

TRAI CONSULTATION PAPER

ON

**“TARIFF ISSUES RELATED TO TV SERVICES”
Dated 29th January 2016**

RESPONSE OF

**NEO SPORTS BROADCAST PRIVATE
LIMITED**

PREFACE

Until now the biggest challenge surfaced before the industry was to establish an addressable environment by consciously allowing benefits & systematic protection from Broadcaster to all Distribution Platform Operators (DPOs) migrating to addressable model to hasten the industry wide addressability. It is because of the Regulators phenomenal effort & support that today addressable DPOs have reached unprecedented size and scale. Today many of the DPOs have the unparalleled ability to dominate most broadcaster's business models. Their influence and ability to impact is particularly overwhelming with respect to the small, medium & niche channels and or channels operating on standalone basis.

It is not so much of a surprise that despite a major landmark step taken by the Regulators, that discouraged content aggregations as distribution model, not many channels have taken advantage of it to enter into the subscription business on its own. Hence, in many ways, resulting in sub-optimizing the subscription space that may have been available and the reason for the Regulator to introduce this landmark step.

Going forward, the DPOs consolidation and their market power is only going to increase even more significantly in this addressable environment which means that balance in operating conditions for such small, medium and niche channels will only become more difficult so much, that their entire survival will now rest in the hands of many large and dominant DPOs as these channels despite offering great value & variety will never have the power to withstand the negotiating position adopted by these dominant DPOs in the absence of the backing of large vertically integrated companies or absence of financial wherewithal to market themselves or take on these large DPOs become increasingly dominant. Hence such small, medium and niche channels will be having no choice but to acquiesce to the terms of these DPOs

Hence, there is urgent and clear need to focus to bring greater balance amongst the stakeholders i.e. DPOs & the Broadcasters which for majority of latter is tilting away. These niche, small & medium channels with no real power to negotiate with the DPOs are simply and meekly compelled to absurd terms and still do not get their fair share of subscribers to look to protect their business.

Therefore, Regulator must look into the subscription landscape & regulatory framework and thereby create such built mechanism that not only remains fair but also provides the required checks for the DPOs to adequately address the channels concerned. Much like they did for the DPOs moving the addressable environment.

Reply to Consultation Issues:

1. **Which of the price models discussed in consultation paper would be suitable at wholesale level in broadcasting sector and why? You may also suggest a modified/ alternate model with detailed justifications.**

NEO'S Views: NEO advocates an alternate model of pricing at the wholesale level in the broadcasting sector as a strategic paradigm to improve distribution efficiency in the Broadcasting Industry is the need of the hour and therefore, we suggest :

Wholesale price relationship with the DPOs – Fixed/ Variable model (X/Y.K):

Fixed fee is a reality that may need more time for stakeholders to realign this operating model; however it is also a fact that unless addressability model is not introduced as the primary lever that ensures that channels reach a minimum critical subscription size necessary for their survival, allowing for fixed fee without such considerations, will defeat the intended objective of addressability

Today many small, medium & niche channels & broadcasters are being forced into arbitrary and whimsical fixed fee terms because they have no way/ regulatory lock-in to seek reciprocal business assurance /protection from DPOs against such situations

*Hence, this proposed model achieves the above twin conditions that presupposes that unless the DPO has not assured such channels a minimum business size and penetration on their platform (both condition together called as "**mandatory condition**"), they cannot enter into any form of fixed fee arrangements with them.*

*This **Mandatory Condition** must be met at all times and regardless of the fixed fee entered thereafter to provide safety of business to such small channel who really have no meaningful negotiation power with these dominant DPOs. DPOs must ensure that "Mandatory Terms" remain intact & unaltered for them to continue with any other commercial arrangements or else their model will revert back to the Mandatory terms*

Mandatory Condition may be defined as the minimum % of subscriber penetration (X") that the DPO will provide to the broadcaster at the prescribed value of their wholesale price (CPS) ("Y") before the DPO becomes entitled to enter into any other form of commercial arrangements including the fixed fee.

Hence, unless the broadcaster is not assured of subscription revenue and subscriber penetration specified in the mandatory condition in the addressable environment, parties cannot enter into any fixed fee terms ("K"). Until this Mandatory Condition is not

achieved the mode of working will continue to be only CPS as may be defined in the RIO of the broadcaster.

This mandatory condition & terms may vary for different category/ genre of channels keeping in mind current market realities using combination of different parameters i.e. objective data sourced from industry, genre, advertising, subscription, penetration, stakeholders feedback etc.

The Regulator will define the specified thresholds (Mandatory condition) annually for the upcoming year(s) so that all the stakeholders can plan in advance

The broadcaster may in their RIO include all forms of addressable model for its continuance but if it wishes to enter into a fixed fee model or DPOs seeks to enter into a fixed fee model, the base level mandatory conditions will have to be met even if it is not consistent with the RIO/ CPS model announced by the broadcaster. Having crossed the Mandatory Condition, it does not oblige either parties to necessarily seek/ get fixed fee terms. Both parties may continue on or the broadcaster to seek fixed as default route. Both parties may agree to continue on CPs or any other form of arrangement that is CPS

Here is an illustration using a hypothetical example:

Mandatory condition fixed by the Regulator for a category A/ Genre of channels could be as follows

“X” condition: DPOs must offer at least 20% of their subscribers to the “A” category broadcasters

“Y”: Broadcaster to offer to the DPOs to get subscription revenues @ of 60% of the channels wholesale price for 20% of DPOs subscribers (as defined in “X” condition)

Therefore once the broadcaster in the category “A” has been able to realize the subscription value and the required minimum subscriber penetration, then the two parties can go for fixed fee or any other form of non-CPS arrangements.

Major advantages:

1. This model assures base level addressability to all small, medium & niche channels & broadcasters for ensuring their survival if they built their model along subscription business
 2. Regulator has ability to set the direction of the industry positively at macro level.
 3. Broadcaster will be free to retain the ability to price the channels at wholesale level & within the specified scope as may be prescribed by the Regulator.
 4. This model has the ability to address the issues/ malaise by genre clearly.
 5. It gives strong impetus for new businesses to build their subscription model an important ingredient in the success of DPOs and the industry.
2. **Which of the corresponding price models discussed in consultation paper would be suitable at retail level in broadcasting sector and why? You may also suggest a modified/ alternate model with detailed justifications**

NEO'S Views: *In our view the retail price for the DPOs must be capped in the following manner if they sell the bouquet on standalone basis or its channels in a-la-carte mode.*

- 1. If the deal is CPS (RIO) based, the maximum permissible price allowed to be charged per channels/ bouquet should be 15% over of the average price at which the channels/ bouquet has been sold by the DPOs in its various packs or the wholesale price at which the DPO has purchased the channels/ bouquets, whichever is lower*
 - 2. If the deal is on the fixed fee & is being sold on standalone basis its bouquet or a-la-carte, those channels; then they may be allowed 30% of the weighted average price of the channels/ bouquet being sold by them in various packages or the effective price as per the mandatory conditions whichever is lower.*
 - 3. The DPO has been allowed higher margin in the fixed fee since it has been assumed that they have a committed fixed payment to make, hence higher risk.*
- 3. How will the transparency and non- discrimination requirements be fulfilled in the suggested pair of models? Explain the methodology of functioning with adequate justification.**

NEO'S Views:

For ensuring transparency and non discrimination with the suggest pair of models below mentioned parameters need to be followed:

- 1. Fulfillment of the mandatory condition at the wholesale level: so that until and unless the DPOs are not assuring all such channels a minimum business size and penetration on their platform, they cannot enter into any form of fixed fee arrangements with them. At par the mandatory conditions will save exploitation of the small, medium & niche channels from dominant DPOs.*
- 2. Eliminate discriminatory power of Distributor to remove existing channels:*

This can be achieved by ensuring DPOs adopt the following methodology:

- Distributors must publish objective, empirically demonstrable & fair criteria for subjecting any channels for removal reviews. It must also specify/ identify the name & number of channels it intends to remove in each category it may have created based on the criteria.*
- Criteria to be taken out at least 6 months in advance i.e. from the date the criteria becomes effective & must remain in force unchanged for a minimum 2 years period.*
- Publish details/ reasoning for channels removed, considered & substituted*

Future business decisions are guided by advance planning & backed by strong rational & empirical data. Distributors must exhibit that even channel removal process are governed by such considerations & not motivated by profiteering since such actions have huge impact on the channels. Giving advance information with unambiguous reasons will only incentivize channels to improve itself. It will also mean that the focus has shifted from targeting a channel to objective considerations for such actions! Hence at the end of the review year, if the identified channel has overcome the criteria then it can't be removed, instead an unlisted channel that now meets the removal criteria must only be removed. Publishing details & reasoning for channels removed, considered & substituted will ensure distortion free process & prevent abuse by vertically integrated companies.

3. *Reckless use of Must Provide clause must be qualified: Existing Channel once removed by the network cant gain access to it under "must provide clause" for a predefined period i.e. 2 years for all genres & 8 years for sports. If distributors starts whimsically & randomly removing & taking back channels it is clear that is it not driven by business consideration but profiteering. Hence such action are bound to severely impair the broadcasters P&L since the broadcaster will no longer have control over its critical business model despite being the creator & prime investor in it. So how is the pay channel expected to secure its business? Since driver content rights in sports are usually sold for 5-8 years, hence distributor should not time his action of removing & taking back channel that should coincide with such acquisition as it will ruin the business of the sportscaster, hence it is proposed 8 years moratorium for sport genre,*

4. How will the consumers interests like choice of channels and budgeting their expenses would be protected in the suggested pair of models? Give your comments with detailed justifications.

NEO'S Views: *The Consumers interest pertaining to choice of channels and budgeting their expenses will be duly protected only when there is stringent measures on the DPOs by eliminating discriminatory powers of the DPO to remove existing channels and in this context the following is our suggestion:*

- *Make Box swapping mandatory within a specified time period of receiving consumer request.*
- *Introduce reasonable pricing mechanism for switching boxes quickly.*
- *Penalize networks severely for delays. Start calling for monthly logs of such complaints/ requests & action taken report.*

The Consumers, are lured to opt for a DTH operator by showing to the consumers that they have all the channels from all the genres in their base pack due to which the Consumers subscribe to their services and thereby opt for the Annual Packages relying on the fact that the base pack is a consortium of various channels which they intended to watch during their subscription tenure. If the DPOs are allowed to make changes in the base pack at their whims and fancies then it will be prejudicial on the part of the

Consumers and will surely impact their choice of channels and budgeting expenses and therefore, we further suggest the following:

All DPOs must mandatorily furnish the details to Regulator of every channel, which have been removed. Along with that, all DPOs must furnish details of number of subscriber affected, of such channel(s) that are removed during the lock in period as prohibited by the Regulator. DPOs must also furnish details of all channels removed along with log of subscriber option provided for and completed by the DPOs for all such removed channels. DPOs must ensure the compliance of the aforesaid criteria and in the event of non-compliance stringent action must be take against the DPOs by the Regulator. Apart from that, all DPOs must send log reports for the aforesaid to the Regulator every month so that there will be no scope for non-discrimination.

- 5. Which of the integrated distribution models discussed in consultation paper would be suitable and why? You may also suggest a modified/ alternate model with detailed justifications.**

NEO'S Views:

We have already provided our opinion on the distribution models best suited for our Industry

- 6. How will the transparency and non-discrimination requirements be fulfilled in the suggested models? Explain the methodology of functioning with adequate justification.**

NEO'S Views:

We have already provided our opinion above on the steps to be taken by the Hon'ble Authority in order to bring transparency and non-discrimination by adopting the business models mentioned above.

- 7. How will the consumers interests like choice of channels and budgeting their expenses would be protected in the suggested integrated distribution models? Give your comments with detailed justifications.**

NEO'S Views:

We have already provided our opinion above on the steps whereby the consumer's interest will be guarded on the choice of channels and budgeting their expenses.

- 8. Is there a need to identify significant market powers?**

NEO'S Views:

Yes, significant market power needs to be identified. Moreover, significant market powers will not provide conducive conditions for smaller players to exist. Small players constitute over 90% of the businesses (over 700 broadcasters) & significantly add to entertainment variety & are the bedrock of new experiments as a result of which industry is growing yet it remains exposed to maximum survival risk because the current environment that allows better scope for dominant players/vertically integrated players to optimize itself.

9. What should be the criteria for classifying an entity as a significant market power? Support your comments with justification.

NEO'S Views:

According to us, significant power means any company/entity who has

- a. Over 50% of the market share in a specific market*
- b. Over 30% market share in the region in which it operates in on overall basis*
- c. Over 5 million subs on all India basis*
- d. Any vertical integrated Company (DPO/channel) who has the ability to affect the industry*

10. Should there be differential regulatory framework for the significant market power? If yes, what should be such framework and why? How would it regulate the sector?

NEO'S Views:

Yes, there should be differential framework for the significant market power. Significant market power can create a risky environment by pouring in huge capital to remove small, medium and niche channels. Regulators need to define clear yardsticks to regulate the significant market power so that benefit of small and medium size entity can be ensured. For doing so, yardsticks need to be defined at market level, operational level, B2B & B2C & different yardsticks to maintain the transparency in business.

11. Is there a need to continue with the price freeze prescribed in 2004 and derive the price for digital platforms from analog prices? If not, what should be the basic pricing framework for pricing the channels at wholesale level in digital addressable platforms?

NEO'S Views: *We should allow price increases on the following different yardstick which should vary from*

- genre to genre,*
- Costing and business model i.e. the Acquisition cost*
- Inflation*
- Advertising opportunities*
- Nature of the business*

12. Do you feel that list of the Genres proposed in the consultation paper (CP) are adequate and will serve the purpose to decide genre caps for pricing the channels? You may suggest addition/ deletion of genres with justification.

NEO'S Views:

The list of the Genres as proposed by the Hon'ble Authority in the consultation paper is adequate. Additionally, there should be a sub category for non vertical, non aligned, medium, small & niche channel company, entities who are operating on their own independently so that their concerns are adequately looked upon and addressed as majority of them fall into this category.

13. Is there a need to create a common GEC genre for multiple GEC genre using different regional languages such as GEC (Hindi), GEC (English) and GEC (Regional language) etc? Give your suggestions with justification.

NEO'S Views:

Yes, a common genre for multiple GEC genres is required, as it will assist the consumer to arrive at its choice of the channel without undue surfing of the other channels and thereby wasting time.

14. What should be the measures to ensure that price of the broadcast channels at wholesale level is not distorted by significant market power?

NEO'S Views:

Our views in this context have already been responded in the preceding questions above.

15. What should be the basis to derive the price cap for each genre?

NEO'S Views:

We have already provided our opinion above in this context.

16. What percentage of discount should be considered on the average genre RIO prices in the given genre to determine the price cap?

NEO'S Views:

We have already provided our opinion above.

17. What should be the frequency to revisit genre ceilings prescribed by the Authority and why?

NEO'S Views:

The Regulator may revisit genre ceilings in every two years since the business model now seems to settle down, hence it requires closer review.

18. What should be the criteria for providing the discounts to DPOs on the notified wholesale prices of the channels and why?

NEO'S Views:

We have already provided our opinion above.

19. What would be the maximum percentage of the cumulative discount that can be allowed on aggregated subscription revenue due to the broadcasters from a DPO based on the transparent criteria notified by the broadcasters?

NEO'S Views:

We have already provided our opinion above in this context.

20. What should be parameters for categorization of channels under the "Niche Channel Genre"?

NEO'S Views:

We suggest following parameters for categorization of channels under the "Niche Channel Genre"

- *They should be classified on the basis of average reach, average penetration and size of target audience they are reaching through their channel.*
- *The segment spaceniche channels trying to capture in entertainment industry.*
- *The investment capacity of the niche channel company.*
- *Negotiating position vis a vis to dominant DPO.*

It is pertinent to note that even in a mass based genre a channel can pursue or target a small base of audiences in that mass based genre. Hence, it must also be treated as a niche channels

To illustrate: A sports channel only targeting football audience alone or combination of such small audience, such channel should also be considered as niche channel even if sports per se is mass based genre.

Further, it should be important that small, medium and niche channel entity should be supported to get into the position to evolve into a salutary mass base channel and organization to support the industry growth. Since, in the current size, they don't have

the financial wherewithal to compete with the muscle power of the dominant ones despite offering great product and innovative value. Hence, niche channel must be provided with healthy environment and support for thriving the industry overall.

21. Do you agree that niche channels need to be given complete forbearance in fixation of the price of the channel? Give your comments with justification.

NEO'S Views:

We have already provided our opinion above in this context.

22. What should be the maximum gestation period permitted for a niche channel and why?

NEO'S Views:

In our understanding, the proposed question tries to refer to New Channels. In this regard, we suggest that 24 months of hand handling by the Regulator and market incentives at DPO and business level so that there is clear incentive for new models to spring and obligations on the DPOs to fairly distribute the channel on non-discriminatory and transparent ground for the equal opportunity access to new channels so that they can build their business. Unless such handholding opportunities are not provided then no new channel will experiment with innovative ideas.

23. How misuse in the name of "Niche Channel Genre" can be controlled?

NEO'S Views:

We have already provided our opinion above in this context. However, all the parameters of niche/new channel should be clearly defined and periodically reviewed by the Regulators so that any misappropriation are immediately noticed & corrected.

24. Can a channel under "Niche Channel Genre" continue in perpetuity? If not, what should be the criteria for a niche channel to cease to continue under the "Niche Channel Genre"?

NEO'S Views:

We have already provided our opinion above in this context.

25. How should the price of the HD channel be regulated to protect the interest of subscribers?

NEO'S Views:

Considering the small size of the subscriber base of the HD Channels and huge investment cost involved which is required to migrate from SD to HD channel at ground and satellite level, we suggest forbearance. More importantly HD business has turned out to be thriving and booming in driving up the ARPU of the DPOs, a critical condition for which the current industry is striving. Hence on this ground we suggest, forbearance unless substantial market price has been reached. Also, the same content would be available on SD format. Hence, there is no denial of service who cannot afford HD.

- 26. Should there be a linkage of HD channel price with its SD format? If so, what should be the formula to link HD format price with SD format price and why?**

NEO'S Views:

We have already provided our opinion above in this context.

- 27. Should similar content in different formats (HD and SD) in a given bouquet be pushed to the subscribers? How this issue can be addressed?**

NEO'S Views:

We have already provided our opinion above in this context.

- 28. Do you agree that separation of FTA and pay channel bouquets will provide more flexibility in selection of channels to subscribers and will be more users friendly? Justify your comments.**

NEO'S Views:

We have already provided our opinion above in this context.

- 29. How channel subscription process can be simplified and made user friendly so that subscribers can choose channels and bouquets of their choice easily? Give your suggestions with justification.**

NEO'S Views:

Subscribing to a Channel on the DTH platform is very easy as the same is done via SMS sent by your Registered Mobile Number ("RMN"), but when it comes to deactivating one of the subscribed channels from the consumer's portfolio it cannot be done via SMS. Steps should be made to ease easy activation and deactivation via SMS and should be immediate.

30. How can the activation time be minimized for subscribing to additional channels/bouquets?

NEO'S Views:

Message through SMS from RMN or through an App of the Distributor is the fastest mode of activation.

31. Should the carriage fee be regulated? If yes, what should be the basis to regulate carriage fee?

NEO'S Views:

At the outset, we oppose payment of carriage fee in any manner whatsoever. In the event carriage fee is to be paid then it should be applicable only to FTA channels and not Pay TV channels and in this context we suggest that in order to regulate carriage fee the MSOs need to disclose the amount and discounts given and charged by them in non-discrimination and fair manner. DPOs should publish in advance the terms and the model as a standard practice and get approval from the Regulator.

All deals have to be subscription/ CPS based deals or else it will lead to distortion of subscription model in favour of carriage. Distributors will force carriage to get past the CPS models.

32. Under what circumstances, carriage fee be permitted and why?

NEO'S Views:

Ideally, there should be no carriage fee. Since the concept of carriage fee has been coined during the analogue era and due to the bandwidth constraints prevailing during that time, which doesn't exist anymore in Digitalisation. However, if carriage fee is to be permitted & charged, then it should be only applicable to FTA channels (which are pre dominantly advertisement driven) and not to Pay TV channels.

33. Is there a need to prescribe cap on maximum carriage fee to be charged by distribution platform operators per channel per subscriber? If so, what should be the "price Cap" and how is it to be calculated?

NEO'S Views: *In view of earlier submission, carriage fee should not be charged from the broadcaster, however, if it to be charged, there should be capping on maximum carriage fee to be charged by the distribution platform operators per channel per subscriber. Vide our submission, we would like to propose that maximum limit needs to be defined for carriage fee keeping in mind that it should be transparent and non-discriminatory.*

34. Should the carriage fee be reduced with increase in the number of subscribers for the TV channel? If so, what should be the criteria and why?

NEO'S Views:

We have already provided our opinion above in this context.

35. Should the practice of payment of placement and marketing fees amongst stakeholders be brought under the ambit of regulation? If yes, suggest the framework and its workability?

NEO'S Views:

Yes, the practice of payment of placement and market fee amongst stakeholders should be brought under the ambit of regulation. It must be a pre condition for DPOs to sign the interconnect agreement with all the channels & submit to the regulator before any marketing& placement fee understanding has reached and that to be disclosed to the regulator with original content.

Regulator must make it obligatory for DPOs to publish their market/placement fee upfront after getting approval from the Regulatory or as per the regulations which may be undertaken in due course for regulating placement/market fee so that broadcaster may objectively pick up any of market/placement product as published on the website of DPOs. In the event, any channel picks up the any listed market/placement product with listed terms from the DPOs website, then DPOs cannot repudiate.

36. Is there a need to regulate variant or cloned channels i.e. creation of multiple channels from similar content, to protect consumers' interest? If yes, how should variant channels be defined and regulated?

NEO'S Views:

Yes, there is a need to regulate variant or cloned channels to protect consumer's interest. The consumer should have the full authority to subscribe to the "Cloned Channels" based on the value its delivering to the consumer and such channels should not be forced upon the consumers.

37. Can EPG include details of the program of the channels not subscribed by the customer so that customer can take a decision to subscribe to such channels?

NEO'S Views:

Yes, it is a great suggestion, as this will provide choice of channels that the consumer intends to subscribe to. We fully endorse this suggestion. By providing details of the program, the subscriber can contemplate subscribing to the said channel and thereby the visibility of a small broadcaster/non vertical integrated companies can rise, thereby stopping the abuse of dominant power by significant market powers.

38. Can Electronic Program Guide (EPG) include the preview of channels, say picture in picture (PIP) for channels available on the platform of DPOs but not subscribed by the customers at no additional cost to subscribers? Justify your comments.

NEO'S Views:

It is a welcome suggestion and will not harm anyone. The said provision will also assist the subscriber in opting for new channels. For example on DTH platforms in order to watch a movie, the said channel shows a trailer of the said movie or the movie is shown for 5 minutes only and thereafter if the subscriber intends to watch it further then it has to subscribe for the same. Providing a PIP will also help the consumer to subscribe for new channels and thereby the demand for the new channels will also be created.

39. Is the option of Pay-per-program viewing by subscribers feasible to implement? If so, should the tariff of such viewing be regulated? Give your comments with justification.

NEO'S Views:

Yes, the option of pay-per-program viewing by subscriber is feasible to implement. However, the broadcaster must approve the content shown & it can never be shown live unless authorized by the broadcaster. For the tariff, we suggest forbearance, unless substantial market price has been reached

40. Will there be any additional implementation cost to subscriber for pay-per-view service?

NEO'S Views: *Not in our view, there will not be any additional implementation cost to subscribe for pay-per-view services.*

41. Do you agree with the approach suggested in para 5.8.6 for setting up of a central facility? If yes, please suggest detailed guidelines for setting up and operation of such entity. If no, please suggest alternative approach(s) to streamline the process of periodic reporting to broadcasters and audit of DPOs with justification.

NEO'S Views:

Yes, there should be a center facility to standardized reporting framework, which will lead to transparency and trust among the stakeholders. It will also help simplify reporting requirement and bring into operational efficiencies leading to a salutary effect. For doing so, the strengths of ICTs can be harnessed to set up an online facility for collecting information automatically from the SMS of all the DPOs in the pre-

defined format. This information can be pulled by the central server or can be pushed by the SMS of the DPOs in real time. Such information exchanged can be automated using web services. The infrastructure for creation of such central facility can both be installed and managed by an third party comprising of representation from broadcasters & DPOs.

In our opinion suggestion and features are given with respect to the center facility in consultation paper are sufficient and visionary for formulating a center facility. Further, the center facility should be empowered to take penal action against the defaulters so that healthy environment can be created for the industry.

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

NEO'S Views: None

Conclusion

In light of the above suggestions, we state that the Proposed Tariff Order suffers from various infirmities and the issues as stated herein need urgent redressal. We suggest TRAI to consider our views and come up with a transformed draft of the tariff keeping in mind the interests of all the stakeholders and prevailing scenario of the broadcasting industry.