

Comments on the consultation paper on Mobile TV Services.

by

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I should commend the paper on multiple counts.

- 1) Paper does well to offer technical comparison of different technologies and market experiences.
- 2) By defining what a 'mobile tv' service is it clears the confusion created by couple of telecom operators who are offering video clips on streaming as 'Mobile TV' service.
- 3) By identifying the need for a separate class of operators – Mobile TV operators it has kept the flexibility for a multi-player environment including DTH, cable & not just telecom operators holding UASLs.

The paper could have also focused on the following additional aspects

- 1) Consumer Point of View:

To understand the different Mobile TV technologies is clearly beyond the scope of consumers. Its still early days for the market need for watching a TV wholly on mobile. The immediate need is for video on demand and video clips. The consumer cares for his/her handsets. Technology gives choice but at a cost. Handsets with support for Mobile TV should not result in switching costs. Customer will definitely incur a cost in switching to a mobile TV supported handset with better buffering capability, LCD display and bigger fourth screen.

- 2) Content Laws

The prevalent broadcasting laws should continue to apply for Mobile TV service too.

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

In the case of Mobile TV it is less about technology and more about power politics and lobbying by the proponents of existent Mobile TV standards. Each technology has its strengths and demerits and there is no clear market leader as yet. India could play the waiting game as 3G is still to be rolled out. The market should be open for trials of various technologies. Meanwhile the advanced markets such as EU and Europe will have success stories that could be replicated. The technology choice should be ideally left to market forces and service provider. This will only create extra costs for subscribers in terms of different handsets, confusing claims of superiority of QoS and mainly increases the cost of offering the service due to high cost of network equipment due to lack of homogeneity. The market will benefit if the technology is regulated based on criteria, predefined by the regulator and the service providers.

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.

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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?

Earmarking the bands will help prevent extra costs of procuring appropriate network equipments.