

**CONSUMER PROTECTION ASSOCIATION
HIMMATNAGAR
DIST. : SABARKANTHA
GUJARAT**



**Comments on
Consultation Paper
on
Ministry of Information and Broadcasting (MIB)
back reference on TRAI's Recommendations dated 19.11.2014 on
“Regulatory Framework for Platform Services”
and
MIB reference on TRAI's Recommendations on “Platform Services
offered by DTH Operators” dated 13.11.2019.**

Comments :

We agree with the TRAI for the registration of Platform service channel service provider to ensure :

- (i) Uniformity in the legal status of all the DPOs offering PS.
- (ii) Ensure better transparency oversight and regulatory compliance.

- (iii) To prevent spreading misinformation as Platform channels can quickly and widely spread information/misinformation.
- (iv) Liberal regulatory framework of PS should not encourage bypassing of traditional broadcast route.
- (v) The DTH operators being the distributors of the broadcasting value chain primarily have to carry the content produced by the broadcasters, and not to produce their own content. The domain and functioning of the DTH operators are different from that of the broadcasters. Moreover, with the presence of a large number of already-available permitted satellite TV channels (900+) spread across multiple regional languages and genres, there is no pressing requirement, for a large number of PS channels to be available especially on the DTH platforms as they have a national presence and not limited to a small area. Further DTH operators are primarily carrier of the contents produced by broadcasters; not content producers.

Therefore, as such there is no need to change the recommended cap of 3% of the total channel carrying capacity for the platform services.

- (vi) An upper limit of 15 channels is also important so that even if the channel carrying capacity gets increased in future, it should be

given to broadcasters who are waiting for the channel capacity. As the broadcasters are not permitted to reach to consumers directly, they are dependent only on the distributors, allowing more channels as PS will put artificial restriction on the broadcasters to launch new channels and in turn, they will be discouraged to bring new channels in the sector which will adversely affect the public interest at large.

- (vii) Allowing more PS channels to DTH operators, the operators will block a large capacity for their own use which can seriously jeopardize the availability of slot not only for new broadcasters but also for Government mandatory channels.
- (viii) DTH operators have pan India presence by the virtue of technology, and availability of satellite foot print, they do not have to cater to the requirements of any local audience or a particular demography. PS are generally meant for MSOs to carry some local community interest programme.

We support the TRAI's response in this consultation paper.

Thanks.

Yours faithfully,

(Dr. Kashyapnath)
President