

BHARAT JYOTI CONSUMER ADVOCACY GROUP

COMMENTS ON ISSUES FOR CONSULTATIONS ON MOBILE TELEVISION

- Q.1 The mobile television service is still in its evolutionary stage across the world. The technology for mobile television should be left to the service provider.
- Q.2 The technology should not be regulated.
- Q.3 The initial frequency requirement for terrestrial TV broadcasting may be met by allotting one 7/8 MHz Analogue RF channel in VHF/UHF band for each Mobile TV Operator. Each RF Channel can carry 20-25 mobile digital TV channels. With advancement of compression techniques, each RF channel could still carry more digital TV channels in future. The existing available frequency spectrum in VHF and UHF bands will be adequate to meet the frequency requirement of Terrestrial Mobile TV Broadcasting Operators including Doordarshan. As regards to Satellite Mobile TV Broadcasting, which is presently being operated in S Band in Japan and Korea, the frequency requirement could be easily met by reserving part of S Band for Satellite Mobile TV Broadcasting, alongwith other services(Mobile 3G).
- Q.4 It will be preferable to have dedicated terrestrial transmission for Mobile TV as the frequency spectrum in VHF/UHF Bands is already available. The frequency spectrum in S band which is presently occupied by Defence, may have to be got vacated and shared with 3 G Mobile Telecom. service.
- Q.5 A limited frequency spectrum requirement for analogue/digital mobile TV terrestrial broadcasting should be earmarked in the broadcasting bands.
- Q.6 Initially 3 to 4 channels of 8 MHz could be blocked for mobile TV services. The future frequency spectrum requirement could be met from the available VHF III and UHF bands.
- Q.7 Digital Terrestrial Transmission should be given the priority as it requires much lower frequency bandwidth and uses SFN. It provides higher quality of picture compared to analogue transmission.
- Q.8 It should be highly efficient SFN, which is a special inbuilt feature of Digital TV and Mobile TV transmission.
- Q.9 The frequency allocation should be by auctioning. There should not be any further utilization fee.
- Q.10 The eligibility conditions for the license to operate the Mobile TV Service could be on the similar lines as for DTH/HITS Operators. However, the existing UASL and Mobile TV Operators should not require any further license to operate the Mobile TV Service, as their existing licenses already permit them to carry Voice, Data, Video/Television signals over their networks.
- Q.11 The network requirement must be laid down to ensure that only companies with a strong financial background participate in the licensing process of Mobile TV. It could be similar as for Private FM Radio License.
- Q.12 FDI limit should be same 74% as for Telecom. Sector. In fact it should be raised made Uniform 74% in all Radio Broadcasting services.
- Q.13 It should be 10 years with an option to seek 10 year extension.

- Q.14 A REVENUE Share based license fee regime with a one time entry fee alongwith annual revenue share may be adopted for Mobile TV as for Telecom. and Private FM Radio Broadcasting.
- Q.15 Yes, the revenue share system would be more appropriate.
- Q. 16 The purpose of Bank Guaranttee is to ensure compliance of terms and conditions of license in terms of performance and payments. It could be 40 crores as for DTH License.
- Q.17 The license for mobile television service should be on national basis. as it will economize on content and good for national integration. The satellite mobile TV broadcasting in any case has got nationwide footprints.

Our view is that since the mobile TV service is still evolving all over the world and also seeing the socio-economic status of the country (the telephone density still being 20 % or so), it will be advisable to wait for sometime more to venture in this field.

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