



19 April 2018

To,

The Advisor (B&CS)

Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
Old Minto Road,
New Delhi - 110 002

Dear Sir,

Re: Submissions to Telecom Regulatory Authority of India ("TRAI") in response to the Consultation on Issues related to Placing of Television Channel on Landing Page

At the outset, we would like to thank the Authority for giving us an opportunity to tender our views on the "Issues related to Placing of Television Channel on Landing Page".

In regard to the present consultation process, we submit that we have perused the "Issues related to Placing of Television Channel on Landing Page" carefully. We hereby submit our comments attached as **Annexure**. The said comments are submitted without prejudice to our rights and contentions, including but not limited to our right to appeal and/ or any such legal recourse or remedy available under the law.

The same are for your kind perusal and consideration.

Yours Truly,

For ABP News Network Pvt. Ltd.



Kishan Singh Rawat

Head - Administration and Regulatory Affairs

Date 22/4
Dy. No. 136
Advisor (B&CS)-II

Encl: As above

Advisor (B&CS)-II
Dy. No. 05
Date 19/4



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BY HAND/ELECTRONIC MAIL

**Re: Submissions to Telecom Regulatory Authority of India ("TRAI") in response to the
"Issues related to Placing of Television Channel on Landing Page"**

Kind Attention:

Advisor (B&CS)

Telecom Regulatory Authority of India,

Mahanagar Doorsanchar Bhawan,

Jawahar Lal Nehru Marg,

Old Minto Road,

New Delhi - 110 002

INTRODUCTION

The exceptional growth of the number of TV channels combined with the inherent limitations of analogue cable TV systems had posed several challenges, mainly due to capacity constraints and non-addressable nature of the network. The evolution of technology has paved way for bringing about digitization with a marked increase in number of channels and carrying capacity of a Distribution Platform Operator ("DPO"), coupled with increase of subscribers receiving TV channels through various Digital platforms penetrating to every household including to the rural areas of the country. Thus leading to a high intensity in competition amongst the broadcasters with the challenge to tap the maximum viewership, which in turn is the ultimate end to higher revenues.

The television ratings of a channel are an important challenge to every broadcaster, to put its channel on a higher pedestal amongst the other channels available. Accordingly, the practice of placing a channel on the landing page has been resorted to by the broadcasters. The said practice is a boon as well as a curse for the broadcasting industry, however if regulated in the right manner can be beneficial to the industry.



The landing page is certainly the prime property owned by a DPO, which ideally is meant for promoting and advertising; however it is also a high and easy revenue earning property, wherein the said property is given away by the DPO to the highest bidder which necessarily is a broadcaster to place its channel at the said prime LCN.

However, this practice is a curse for the industry wherein, big players in the industry use it as an easy tool to increase its television rating to score a better ranking amidst the channels available, amounting to discrimination between channels of the same genre who are located at a lower LCN in the said genre or cannot afford and compete to have itself placed and located on the prime landing page of a DPO.

Therefore, it is important with the Authorities to bring clarification to address the said issue in a manner that would in turn be beneficial for all stakeholders in the industry without prejudicing the interests of other broadcasters.

Therefore ABP News Network Private Limited is responding to the questions as put forward by the Authority in the present Consultation paper.

RESPONSE TO ISSUES FOR CONSULTATION:

Q1. Do you feel that emerging concept of placing TV channel on landing page can influence TRP ratings? Suggest the action which may address the issue with justification.

Yes, the concept of placing TV channel on landing page certainly influences the TRP rating of a channel. Wherein, with a simple switching on of the STB by a subscriber lands the consumer to the landing page until he/she decides the channels he/ she wants to watch, which is a time consuming process wherein the consumer first scrolls through the guide/ main menu, reading the description of the content telecasted on the channel and deciding basis his/her mood to watch. While the BARO-O Meter implanted is running calculating the clock minute of the subscriber's stay on the said landing page.

With the present Audience measurement methodology adopted, wherein a unique watermark code is embedded in the audio component of the channel to calculate the clock minute of the each channel and evaluate the TRP which undoubtedly is a brilliant mechanism to calculate the TRP, any channel on the landing page will get a undeniable distinct advantage in the TRPs it receives as and when a subscriber switches on the STB basis the clock minute the subscriber continues to stay on the landing page intentionally or unintentionally.

As stated above, Landing Page can be derogatory for the industry, especially when bigger players already well established use it as a platform to increase its Television Ratings/viewership/coverage.

Therefore it is suggested, in the interest of all stakeholders in Broadcasting industry, that the concept of the placing live TV channels on landing page should be done away with and the Landing Page shall only be allowed to be used for its original purpose, i.e., for publicity and marketing with the condition that it shall have no watermarking and the promos shall be allowed for a maximum time of 3 minutes at a stretch. Further, Authority is also requested to determine the price for placement of a channel on the landing page.



