** – Existing MSO License terms
- e. **Processing Fee** – Existing MSO license terms
- f. **Entry Fee** – Existing MSO terms
- g. **Bank Guarantee** – Existing MSO license terms.
- h. **Authorisation Fee** – Existing MSO license terms.
- i. **Security Deposit** – Existing MSO license terms.
- j. **Roll Out Obligations** – Amended Schedule – X Audit certification by empanelled Auditors.
- k. **Any other terms and conditions** – The Unlicensed distribution of M.I.B licensed channels should be stopped with immediate effect since it is a major violation of regulation and creating a non-level playing field for the licensed DPOs

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

The TERMS should be similar to INTERNET SERVICE PROVIDERS.

**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** – Existing IPTV DPO terms
- b. **Renewal Fee** – Existing IPTV DPO Terms
- c. **Equity Holding and Management Control** – Existing ISP Terms
- d. **Restriction on cross-holding of equity shares/capital contribution between**
  - i. **TV broadcasters and application providers provisioning ALTD services** – No comment
  - ii. **Application Providers provisioning ALTD services and other DSPs** – No comment
- e. **Transfer/Surrender of Service Authorisation** – Transfer of license is not permitted – surrender can be accepted as per Existing MSO terms.
- f. **Sharing of Infrastructure** - To be permitted only for Headend Infrastructure which includes satellite TVRO Antennas, Broadcaster Decoders, Transcoders, Encoders, IRD and similar equipment, Subscriber Management System, Digital Rights Management, Application Server, Consumer Application should be set-up Individually.
- g. **Any other terms and conditions** – Insertion of DPO Logo should be allowed at the Application Level since it is a secured option unlike the logo in the STB of Digital Cable TV or DTH. This option will facilitate each DPO to have individual logo in the live channel in Infrastructure sharing option. The service of each DPO can be identified even when the same HEADEND infrastructure is used by multiple DPOs.

**Q5. What should be the specific terms and conditions applicable for the authorised entities provisioning 'ALTD Services' in India, under the 'Television Channel Distribution Services' as recommended in Part-II of Annexure-III in 'Authorisation Recommendations dated 21st February 2025'? Stakeholders are requested to provide their detailed comments on the following conditions:**

- a. **Reservation of operational channel capacity by Vertically Integrated Entity** – Capacity to be provisioned for All Licensed Channels of M.I.B ( IPTV )
- b. **Platform Services (PS) offered by application providers provisioning ALTD services** – 10% of the existing M.I.B licensed channels available in the Network.
- c. **Monitoring and Inspection of facilities** – Existing DPO Guidelines.
- d. **Supply of Information to Central Government/TRAI** – Existing DPO Guidelines.
- e. **Contravention of terms and conditions of authorisation** – Broadcasters having OTT distribution of the content which is available in their Linear Channels provided to the DPO should share the same OTT content to the IPTV MSO also under the same rates and discount structure they are operating in the

**Head Office:** #709, 7<sup>th</sup> Floor, Aditya Trade Center, Ameerpet, Hyderabad, Telangana – 500 038.

**GSTIN:** 36AAFCC8370D1ZP | **CIN No:** U72200TG2014PTC096281 | **Call:** +91-74164 10222 | **Web:** [www.ulka.tv](http://www.ulka.tv)

market. Additional discount to the DPO is recommended if DPO is capable of providing the CDN infrastructure to the broadcaster for their OTT service which save the distribution cost to the broadcaster who is paying to the global CDN providers mostly Akamai and Amazon.

**f. Any other terms and conditions** – Ground based IP network distribution from the broadcasters to the DPO headend option should be allowed.

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

Mandatory sharing of Sports Broadcasting Signals with Prasar Bharati should not be allowed. If allowed only SD Standard Definition in Black and White with time delay of 30 minutes should be followed.

**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.**

The Major Device Manufacturers are currently, Samsung TV, LG TV, Fire TV, Television Sets using Android / Google TV operating system. The above said operating system setup their own proprietary Application servers and offer via their APP store / Play Store. They verify only the application provider credentials. The regulator has to mandate them to verify license issued by M.I.B for approving IPTV applications on their platforms.

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

Only the licensed DPO is authorized to distribute the channels authorised/permited by M.I.B for distribution in India. The DPO license should be suspended till they withdraw the distribution of unlicensed channels and after 3 violations their license can be cancelled permanently.

**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.**

Time-shifted Linear Channels, VOD (Video on Demand) and OTT content from the broadcasters who is already having RIO agreement with the DPO should be allowed by the DPO for distribution in their application.

**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.**

Yes

The Broadcasters/Content Providers having the Downlinking license from the M.I.B should be allowed to distribute Ground-based Broadcasting also including their VOD content available in their linear channels only via licensed DPO platforms. For the VOD content the broadcasters can optionally use their own subscription system instead of DPO subscription system which can avoid subscription Audit of the additional services.

**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.**

The Pricing of linear channels should be same for satellite and ground-based distribution system. For the additional services of VOD/time shifted content it is better to leave the decision to the content owner as per the market demand and acceptance.

**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.**

The same obligations of the current DPO terms and Conditions. The redistribution system via ISP or the LCO network is key in providing proper network connectivity to the consumer. The network obligations should be assigned to the network operator. The consumer should be allowed to migrate to a different network provider in case the service is not satisfactory with the existing network provider.

**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.**

IPTV is a two-way network and provide actual viewership of the consumers. All the IPTV providers will be having the session logs of DRM license tokens. These token analysis can be shared for viewer ship analysis which provides 100% sampling of the IPTV subscribers in place of current ratings which are based on much less than 1% samplings.

**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.**

The viewership analysis available with the IPTV MSO can be included in the technical audit of the MSO and if it is approved by the auditor DPO can share the information as per his requirement.

**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.**

The Broadcasters are offering all their content for a fixed price in OTT. The interconnection regulation does not permit them to offer the same system to the DPO. The regulatory restriction of bouquet

Head Office: #709, 7<sup>th</sup> Floor, Aditya Trade Center, Ameerpet, Hyderabad, Telangana – 500 038.

GSTIN: 36AAFCC8370D1ZP | CIN No: U72200TG2014PTC096281 | Call: +91-74164 10222 | Web: [www.ulka.tv](http://www.ulka.tv)

pricing against ala-carte is forcing the broadcaster to promote their content on their OTT platform. By providing this option to the broadcaster it should be mandatory for the broadcaster to offer the same or less price to DPO compared to their OTT platforms. This is justified since the DPO is providing the network infrastructure to the subscribers and in case of Broadcaster distributing via OTT has to pay to the CDN network providers who are global players like amazon and akamai. The broadcaster savings of expenses to the global CDN network providers can be passed to the IPTV MSO who setup their own CDN network infrastructure. The CDN infrastructure created by IPTV MSO is the solution for the content distribution monopoly of the global cdn providers.

**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.**

The major global content player Google offers free content on their Youtube platform which is a major loss to the broadcasting industry. This business opportunity is available to them since consumer addressability is available in the internet distribution. This is diverting major advertisement revenue from the linear channel providers to free content providers like Youtube, Facebook etc. IPTV MSO can provide the API to the broadcaster for similar addressability and viewership analysis of the subscribers to the broadcasters. By exploiting this consumer addressability the broadcasters can increase their advertisement revenue to a great extent and compete global OTT content player and share the same revenue to the IPTV MSO. This enables the echo system to provide low cost or free content to the subscribers.

Explanation of the above advertisement system.

The current broadcaster advertisement system the advertisement is broadcasted to 100% of the their subscribers all Indian.

The IPTV distribution can have option of CDN / region wise based advertisement. ISP network-based advertisements and individual subscriber-based advertisement.

I would like to thank TRAI for providing us the opportunity to provide our concerns and views regarding the IPTV distribution and existing OTT provider services which are overlapping and creating a unhealthy competition to the licensed IPTV service providers in India.

Thanking you,

Regards,

S Raghava Rao

Director

Ucast Media Private Limited. Contact [srrao@ulka.tv](mailto:srrao@ulka.tv), Ph.9848028638