



TCL/RA/TRAI-CP-B&CS/2018/1

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New Delhi – 110002

Sub: TCL Response to TRAI Consultation Paper on Issues relating to Uplinking and Downlinking of TV Channels in India

Dear Sir,

Kindly find attached herewith Tata Communications Ltd. response on the TRAI Consultation Paper dated 19th December, 2017 on “Issues relating to Uplinking and Downlinking of TV Channels in India”.

It is requested that the same may kindly be taken on record.

With kind regards,

For Tata Communications Ltd.


(Praveen Sharma)
Authorized Signatory

Encl: a/a.

TATA COMMUNICATIONS

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**TATA COMMUNICATIONS RESPONSE TO TRAI CONSULSTATION PAPER ON ISSUES
RELATING TO UPLINKING AND DOWNLINKING TELEVISOIN CHANNELS IN INDIA**

TELEPORT

4.24 Whether specific definition of a teleport is required to be incorporated in the policy guidelines? If yes, then what should be the appropriate definition? Please elaborate responses with justification.

TCL Response: Teleport has to be defined as an antenna or array of antennae pointed on one or multiple satellites based on the techno-commercial requirement. The size (diameter of parabolic dish) can vary from 4.5 meter to 9 Meter and 13 meter and 18 Meter and beyond if applicable. This also can be defined as an antenna which can operate on C band or Extended C Band or Ku Band either together or independently as per requirement. It should be typically parabolic dish for C band and it should be able to support both H and V Polarization if it has linear feeds. These teleports can be either be made in India or can be imported based on techno commercial requirement. Smaller antenna or Teleport can be either fixed type or steerable. The teleports to be classified in two categories: 1. Own captive use 2. Service Provider installed /managed teleport for offering uplink service to customers. Teleports should be allowed to uplink one or multiple TV channels as well as receive or downlink multiple TV channels for service offering as applicable.

4.25 Is there any need to increase the amount of non-refundable processing fee to be paid by the applicant company along with each application for teleport license? If yes, what should be the amount of non-refundable processing fee? Please elaborate with justification.

TCL Response: The amount of non-refundable processing fee should cover only the administrative expense for processing the application. Undue barrier should not be created to stifle the growth of this sector. Looking into various other permissions and licenses from other Government Ministries for providing different kind of permission/license for providing services, we recommend that there should not be any increase in non-refundable processing fee from the current prevailing fee.

4.26 Should entry fee be levied for grant of license to set up teleport? If yes, what should be the entry fee amount? Please give appropriate justification for your response.

TCL Response: Teleport operators being enablers for uplinking and downlinking of TV channels, there should not be any entry fee levied for license to set up a teleport hub. Setting up of a teleport hub is capital intensive enterprise and adding entry fee will only add to the overall cost of uplinking and downlinking of any TV channels. Hence we recommend that there should not be any entry fee for grant of license to set up teleport. However there has to be a differentiation between captive teleports and service provider teleports. More

relaxation and quicker processing has to be accorded to service provider teleports to enable growth of broadcast sector and overall economy.

4.27 What should be the license fee structure for teleport licensees? Should it be fixed, variable or semi-variable? Please elaborate if any other license fee methodology is proposed, with appropriate justification.

TCL Response: We recommend for existing license fee structure of fixed license fee. To make India a cost effective and competitive destination for uplinking and downlinking of TV channels worldwide, license fee should be kept at minimum for the growth of this sector. This will also help in generating employment and foreign exchange for Indian company and will be in sync with Government policy of make in India.

4.28 What should be the rate of such license fee? Please give appropriate justification for your response.

TCL Response: Present license fee regime should be continued for the time being to promote the growth in this sector.

4.29 What should be the periodicity for payment of the license fee to the Government? Please support your answer with justification.

TCL Response: We recommend for Annual license fee which is the most viable option as it saves us from unnecessary compliance requirements.

4.30 What should be the periodicity for revision of the entry fee, and license fees rate for teleport licensees?

TCL Response: It should be 10 yearly revision process which also coincides with the period of teleport permission.

4.31 Whether there is a need to restrict the number of teleports in India? If yes, then how the optimum number of teleports can be decided? Please elaborate your responses with justification.

4.32 Whether any restriction on the number of teleports will adversely affect the availability or rates of uplinking facilities for TV channels in india?

TCL Response: There is no need to restrict the number of teleports in India as there is no restriction of number of TV channels being licensed. As broadcast sector is at growing stage and setting up a teleport being a very capital intensives enterprise, for the sake of infusing new capital and efficient technology into the sector and for fair competition in the industry,

the number of teleport operators in India should be left to market dynamics to decide. This will also encourage the competition among teleport operators thereby reducing the cost of uplinking and downlinking of TV channels from India.

4.33 What should be the criteria, if any, for selecting location of teleports? Should some specific areas be identified for Teleport Parks? Please elaborate your responses with justification.

TCL Response: This should be left to market forces to decide the location of the teleport hub. Clubbing all the teleport hubs at specific locations will create disruption of services at the time of disaster or any natural calamity. It is in the best interest of country that teleport hub locations should be spread in different geographical areas for the sake of continuity of the services in adverse natural disasters. Disaster recovery teleports should be given a special and separate treatment and they should be allowed to operate as regular as well as DR teleports as applicable and special permissions to be given to enable smoother and faster recovery of channels or providing continuity of service in case of calamity, which should be defined in advance along with necessary prior approvals.

4.34 Please suggest the ways for the optimal use of existing infrastructure relating to teleports.

TCL Response: The Teleport can be categorized to operate for Uplink for Indian channels and downlink in India with MIB permission and other category can be setup for Uplinking of foreign content as received through fiber network on encrypted manner but only for outside India use. This way many occasional services can be availed in India as against other South-Asian countries and the revenue can be generated within India or Foreign Exchange inflow is feasible. Such teleports should have a different approval formats and the signal/content should not be controlled or regulated in the same manner as of Indian channels as these are not meant for Indian consumption. These kinds of rules exist in several countries where the downlink is regulated but uplink of content to outside country are not fully regulated or not regulated at all.

4.35 What specific technological and regulatory measures should be adopted to detect, and stop uplink of signals of non-permitted TV channels by any teleport licensee? Please elaborate your responses with details of solution suggested.

TCL Response: Existing regulatory measures and monitoring mechanism should be enforced through available resources of EMMC, NOCC, and WMO etc. New software based control and monitoring mechanisms already available in market can be employed to ensure compliance.

4.36 Stakeholders may also provide their comments on any other issue relevant to the present consultation.

TCL Response: Teleports should be able to uplink on any satellite both Indian and Foreign and regulatory restrictions have to be minimal. Most important factor would be time based approval for each of the regulatory requirement in MIB, WPC and NOCC. This will enable the Teleport as well as broadcast community to work out the exact time frame to launch a business model and this will bring clarity to the operations of the broadcasting industry and will further boost the economy as well.
