

F No. 113/TTSL/2007

19<sup>th</sup> October 2007

The Advisor (MN)  
Telecom Regulatory Authority of India,  
Mahanagar Door Sanchar Bhawan,  
Jawahar Lal Nehru Marg (old minto road)  
New Delhi – 110 002

**Subject: Comments on TRAI's Consultation paper on Issues Relating to Mobile  
Television Services.**

Dear sir,

The TRAI has released the aforesaid Consultation paper on 18<sup>th</sup> September 2007 seeking comments of all stakeholders. The comments of Tata Teleservices Limited and Tata Teleservices (Maharashtra) Limited are attached for your consideration please.

Thanking you,

Yours faithfully,

Harish Kapoor  
Addl Vice President - Corporate Regulatory Affairs  
**For Tata Teleservices Limited**  
&  
Authorised Signatory  
**For Tata Teleservices (Maharashtra) Limited**

Encl: a/a

**TTSL & TTML comments on questions posed by TRAI in its Consultation paper on Issues Relating to Mobile Television Services**

At the outset we would like to submit that provision of Mobile TV services squarely falls within the ambit of the scope of services of Unified Access Service License. Therefore, any entity wishes to provide Mobile TV service should necessarily obtain UASL. Besides, the UAS Licensees already have towers and billing relations with the end users in place therefore the Authority / Government should immediately announce its policy to open the Private TV Broadcasting for Mobile TV to UAS licensees only. With these submissions our comments on the issues raised in the Consultation paper are given hereunder for consideration please.

**Issue 1 Whether the technology for mobile television service should be regulated or whether it should be left to the service provider.**

The telecom and broadcasting sector is highly technology centric and changing at a very fast pace due to innovative services in converged platform. The Mobile TV service is prone to have various access options and is supported by multiple technologies simultaneously. Therefore, it is at all not advisable to regulate technology for Mobile TV service and it should be left upon to be decided by service providers. Needless to mention the Government / Authority has also been consistently advocating technology neutral regime. However, for a healthy growth of Mobile TV services under the convergence scenario, it has become necessary to demarcate all type of 'carriage' & 'content' services separately. The carriage should be licensed by DOT and content by I & B Ministry. The carrier should provide the content of the authorised content provider only.

**Issue 2 If the technology is to be regulated, then please indicate which technology should be chosen and why. Please give reasons in support of your answer.**

No reply in view of our response to Issue 1 above.

**Issue 3. What will be the frequency requirement for different broadcast technological standards for terrestrial and satellite mobile television transmission in India?**

Terrestrial transmission in suitable band is preferable to satellite transmission due to superior propagation. We therefore recommend that to start with at least three to four carriers of 8 MHz spectrum per service provider should be made for the launch of mobile TV service, irrespective of the technology being used by the service provider. We are also of the firm view that 700 MHz range would be quite appropriate frequency band for mobile TV as this band has the most optimum mobility performance and good in-building penetration characteristics.

**Issue 4. Which route would be preferable for mobile TV transmission – dedicated terrestrial transmission route or the satellite route? Should the mobile TV operator be free to decide the appropriate route for transmission?**

TTL is of the view that the Unified Access Service Provider should be free to decide the appropriate route for Mobile TV transmission. Since the UAS Licensees already have transmission towers and direct billing relationship with end user in place, the policy for allowing private TV broadcasting should be made on an urgent basis for faster penetration of Mobile TV.

**Issue 5. How should the spectrum requirements for analogue/ Digital/ Mobile TV terrestrial broadcasting be accommodated in the frequency bands of operation? Should mobile TV be earmarked some limited assignment in these broadcasting bands, leaving the rest for analog and digital terrestrial transmission?**

Since UASLs by virtue of their existing licence are eligible to provide mobile TV and no duplication of infrastructure would be required to provide the service, the frequency bands in 700 MHz range would benefit Mobile TV deployment. This practice has been adopted by several other countries as well. Assigning Mobile TV spectrum in globally aligned bands will allow service providers and end users to benefit from global economies of scale and have a sufficiently wide range of equipment and devices.

**Issue 6 In the case of terrestrial transmission route, how many channels of 8 MHz should be blocked for mobile TV services for initial and future demand of the services as there are nearly 270 TV channels permitted under down linking guidelines by Ministry of Information and broadcasting?**

TTL is of the view that initially THREE to FOUR channels of 8 MHz be provided for Mobile TV service and another 3 to 4 channels be blocked for allowing future expansion.

**Issue 7 Whether Digital Terrestrial Transmission should be given priority for the spectrum assignment over mobile TV, particularly in view of the fact that the Mobile TV all over the world is essentially at a trial stage.**

Mobile TV has already been launched commercially in a dozen countries. It would therefore not be appropriate to state that Mobile TV is essentially at a trial stage. There is no reason for assigning higher priority to Digital Terrestrial Transmission over Mobile TV for spectrum assignment.

**Issue 8 Whether the frequency allocation for the mobile TV should be made based on the Single Frequency network (SFN) topology for the entire service area or it should follow Multi Frequency Network (MFN) approach.**

Since the Single Frequency Network (SFN) tends to increase the coverage area and is highly frequency efficient as compared to analogue TV, TTL is of

the view that Mobile TV should be based on SFN topology for the entire service area.

**Issue 9 Whether frequency spectrum should be assigned through a market led approach – auctions and roll out obligation or should there be a utilization fee?**

TTL is of the view that the Unified access service licensee who intend to offer mobile television service should be assigned spectrum as usual. Usage fee as is existing now may be levied after the system and technology stabilizes. A minimum of one year period from the date of commencement of service should be treated as a “pilot period” and no fees or levies be charged for this pilot period. After the successful competition of the pilot period, the levy / charges should be as applicable to UAS licensees.

There is no justification for any company other than holder of Unified Access Service License to be allocated spectrum for Mobile TV.

**Issue 10 What should be the eligibility conditions for grant of license for mobile television services?**

We are of the view that an entity who has acquired the UAS licence should be allowed to provide mobile TV service. In view of this we feel that there is no need or ground for framing any new eligibility criteria. The eligibility conditions for obtaining UASL gets automatically applicable.

**Issue 11 Whether net worth requirements should be laid down for participation in licensing process for mobile television services? If yes, what should be the net worth requirements for participation in licensing process for mobile television services?**

The UAS Licensees only being eligible to provide Mobile TV, there is no necessity of creating a new class of mobile TV operators. Accordingly, the net worth as required for obtaining UASL to continue.

**Issue 12 What should be the limit for FDI and portfolio investment for mobile television service providers?**

As stated earlier that only UAS licensees are to provide mobile TV and as such the limit of FDI for unified access service licensees providing mobile television service should continue at the present limit of 74%.

**Issue 13. What should be the tenure of license for the mobile television service providers?**

The UAS Licensees being only eligible to provide Mobile TV, the tenure of Unified Access Service license i.e. 20 years is the tenure for mobile TV as well.

**Issue 14 What should be the license fee to be imposed on the mobile television service providers?**

Under the UASL, the Licensee can provide triple play, viz voice, video and data. Hence there should not be any additional license fee for UASL operators as the License fee applicable for Unified Access Service Licensee automatically is applicable for Mobile TV service also.

**Issue15 Whether in view of the high capital investment and risk associated with the establishment of mobile television service, a revenue share system would be more appropriate?**

The UAS licensees are paying licence fee based on revenue share. The same should be applicable for provision of mobile TV as well.

**Issue 16 Whether any Bank Guarantee should be specified for licensing of the mobile television service providers. If yes, then what should be the amount of such bank guarantee? The basis for arriving at the amount should also be indicated.**

In the current licensing framework the UAS licensees are required to give performance bank guarantee and financial bank guarantee. As such, for provision of mobile TV service, they should not be subjected to further bank guarantee.

**Issue17 Whether the licenses for mobile television service should be given on national/ regional/ city basis.**

As stated in earlier paragraphs that there is no justification for separate licence for mobile television service as the same is allowed under the scope of service of UASLs , the service area should be as specified for obtaining UAS licence.