

By E-Mail



11.05.2026

To,
Telecom Regulatory Authority of India
World Trade Centre,
4th, 5th, 6th & 7th Floor,
Tower F, Nauroji Nagar,
New Delhi - 110029

Kind Attn: Dr. Deepali Sharma – Advisor (B&CS)

Subject: Comments on behalf of Zee Entertainment Enterprises Limited (“ZEEL”) to the Consultation Paper on formulation of a Regulatory Framework for Application – based Linear Television Distribution (ALTD) Services (including Free Ad supported streaming Television (FAST) Services) dated 06.04.2026

Dear Madam,

At the outset, Zee Entertainment Enterprises Limited places on record its appreciation for the Telecom Regulatory Authority of India (TRAI) for initiating the consultation on the “Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (including Free Ad-Supported Streaming Television (FAST) Services)” dated 6th April 2026. The present consultation is both timely and necessary in view of the evolving technological landscape and the increasing convergence of broadcasting and digital distribution ecosystems.

TRAI’s regulatory interventions over the years have contributed towards establishing a framework governing various segments of the broadcasting and distribution value chain. While these measures have addressed several aspects of market functioning, certain structural and regulatory imbalances continue to persist, as have been highlighted by stakeholders from time to time. These unresolved issues assume greater significance in the context of emerging distribution models.

The rapid proliferation of internet-enabled content delivery platforms has led to a fundamental shift in the manner in which television content is being accessed and consumed. Application-based platforms are increasingly offering linear television-like services, often indistinguishable from traditional broadcasting from a consumer standpoint and are witnessing substantial scale and adoption. However, such services, in several instances, continue to operate outside the scope of the existing regulatory framework applicable to licensed platforms, thereby resulting in regulatory asymmetry and non level playing field for the licensed platforms.

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It is pertinent to note that licensed and regulated platforms are subject to comprehensive obligations, including adherence to Programme and Advertising Codes, consumer protection frameworks, tariff and interconnection regulations, as well as mandatory carriage of public service broadcasting content in furtherance of larger public policy objectives. In contrast, the absence of commensurate obligations for ALTD/FAST/other platforms creates a situation of regulatory arbitrage, which has implications for fair competition, content governance and equitable market development.

Further, the availability of content on such platforms without adherence to extant regulatory provisions raises important concerns regarding price parity, content authorisation and compliance with established policy frameworks. These developments, if left unaddressed, may distort the level playing field between regulated and unregulated entities in favour of unregulated entities and impact the long-term sustainability of the broadcasting ecosystem.

In view of the above, it is imperative that a comprehensive and appropriately calibrated regulatory framework is put in place to address the evolving nature of ALTD services. Such a framework should ensure parity in regulatory obligations for functionally similar services, while being mindful of technological innovation and consumer interests.

The present consultation, therefore, provides a critical opportunity to holistically examine these issues and to bring about regulatory clarity and alignment across platforms. Zee Entertainment Enterprises Limited welcomes this initiative and is pleased to submit its comments on the issues raised in the consultation paper.

We respectfully request the Authority to consider the submissions provided herein below, with a view to addressing the existing regulatory gaps and ensuring a fair, transparent and balanced ecosystem for all stakeholders for the orderly growth of the sector.

Thanking you.

Yours sincerely,

For **Zee Entertainment Enterprises Limited**


Authorised Signatory

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ZEEL's Response to the consultation paper on Formulation of a Regulatory Framework for Application-based Linear Television Distribution (ALTD) Services (Including Free Ad-Supported Streaming Television (FAST) Services)

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.

Response:

Definition of Linear Television Channel

- A Linear Television Channel means a channel, which has been granted permission for downlinking by the Central Government under the policy guidelines issued or amended by it from time to time and reference to the term 'channel' shall be construed as a reference to "television channel", in which content is:
 - Transmitted in real time according to a predefined schedule.
 - Received by viewers simultaneously as it is being broadcast.
- The defining feature of a linear channel is continuous and real-time transmission for all the viewers.
- All such channels which do not fall in this category should not be allowed to operate in India on any platform.

Definition of ALTD

- Application-based Linear Television Distribution (ALTD) Services should be defined as services that distribute linear television channels to consumers through applications or web-based platforms over the internet while retaining the original definition of the Linear Television Channel.
- Such services should be recognised as replicating traditional linear television viewing on digital platforms and should not be clubbed with OTT Services. ALTD apps should be distinct from open OTT services, ensuring secure delivery to subscribers.
- ALTD can have two sections, Free and Pay, based on the model chosen by the Broadcasters.

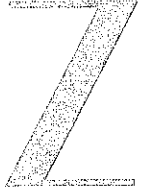
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Justification

- ALTD Services perform the same essential function as traditional television distribution, namely the delivery of permitted linear television channels to consumers.
- A definition that is technology-neutral, form-factor agnostic and future-ready and focuses on the nature of the service (distribution of linear television channels) rather than the delivery medium, ensures regulatory clarity, parity and consistency across platforms, while preventing regulatory ambiguity as technologies evolve.
- On-demand OTT services differ fundamentally with Linear Television Channels in nature, as they provide content based on user choice and do not involve scheduled programming or continuous linear streams, hence they do not replicate traditional television viewing.

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.**

Response:

- Yes, the Application Provider should be designated as the primary stakeholder responsible for obtaining authorisation for the provisioning of ALTD Services.
- The Application Provider should be considered the principal entity in the ALTD ecosystem, as it is the entity that:
 - Aggregates and distributes linear television channels;
 - Manages the application interface through which consumers access the service
 - Controls the Electronic Programme Guide (EPG), channel presentation and accessibility; and
 - Enables service delivery to end-users across devices. and
 - Has the right to control and take off the content and can be made responsible for the regulatory compliances.

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- The Application Provider should be held accountable for regulatory compliance, including adherence to content quality, anti-piracy and security, consumer protection obligations and any other applicable conditions.
- Other entities such as television manufacturers, operating system providers and broadcasters play important but supporting roles in the ecosystem and cannot be designated as the primary authorisation holders, as they do not directly provide the ALTD service to consumers.
- Designating the Application Provider as the primary authorised entity provides regulatory clarity, ensures single-point accountability, and enables effective oversight and enforcement.

Justification

- The Application Provider is the entity that interfaces directly with consumers and exercises operational control over the distribution of linear television channels.
- Assigning authorisation responsibility to the Application Provider aligns regulatory accountability with functional control, similar to the role of distribution platform operators in traditional broadcasting.
- This approach avoids fragmentation of responsibility, reduces compliance ambiguity, and ensures a clearer and more enforceable regulatory framework for 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 the ‘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**
- b. Validity Period**
- c. Eligibility Conditions**
- d. Minimum Net Worth**
- e. Processing Fee**
- f. Entry Fee**
- g. Bank Guarantee**

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- 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?

Response:

- The authorisation framework should be proportionate, technology-neutral and designed to encourage compliance, while ensuring regulatory oversight.

Suggested Authorisation Framework

- Service Area: Pan-India
- Validity Period: 10 years, renewable
- Eligibility: Indian company with commercial presence in India
- Net Worth: 10 Cr. Or same as DTH/HITs providers
- Entry / Processing Fee: Same as DTH/Hits Providers
- Authorisation Fee: Nil
- Bank Guarantee: Risk-based,
- Roll-out Obligations: With in one year from date of issue of License

Foreign Entities

- Foreign entities should operate through a mandatory Indian subsidiary or authorised Indian entity.
- They should be subject to Indian jurisdiction for enforcement.
- Data localisation and content compliance obligations should apply, as per Indian laws.

Justification

- A clear and proportionate authorisation framework brings ALTD Services within a structured regulatory regime while recognising their distinct technological and operational characteristics.
- Lower and risk-based financial requirements encourage voluntary compliance and formalisation, reducing regulatory evasion.
- Assigning authorisation to Indian entities ensures enforceability, consumer protection and jurisdictional clarity.

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- Applying data localisation and content compliance obligations supports national interest, regulatory oversight and accountability.

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 of the ‘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**

Response.

- The common terms and conditions applicable to Television Channel Distribution Services should also apply to ALTD Services, with adaptations for application-based delivery.
- These should include provisions on:
 - Renewal of authorisation and renewal fee;
 - Management control.
 - Either cross-holding restrictions should be removed or the same be made applicable for Telecom players also.
 - Sharing of infrastructure, where applicable.

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- ALTD application providers should ensure that all linear television channels distributed on their platform hold valid permission from the Ministry of Information & Broadcasting (MIB).
- Since there is no bandwidth constraint in ALTD services, Must Carry and Must Provide provisions should be made applicable.
- Separate annexure on cross holding restrictions is attached herewith as **Annexure-A** giving details and our recommendations.

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 of the ‘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 entities**
- 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 made applicable to the application providers provisioning ‘ALTD Services’.

Response.

- Since there is no capacity constraint, there should not be any reservations of operational channel capacity, rather ALTD service providers should carry all the channels permitted by the MIB provided the same is requested by the broadcasters. (Must carry, Must provide provisions should prevail).

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- The specific terms and conditions applicable to authorised ALTD Services should address operational, regulatory and compliance aspects relevant to application-based distribution of linear television channels and all terms and conditions applicable to DPOs.
- The applicability of mandatory sharing of sports broadcasting signals with Prasar Bharati and the compulsory transmission of certain channels should also be treated similar to other DPOs.
- The specific terms and conditions should be proportionate, technology-neutral and aligned with the application-based nature of the service.

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?

Response

- Television manufacturers and operating system providers should be required to ensure that applications provisioning ALTD Services made available on their platforms are duly authorised by the competent authority under the applicable broadcasting framework as per the service authorization recommendation of TRAI.
- An appropriate assurance or certification mechanism should be prescribed, which may include:
 - Self-declaration by the manufacturer or operating system provider.
 - Periodic verification of authorised applications
 - Compliance with suspension, takedown, or disabling directions issued by the competent authority.

Q7. What kind of assurance mechanisms should be instituted to ensure that the application 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 should be instituted for non-compliance?

Response:

- Authorised ALTD application providers should be required to carry only those channels that hold valid permission from the Ministry of Information and Broadcasting (MIB).
- Application providers should implement appropriate internal mechanisms, including:

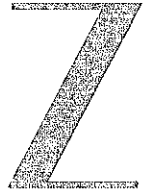
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- Verification of channel permissions prior to onboarding.
 - Periodic review and validation of channels made available on the platform
 - Prompt removal or disabling of any channel found to be non-compliant.
- Deterrence mechanism should be prescribed for non-compliance, which may include warnings, financial penalties, suspension, or cancellation of authorisation, depending on the nature and severity of the violation.

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?

Response.

- Value-added services should be clearly distinguished from linear television channels.
- The terms and conditions should ensure transparency in presentation, access and usage of such services, and should not dilute compliance obligations applicable to linear television distribution.

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 agreements with authorised entities provisioning ALTD services to consumers? If yes, provide reasons with justification.

Response

- Broadcasters or content owners providing linear television channels on ALTD platforms should be mandatorily required to obtain service authorisation as mandated by TRAI;
 - Satellite-based broadcasting
 - Ground-based broadcasting.

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- Such authorisation should be obtained prior to entering into any arrangement with authorised ALTD application providers for distribution of linear television channels to consumers.
- The applicable terms and conditions for such authorisation should apply uniformly, irrespective of the mode of delivery of the linear television channel, including satellite, terrestrial, or IP-based networks.

Justification

- Linear television channels distributed on ALTD platforms are functionally identical to channels distributed through traditional platforms, and therefore should be subject to the same authorisation and accountability framework.
- Mandating authorisation ensures content accountability, regulatory oversight, and compliance with Programme and Advertising Codes, irrespective of the transmission medium.
- This approach prevents regulatory arbitrage, ensures a level playing field across distribution platforms, and provides clarity to broadcasters, application providers, and regulators.
- Uniform authorisation requirements also facilitate effective enforcement and monitoring of linear television services distributed over IP networks.

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.

Response

- TRAI should adopt platform neutral content pricing model to avoid confusion to the customer and level playing field to the distribution platforms.
- Pay television channels should not be made available free of charge on ALTD platforms.

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 comments with detailed justification.

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Response:

- Authorised ALTD application providers should implement technology-driven consumer protection and grievance redressal systems, integrated within their platforms.
- The application provider should be the technically accountable entity, as it controls the application, content delivery systems, user interface, and service availability.
- ALTD application providers should maintain system logs and records of:
 - Service availability and uptime.
 - Content accessibility.
 - Complaint receipt and resolution actions.
- The technical framework should support auditability and inspection, enabling regulators to verify compliance with consumer protection obligations.

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.

Response

- Integration of ALTD Services into the television audience measurement framework should be based on verifiable and platform-generated data.
- ALTD application providers should share standardised and anonymised viewership data, including:
 - Channel or stream identifiers.
 - Session starts and end timestamps.
 - Device type and operating system (non-personalised)
 - Application version and platform type.
- The audience measurement methodology should rely on actual consumption data captured through playback events, rather than estimates or extrapolated figures.
- Integration should be implemented in a phased manner, starting with platform-level reporting and subsequently aligning with recognised television rating systems.
- Common standards should be prescribed for data definitions, reporting formats and timelines, to ensure consistency and comparability across platforms.





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.

Response:

- ALTD application providers should ensure that any viewership data published by them is accurate, consistent, and based on verifiable data sources.
- The regulatory framework should enable transparency in data publication, while ensuring that such disclosures do not conflict with recognised television audience measurement systems or applicable regulatory norms.

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.

Response:

- Platform neutral compliance of regulatory framework should be mandated for the consumers with respect to tariff, interconnection and quality of service aspects.

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.

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ANNEXURE - A



The policy/regulations which govern cross - holding (ownership across different segments of the media and telecom value chain) is central to ensuring a level playing field in India's rapidly converging digital ecosystem. Current policies focus on preventing vertical integration—where one entity controls both the "pipe" (distribution) and the "content" (broadcasting)—to avoid monopolistic gatekeeping only in the linear distribution of content.

Current Cross holding policy/regulations: Telecom vs TV Distribution Platforms

- Telecom operators (e.g., telcos, ISPs) currently face no cross-holding restrictions under telecom licensing regimes. Which means any Telecom company can own Broadcast/Distribution platforms without any hindrance.
- In contrast, TRAI's existing broadcast regulations prohibit vertical cross-holding between broadcasters and distribution platforms (e.g., DTH/HITS) to maintain media plurality and prevent concentration of power.
- This discrepancy has created an uneven regulatory landscape, giving telecom operators flexibility which is not granted to Broadcast and TV distribution entities, potentially impacting competition and content neutrality.

Following is the summary of constraints (as on date)

Entity Type	Restriction	Limit
DTH Licensee	Cannot own stake in Broadcaster/Cable Co	> 20%
Broadcaster	Cannot own stake in DTH/HITS Co	> 20%
HITS Licensee	Cannot own stake in Broadcaster/DTH Co	> 20%

Entity Type	Restriction	Limit
Telecom Operator	No	No

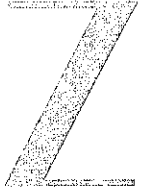
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1. Broadcaster and DTH/HITS Regulations

- **20% Cap on Equity:** Broadcasting companies and Cable Network Companies are restricted from holding or owning more than **20%** of the total paid-up equity in a DTH company.
- **Reciprocal Restriction:** Conversely, a DTH or HITS licensee company is not allowed to hold or own more than 20% equity in any broadcasting company or cable network company.
- **HITS Applicability:** Similar 20% restrictions apply to HITS operators regarding stakes held by broadcasters/DTH operators.
- **Cross-Holding Constraints:** Entities holding more than 20% in a HITS license cannot hold more than 20% in another Broadcaster/DTH company, and vice-versa.

2. DPO (Distribution Platform Operator) & Cable Ownership

- **Horizontal Integration:** There are currently no restrictions on cross-media holdings *among* delivery platforms (e.g., a DTH/HITS licensee can have an equity stake in a MSO/Cable Operator).
- **Vertical Restriction:** However, vertical integration between a content provider (broadcaster) and a distribution platform (DTH/HITS) remains limited, specifically designed to stop broadcasters from favouring their own distribution platforms.

3. Telecom (TSP) and Broadcasting/Media Integration

- **No Cap on Telcos:** Currently, there are no cap to prevent telecom operators from holding stakes in broadcasting and MSO business thus creating a vertical integration network.
- **Industry Demand for Limits:** The Association of Radio Operators for India (AROI) and other stakeholders have demanded that the 20% vertical integration cap applied to broadcasters and DPOs be extended to telcos that own content.

4. Recent Developments and 2025-2026 trends:

- **Telecommunications Act, 2023:** The industry is moving towards a "unified authorization framework" which covers broadcasters, DTH, HITS, and IPTV under a simplified licensing regime.
- **Draft Telecommunications (Broadcasting Services) Rules, 2026:** Proposed rules indicate stricter oversight on broadcasting infrastructure, including HITS and DTH.
- **Ratings Agencies (TRP) Control:** The 2025 TV Rating Policy bars broadcasters from owning more than a nominal stake in rating agencies, aiming to restore a regulatory wall between media owners and measurement bodies. However, there is no restriction

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on the platforms publishing own data which can be used by the Telecom companies to effectively influence the rating regime in their favour.

To ensure fair competition among all stakeholders, including traditional broadcasters, telecom operators, and emerging digital platforms, we recommend the following:

- **Uniform Regulatory Application:** Extend vertical integration restrictions (like the 20% equity cap) to Telecom Service Providers (TSPs) who increasingly own and control both the distribution pipe and content libraries.
- **Platform Neutrality:** Ensure that distribution platforms—whether DTH, cable, or IPTV—do not provide preferential treatment or discriminatory pricing to their own vertically integrated platforms.

Cross holding restriction either should be removed in totality or implemented across the value chain whether linear or digital similarly to provide plurality and fair competition between stakeholders at all levels. A one-sided cross holding restrictions on one set of stakeholders will hinder growth for other set of stakeholders while creating monopoly on other side who are outside these restrictions.